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**Supplementary Information** 

Written submission from Orano Canada Inc.

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

Renseignements supplémentaires

Mémoire d' Orano Canada Inc.

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 mars 2023



# Orano Canada Inc.

The Decommissioned Cluff Lake Project

Indigenous Engagement Report
Version 1 Revision 3

February 2023





## **Table of Contents**

1	Projec	t History	1-1
	1.1 Reg	ulatory	1-4
2	Identif	ication of Indigenous Groups	2-1
2	2.1 Proje	ect Location	2-1
2	2.2 Histo	oric Identification of Indigenous Groups	2-3
2	2.3 Iden	tification of Current Indigenous Groups, Communities or People(s)	2-4
2	2.4 Trad	itional Land Users and Treaty Right Holders	2-5
2	2.5 Indig	enous Communities: Leadership and Members	2-8
2	2.6 Méti	s Nation - Saskatchewan	2-8
2	2.7 Othe	er Indigenous Groups	2-8
	2.7.1	Ya'thi Nene Lands and Resource Office	2-8
	2.7.2	Northern Saskatchewan Environmental Quality Committee	2-8
2	2.8 Sum	mary	2-10
3	Identif	cation of Potential Adverse Impacts	3-1
		l Use	
	3.1.1	Land Use - recommendations	
4	Engag	ement Summary	4-1
	Table	4-1: Engagement related to the 2020 Application	4-1
4	1.1 Key	Actions/Initiatives Resulting from Engagement	4-18
4	1.2 Plan	ned Engagement	4-22
5	Engag	ement Records	5-1
		eholder Issues and Information Management System (SIIMS) Database	
		Figures	
Figu	re 1:	Location of the Decommissioned Cluff Lake Project	1-2
_	re 2: re 3:	Cluff Lake – Remaining Parcels to be Transferred into IC Program	
Fia	re 4:	NAD CommunitiesLocal ACFN Land Use near the Decommissioned Cluff Lake Project	
_	re 5:	Local CRDN Land Use Near the Decommissioned Cluff Lake Project	

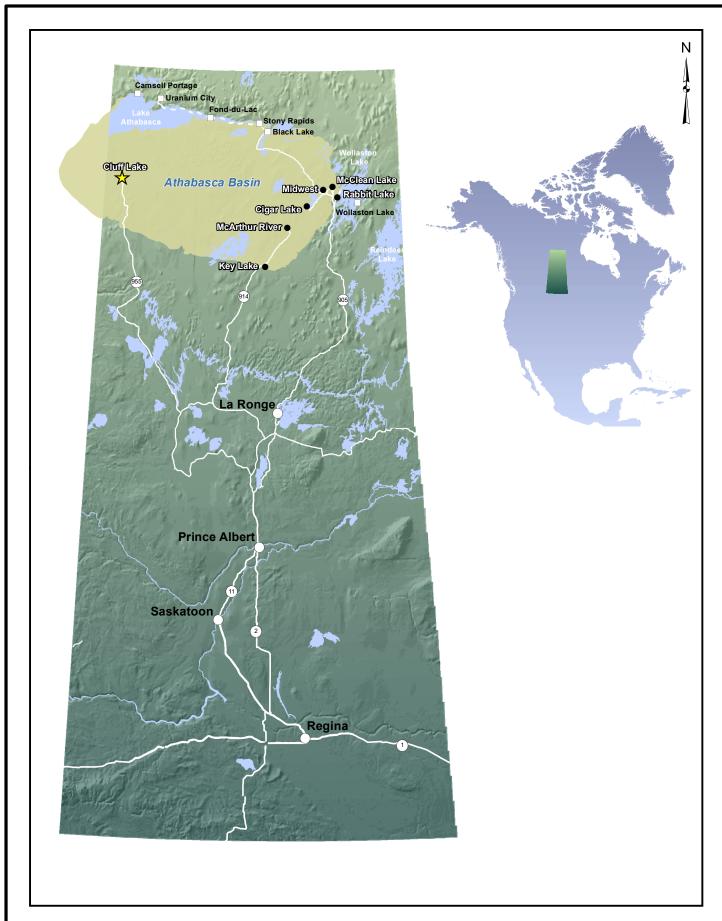
### 1 Project History

The Cluff Lake Project is a former uranium mine and mill site located in the Athabasca Basin of northern Saskatchewan. The mine site is located approximately 900 km north of Saskatoon, Saskatchewan, and approximately 75 km south of Lake Athabasca (Figure 1). The Cluff Lake Project is owned by Orano Canada Inc. (Orano).

The Cluff Lake Project commenced mining and milling operations in 1980. Over the 22-year operating life of the mine, five ore bodies were extracted using either underground or open pit techniques. The Cluff Lake Project produced 28 million kilograms of uranium concentrate (U<sub>3</sub>O<sub>8</sub>) over its operational period and produced its final barrel of yellowcake in December 2002. Operational facilities at the Cluff Lake Project included open pit and underground mines, a mill, a tailings management area (TMA) with a two-stage liquid effluent treatment system, a residential camp area, and various other support and site infrastructure facilities.

Over its operating life, the Cluff Lake Project was the largest industrial employer on the west side of northern Saskatchewan providing a stable base of employment for over 20 years generating about 4,000 person years of company staff employment. Employees averaged around 200 at a given time and with on-site contractors, indirect, and induced employment this number is estimated to have been as high as 958 individuals employed in 1996. Approximately 52% of company staff were northern residents and approximately 80% of northerners were from the west side of the province. The company was recognized for advancing residents of northern Saskatchewan into management and supervisory positions. The training and experience gained by individuals throughout the project life provided transferable skills for subsequent employment. As well, nearby lands continued to be used for traditional purposes that included the safe consumption of country food.

Mining operations include decommissioning as a phase in the overall project life. The Cluff Lake Project may be considered the first decommissioned uranium mine site of its era in Saskatchewan. With the end of successful operations in 2002, the decommissioning of the site underwent a decommissioning environmental assessment (Comprehensive Study for Decommissioning (CSD), COGEMA 2000a and Comprehensive Study Report (CSR), CNSC 2003). The general decommissioning objectives and appropriate locations and timeframes for accomplishing the objectives were established in consultation with federal and provincial authorities and through the public engagement process.



Projection: NAD 1983 UTM Zone 13N

Compiled: T.Lohman
Date: 2022-08-26
Scale: 1:6,000,000
Data Sources: Natural Resources Canada, Geobase®, Nation
Topographic Database, ORANO Canada Inc.

**CLUFF LAKE PROJECT** 

### FIGURE 1 LOCATION OF THE DECOMMISSIONED CLUFF LAKE PROJECT



Subsequent to receiving federal and provincial environmental assessment and licensing and permitting approvals, decommissioning of the Cluff Lake Project commenced in 2004. The majority of physical decommissioning was completed by 2006 including demolition of the mill complex buildings, covering the TMA and Claude Waste Rock Pile, moving the DJN waste rock to the Claude Pit, complete backfilling of the Claude Pit, flooding the contiguous DJN and DJX pits (referred to collectively as the DJX Pit post-decommissioning), grading, and revegetation. Underground mine raises and declines were decommissioned earlier at the cessation of underground mining. Minor physical undertakings were completed in 2013 to mark the end of an on-site presence, included the demolition of a small residential camp which included potable and sewage treatment plants, two steel outbuildings, and the Secondary Treatment System. The Cluff Lake site has been in post-decommissioning monitoring since 2006 with a transition to campaign monitoring in 2013. Final minor physical works were completed in 2017 and 2018, with the site in the post-decommissioning phase, it was readied for transfer back to the province through the Institutional Control (IC) Program.

In 2019, the surface lease was reduced from 1632 hectares to 336.39 hectares through the free release of the following parcels of land were from the Cluff Lake surface lease:

- Undeveloped/undisturbed areas 508.11 hectares
- Surface waterbodies (Cluff Lake and Island Lake as they do not require long-term controls or maintenance) – 527.21 hectares
- Remediated areas of previous surface disturbance 260.76 hectares

With the establishment of the Institutional Control (IC) Program under *The Reclaimed Industrial Sites Act* (Saskatchewan), parcels of land that, in consequence of development and use, require long-term monitoring and, in certain circumstances, maintenance, can be transferred to the Government of Saskatchewan if the site achieves an end state of long-term safety and stability and the proponent provides funds necessary for the government administration of the decommissioned site.

Parcels that, in consequence of development and use, require long-term administrative controls, and in certain circumstances, maintenance remained in the Cluff Lake surface lease and will be transferred to the provincial IC Program include:

- D Mining Area: D-pit
- Claude Mining Area: Claude pit, Claude waste rock pile, Claude peat trenches
- DJ Mining Area: DJN/DJX pit, DJ underground mine
- OP-DP Mining Area: OP/DP underground mine
- Mill Complex Area
- Tailings Management Area
- Landfills: domestic, industrial, Secondary Treatment System Ponds, mill landfill and Cluff centre landfill

Lakes: Snake and Claude lakes

In 2019, the CNSC Commission concluded that the objectives of the Cluff Lake Project Detailed Decommissioning Plan had been achieved, and that the engagement and communications efforts had been satisfactory (CNSC 2019). With decommissioning objectives sustainably achieved and long-term stability of the site projected, in February 2020, Orano requested that the Province of Saskatchewan accept the Cluff Lake property into the IC Program.

The remaining leased area, to be transferred into the IC program is 336.39 hectares (Figure 2).

### 1.1 Regulatory

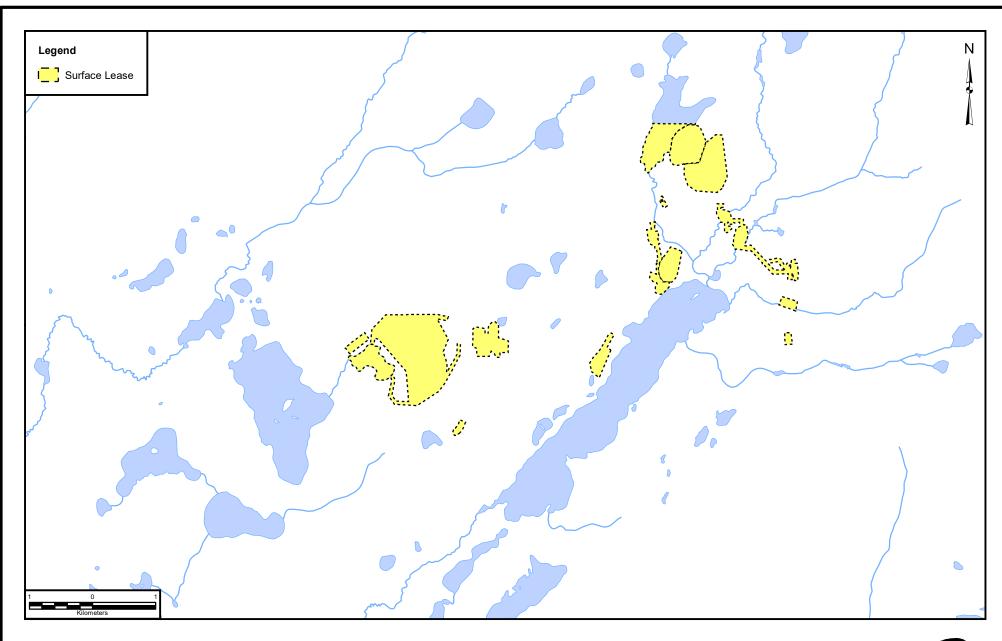
With decommissioning objectives sustainably achieved and long-term stability of the site projected, in February 2020, Orano requested that the Cluff Lake property be accepted into the IC Program.

The successful transfer into the IC Program requires simultaneous and contingent approvals from the Saskatchewan Ministry of Energy and Resources, Saskatchewan Ministry of Environment (Environmental Protection Division and the Lands Branch of the Resource Management and Compliance Division) and the Canadian Nuclear Safety Commission (CNSC).

On August 10, 2022 the CNSC formally announced a public hearing for March 1, 2023 to consider Orano's request for the transfer and exemption of the sole licensable activity to possess, manage, store radioactive waste (i.e. the activities will no longer be licensed thereby effectively closing CNSC licence UMDL-MINEMILL-CLUFF.00/2024 ("the Cluff Lake licence"). Allowing for:

- the transfer of the Cluff Lake licence and property to the Ministry of Energy and Resource; and
- the exemption of the Province of Saskatchewan for the activity to possess, manage, store radioactive waste

The successful transfer to the IC Program requires simultaneous and contingent approvals from the Saskatchewan Ministry of Energy & Resources, and the Saskatchewan Ministry of Environment (both the Environmental Protection Division and the Lands Branch of the Resource Management and Compliance Division); which have been received, contingent upon the CNSC determination to revoke the Cluff Lake mine licence.



Projection: NAD 1983 UTM Zone 12N

Compiled: T.Lohman

Date: 2022-08-26

Data Sources: Natural Resources: Canada, Geobase®, Nation Topographic Database, ORANO Canada Inc.

**CLUFF LAKE PROJECT** 

#### FIGURE 2

CLUFF LAKE - REMAINING PARCELS TO BE TRANSFERRED IN INSTITUTIONAL CONTROL PROGRAM



### 2 Identification of Indigenous Groups

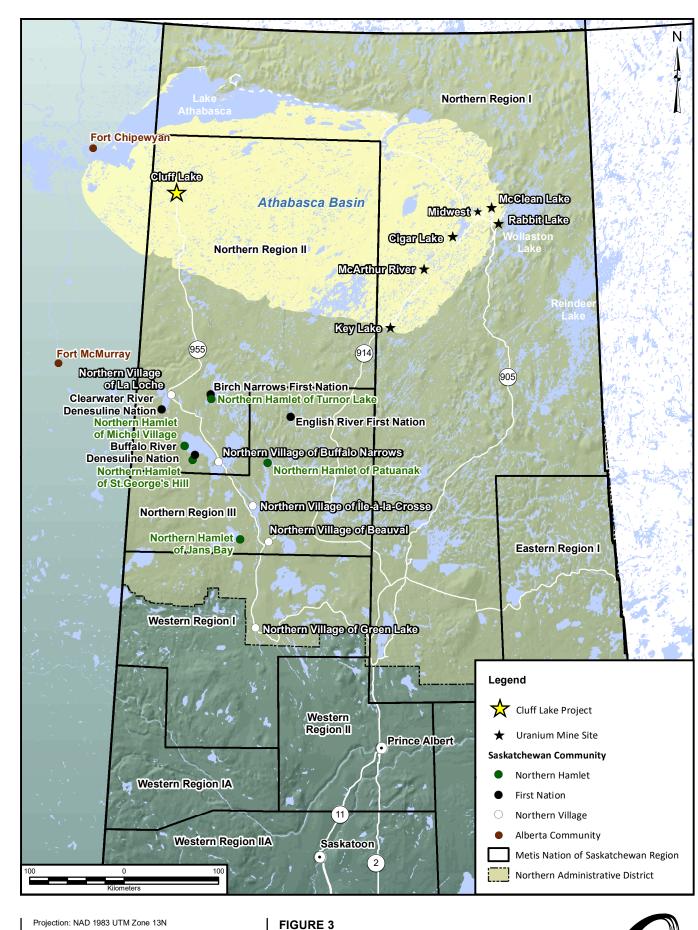
### 2.1 Project Location

The Cluff Lake Project is located in northwestern Saskatchewan on Treaty 8 Territory, and within the Homeland of the Métis. Orano respects and honors Treaty 8 and the Homeland of the Métis and is committed to working in partnership with Indigenous Peoples in the spirit of reconciliation and collaboration.

The closest community to the Cluff Lake project is Fort Chipewyan, Alberta, located approximately 165 km (via air) to the northwest, while the closest communities by road are Clearwater River Dene Nation (CRDN) and La Loche, Saskatchewan, located approximately 250 km to the south. From a Saskatchewan Provincial Government administrative perspective, it is considered within the Northern Administrative District (NAD), an administrative area defined by the Saskatchewan Provincial Government.

Northern Saskatchewan poses a particular challenge in terms of public information as it features low populations spread across a vast geographic region. The NAD is comprised of approximately half of Saskatchewan's land area but less than four percent of the province's population or roughly 37,000 people. The communities encompassed within the NAD include First Nation, Métis, and other municipalities.

When Cluff Lake first commenced operations, it was one of the only mining operations in the NAD, and as such, much of the NAD was interested in the activities occurring at the site. As time has progressed, a number of other mining and milling operations have started in other regions within the NAD. Far field communities generally have an interest and actively participate in their neighbouring economic opportunities. The Public Information Program (PIP) developed for the Cluff Lake Project focuses on the western side of the NAD, which reflects a reasonable narrowing of the NAD to address current interest in the Cluff Lake Project (refer to Figure 3). The PIP includes the identification of Indigenous Groups and other public stakeholders. This Indigenous Engagement Report will focus on Indigenous Groups related to the current licence request.



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CLUFF LAKE PROJECT

THE CLUFF LAKE PROJECT IN RELATION TO THE METIS NATION OF SASKATCHEWAN REGION AND NAD COMMUNITIES



### 2.2 Historic Identification of Indigenous Groups

Identification of Indigenous interests and interested parties has been occurring since the 1970's, through environmental assessment processes, public regulatory proceedings, issuance of regulatory approvals, surface lease agreements and establishing relationships as Orano endeavored to improve its understanding of the area.

Over time, with the evolution of best engagement practices and the current status of the site, the Indigenous and other key interest groups have become more refined.

The initial environmental assessment for the Cluff Lake Project was conducted in 1978 with the Bayda inquiry, which approved uranium mining and milling operations at the Cluff Lake Project, commencing in 1980. The facilities included open pit and underground mines, a mill, a tailings management area with a two-stage liquid effluent treatment system, a residential camp area, and various other support and site infrastructure facilities. The Province of Saskatchewan issued, and continues to administer, a surface lease for the Cluff Lake Project. The Canadian Nuclear Safety Commission and the Province of Saskatchewan are the main regulatory authorities for the Cluff Lake Project.

In 1999, Orano, (then named COGEMA Resources Inc.) began the environmental assessment process under the *Canadian Environmental Assessment Act* (CEAA) to decommission the Cluff Lake Project. At the same time, a public consultation program was initiated that involved rightsholders and interested members of the public identified over the many years of previous environmental assessments, construction, and operations. The public consultation program was conducted in three phases, and involved workshops, issues identification, meetings, and open houses from 1999 to 2002. The public consultation program involved the following Indigenous and other key interest groups:

- Municipalities (leadership and local residents)
- Northern Saskatchewan Environmental Quality Committee (NSEQC)
- Indigenous groups (First Nations, Métis, leadership, and elders)
- Business sector (including outfitters)
- Community groups (non-profits including youth and elders, trappers associations and others)

The environmental assessment for decommissioning was approved and authorization to proceed with decommissioning activities granted by the CNSC. These activities were largely completed by 2006, when the site entered post decommissioning monitoring phase. Through a public hearing process in 2019 the CNSC accepted that the decommissioning objectives had been achieved.

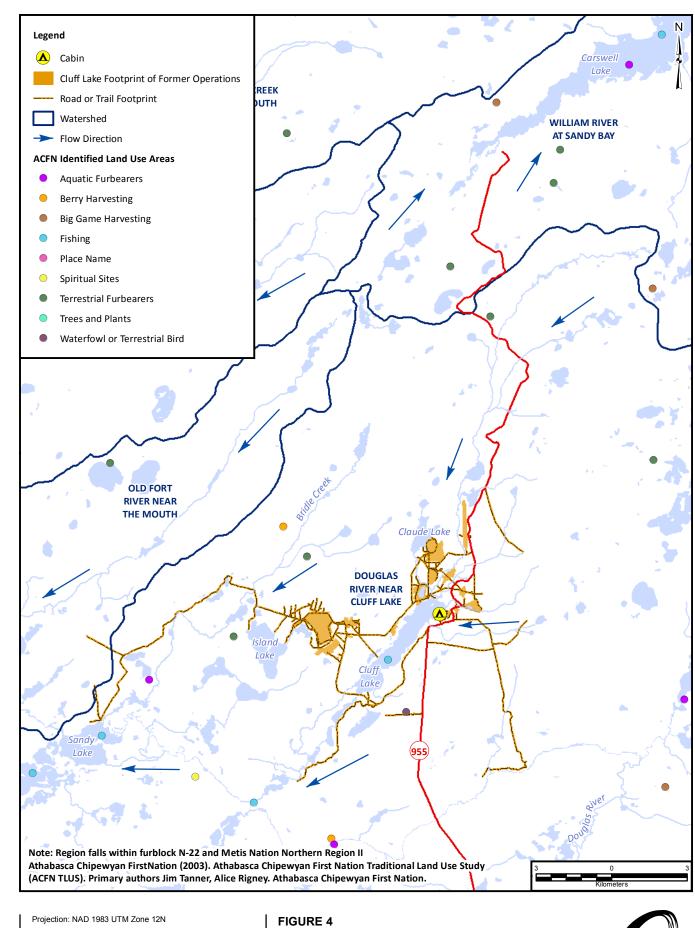
### 2.3 Identification of Current Indigenous Groups, Communities or People(s)

. Knowledge of continued interest, proximity to the site, and land use have informed the Indigenous groups, communities or people(s) identified as primary target audiences for this regulatory process. Applying this methodology, Orano identified the following stakeholders in the Cluff Lake Project:

- Athabasca Fort Chipewyan First Nation (ACFN), which is located in Alberta approximately 165 km (via air) from the Cluff Lake Project;
- Three ACFN members that co-own a Traditional Resource User cabin on Cluff Lake and hold trapping licences under Fur Block N-22;
- Clearwater River Dene Nation (CRDN), which is 259 km from the Cluff Lake Project; and
- Two Métis individuals with N-22 trapping licences.

### 2.4 Traditional Land Users and Treaty Right Holders

Orano has developed long-standing relationships the Cluff Lake Project's Indigenous stakeholders. Through engagement, Orano was able to identify and document traditional land use near the Cluff Lake Project. The land use information shared from ACFN and CRDN is provided in Figures 4 and 5.



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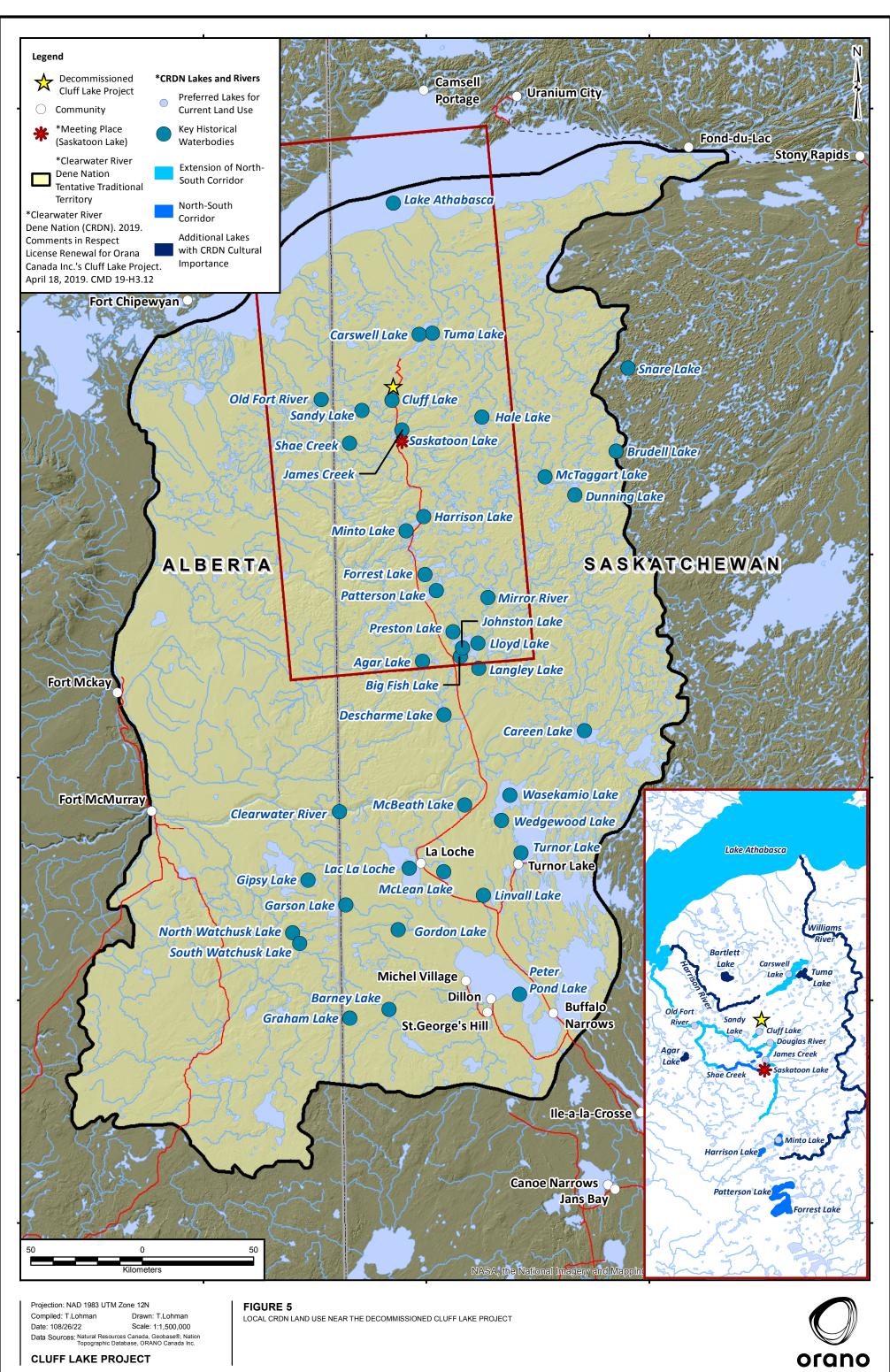
Date: 08/26/22 Scale: 1:150,000

Data Sources: Natural Resources Canada, Geobase®, Nation Topographic Database, ORANO Canada Inc.

**CLUFF LAKE PROJECT** 

LOCAL ACFN LAND USE NEAR THE DECOMMISSIONED CLUFF LAKE PROJECT





### 2.5 Indigenous Communities: Leadership and Members

Engagement with CRDN is typically conducted with the Chief and counsel, and their representing engagement consultants. The ACFN is represented by the Dene Lands & Resource Management (DLRM). The DLRM was established to create capacity of the community in order to work with Industry and government to assess environmental impacts of industry development in the ACFN territory.

#### 2.6 Métis Nation - Saskatchewan

The Cluff Lake Project is within the Homeland of the Métis, specifically Northern Region 2 (NR 2). Orano has directly engaged with Métis Locals, within NR2 regarding the Cluff Lake Project (primarily La Loche and Buffalo Narrows). During the operation of the mine; decommissioning planning and execution Orano has engaged as requested, and followed accepted practices of the time, engaged with the Métis Local representatives, Métis Northwest Council Representatives or through their representation on the Northern Saskatchewan Environmental Quality Committee (NSEQC). However, Orano acknowledges the Métis Nation-Saskatchewan (MN-S) provincial body has recently reorganized and created a point of contact to represent their local organizations for project discussions, when designated by local parties. At the onset of the engagement for this regulatory proceeding, Orano was requested by MN-S to directly engage with them and they would direct information to the Métis Locals.

### 2.7 Other Indigenous Groups

#### 2.7.1 Ya'thi Nene Lands and Resource Office

Established through the Collaboration Agreement with the Athabasca Basin communities for the McClean Lake Project, the Ya'thi Nene Lands and Resource Office (YTN) provides capacity for environmental management and monitoring for projects in the Athabasca Basin.

The Athabasca Communities represented by the YTN have not historically expressed interested the Cluff Lake Project, however following the YTN's intervention in the 2019 public hearing for the renewal of the Cluff Lake decommissioning licence, Orano identified the YTN as group with potential interest in future proceedings.

#### 2.7.2 Northern Saskatchewan Environmental Quality Committee

Although not identified as an Indigenous group, the Northern Saskatchewan Environmental Quality Committee (NSEQC) was created in 1995 by the Saskatchewan provincial government to assist northern Saskatchewan residents in understanding the various facets of uranium mining and milling. The west side sub-committee has played an important role in the decommissioning of Cluff Lake, as the sub-committee consists of representatives from the communities in the general region of Cluff Lake, including representatives

of nearby First Nation communities and Métis Locals, who were the primary contacts for Métis until the reorganization of the M–N-S. The communities participating in the NSEQC are as follows:

- Northern Village of Beauval, including:
  - Métis Local #37
- Northern Hamlet of Turnor Lake, including:
  - Métis Local #40
- Northern Village of Buffalo Narrows, including:
  - Métis Local #62
- Northern Village of La Loche, including:
  - Métis Local #39
- Clearwater River Dene Nation (Treaty 8)
- Canoe Lake Cree Nation (Treaty 10)
- Northern Hamlet of Jans Bay including:
  - Métis Local #38 and
  - Sapawgamik #176
- English River First Nation (Treaty 10)
- Northern Village of Green Lake, including:
  - o Métis Local #5, and
  - Dore Lake/Sled Lake (Métis Local #67)
- Northern Village of Ile a la Crosse, including:
  - Métis Local #21, and
  - Canoe River Métis Local #174
- Northern Hamlet of Michel Village, including:
  - Métis Local #65
- Northern Hamlet of Patuanak, including:
  - Métis Local #82
- Northern Village of Pinehouse, including:
  - Métis Local #9

### 2.8 Summary

Identification of Primary Indigenous Groups for the 2023 Public Hearing	Key Factors
Athabasca Chipewyan First Nation	Traditional and Current Land Use
	Project within Treaty 8 territory
	Historically identified as primary rightsholder
	Member family maintains a Traditional Resource User cabin on Cluff Lake
	165 km (via air) from the Cluff Lake site
Clearwater River Dene Nation	Traditional and Current Land Use
	Project within Treaty 8 territory
	259 km from the Cluff Lake site
Métis Nation of Saskatchewan	Traditional territory
Communities and Regional Directors within Métis Northern Region #2	Traditional territory
(Birch Narrows, La Loche, Beauval, Ile-la-Cross, Buffalo Narrows)	
Northern Saskatchewan Environmental Quality Committee	As representatives of communities within the traditional territory
Ya'thi Nene Lands and Resource Office	Project in Treaty 8 territory
	Interest in project first expressed during the 2019 public hearing process
Birch Narrows Dene Nation	Treaty 10 Territory - potential land users
	Expressed interest in the 2023 public hearing process
Buffalo River Dene Nation	Treaty 10 Territory – potential land users

### 3 Identification of Potential Adverse Impacts

Orano utilized the guidance provided in Appendix A of REGDOC 3.2.2 Indigenous Engagement to assist in identifying potential adverse impacts and assessing the consultation activity spectrum (Table 1 of REGDOC 3.2.2).

Suggested Consideration	Orano's Assessment	
Step 1: Identifyir	ng Potential Adverse Impacts	
Does the activity described in the licence application have likely or potential impacts on land, water and resources? Are these changes significant? What is the spatial extent of the potential impacts? Are there potential impacts beyond the immediate footprint of the regulated facility?	The Cluff Lake project is fully decommissioned, with unrestricted access. Environmental and Human Health risk assessments conclude that the site is stable and safe for use, including for people who may hunt, fish, drink water and gather from the site; food from and near the site is safe to share with extended families, including children	
Are there any Indigenous groups that claim traditional territory that encompasses the location of the regulated facility?	Yes, Orano has established relationships with the Indigenous and Métis communities interested and or located nearby the decommissioned Cluff Lake Project.  ACFN, CRDN and MN-S (including various Métis locals)	
Are there any First Nations reserve lands, treaty lands, or Indigenous communities located near the regulated facility?	Cluff Lake decommissioned property is located in Treaty 8 Territory (CRDN, ACFN), and within the Homeland of the Métis; closest community is over 100 km from the site	
Does the activity described in the licence application involve lands or resources that are currently the subject of land claim negotiations or are part of existing comprehensive land claim agreements or self-government agreements?	Metis Nation of Saskatchewan is working within the Recognition of Indigenous Rights &Self Determination (RIRSD) process to resolve the North West Saskatchewan Land Claim. The matter is currently before the courts. To Orano's knowledge there is no existing land claim agreement.	

#### **Suggested Consideration**

#### **Orano's Assessment**

#### **Step 1: Identifying Potential Adverse Impacts**

Have any environmental or other assessments of the regulated facility been carried out? Have any environmental or other assessments been undertaken for similar activities in the vicinity of the regulated facility? If so, what adverse impacts on rights and/or related interests are revealed, if any, by these assessments?

Yes, environmental assessments have been conducted on activities related to the operation and decommissioning of the Cluff Lake project.

A comprehensive study report was accepted in 2004, establishing key decommissioning objectives.

Orano's end-state objectives include:

- environment was safe for use by human and non-human biota;
- reclaimed landscape is chemically and physically stable;
- self-sustaining landscape allows utilization for traditional purposes; and
- potential constraints on future land use are minimized

Traditionally, the site was seasonally accessed by an Indigenous trapper who maintained a commercial trap line in the local study area. The trapper also hunted and fished for personal consumption. There is no evidence of other site activities by Indigenous or non-Indigenous peoples prior to site development.

In February 2005, Orano held a workshop on the decommissioning of the Cluff Lake Project with members of the west side EQC and the ACFN to gain insights into the historic, current, and expected future traditional use of the land. During this workshop, the participants agreed upon a scenario for future land use, this scenario supported by known local land use by ACFN, would be utilized in a Human Health Risk Assessment to assess potential risk. This scenario involved year-round cabin availability at Cluff Lake, approximately 91 days would be spent in the Cluff Lake area, with 25% of the time spent in the immediate Cluff Lake area (~23 days) and 75% of the time would be spent at other lakes including Sandy, Carswell, and Two-Mile lakes.

Major outcomes of the 2005 workshop:

- Traditional land use, while sometimes utilizing land and resources in a small and preferred area, generally involves travelling over a wide area. The decommissioned Cluff Lake footprint is generally considered small relative to areas used for traditional purposes.
- Traditional land users would be unlikely to set up a cabin at Cluff Lake given that there are better fishing lakes in the region.
   The location could and would more likely be used as a base with most activities conducted away from this area. Fishing on Cluff Lake would be expected but limited as the lake is not preferred.

Suggested Consideration	Orano's Assessment		
Step 1: Identifyir	ng Potential Adverse Impacts		
	<ul> <li>The mining areas were viewed as unattractive areas for most activities, with the exception of gathering blueberries. With the exception of berry picking, activities were unlikely to be conducted in the small, localized areas affected by mining.</li> <li>The vicinity of pit lakes was viewed as unlikely areas for setting up camp. The pits are isolated from the aquatic system and, although remediated for aesthetics and safe surface water quality, traditional users are unlikely to drink water from, or fish on, pit lakes because they are obviously human-made lakes in a region of abundant and known good fishing.</li> <li>It is unlikely that a cabin in the area, away from home communities, would be occupied year-round. This feedback is consistent with current cabin use by the family owning a traditional resource user cabin on the shore of Cluff Lake who use the cabin periodically.</li> </ul>		
Are there any other activities occurring in the same	Yes, there is surrounding exploration.		
area? Is the activity described in the licence application	No, it is not expected that the transfer of the decommissioned Cluff Lake		
likely to have any cumulative effects in combination with	Project will have cumulative effects.		
other activities in the same or surrounding area?			

Suggested Consideration	Orano's Assessment	
Additional Co	onsiderations	
Are you aware of the nature and scope of any asserted rights and/or related interests in the area?	Orano is aware of former and on-going traditional rights being practiced in the Cluff Lake area.	
Has the Indigenous group continually occupied the area near the regulated facility?	As indicated through engagement with rightsholders, including the 2005 workshop, land-use near the facility was historically and continues to be casual	
Does the group still occupy the area? If the Indigenous group does not still occupy the area, at what period of time did they occupy it?	As indicated through engagement with rightsholders, including the 2005 workshop, land-use near the facility was historically and continues to be casual	
Are there historical and/or current traditional Indigenous practices occurring in the area?	Yes, Orano has land use maps from two of the three primary Indigenous groups	
What is the Indigenous perspective on the importance, uniqueness, or value of a particular use, area, activity or species?	2005 workshop held with Orano, the CNSC, and rightsholders provided feedback on the traditional land use and importance of the area.	
	Land use included, but was not limited to, fishing, hunting, berry picking, firewood collection, trapping, wild rice production, herbs and medicine harvesting, gardens, tourism, hiking, swimming, and camping.	
	It was agreed upon that for all combined activities about 91 days would be spent in the immediate Cluff Lake area per year with	

Suggested Consideration	Orano's Assessment
Additional Co	onsiderations
	25% of the land use activities occurring around the Cluff Lake site and 75% around Sandy, Carswell, and Two-Mile Lakes.
What is the Indigenous group's capacity to participate in engagement activities? (capacity can include time, financial resources, technical expertise, technology, etc.)	ACFN, MN-S and CRDN each have technical expertise and engagement personnel.
Is the Indigenous group asserting that the claimed Indigenous rights were exercised prior to European contact (or for the Métis, prior to effective control)? Do they continue to exercise these rights today in a traditional or modernized form? What impacts to an Indigenous group's rights have occurred in the past?	Yes, as noted, land use historically was and continues to be casual in nature.
Are you aware of any communication from Indigenous groups who are raising concerns about the regulated facility, similar facilities, or similar adverse effects in the area?	We have heard concerns regarding some community members perception of risk related to conducting traditional activities at the decommissioned site
Are you aware of any past grievances or issues that an Indigenous group may have with your industry or organization? How were these grievances addressed?	Engagement with rightsholders has a long history, and continues to be on-going to understand and attempt to resolve concerns as they arise
Have any Indigenous groups expressed concerns about the activity described in the licence application and suggested any remedial measures that may accommodate the adverse impacts on their rights and/or related interests?	There has been a recently emerging concern raised regarding the perception of risk by some community members, that may fear the use of the Cluff Lake area, due to past uses as a mine and mill. Orano has been working with rightsholders to better understand this concern and communicate that the area is safe to use. It is proposed that these conversations continue between the Province and rightsholders if the property is transferred to the IC program
Are there any cultural activities or events that may prevent many community members from participating in engagement activities?	No, Orano would organize engagement activities to avoid interfering with cultural activities or events
Does the Indigenous group have its own consultation protocol? Licensees may want to consider whether consultation agreements with Indigenous groups could support consultation activities. These arrangements can help to define roles and responsibilities, identify points of contact, determine timelines and steps to be followed, and sometimes address capacity needs.	Not that Orano has received formally
Is the Indigenous group involved in the negotiation for treaty land entitlements?	Not that Orano is aware of
Is the Indigenous group currently involved in any other consultations with industry or government?	Yes, for other uranium exploration and development (environmental assessment) projects

Orano's analysis of the decommissioned Cluff Lake Project, and our request to transfer the property into the Province of Saskatchewan's Institutional Control Program is unlikely to have an effect on Indigenous Rights. Decommissioning objectives have been achieved, there is unrestricted access to site with no restrictions on the exercising of traditional rights.

In conclusion, because of the reasons outlined above, with respect to Table 1: Consultation Activity Spectrum of REGDOC 3.2.2 Indigenous Engagement, Orano considers the potential for adverse impacts to Indigenous and/or Treaty Rights to be on the left side of the Spectrum (or weak).

#### 3.1 Land Use

Orano has considered Indigenous knowledge primarily with respect to understanding land use and providing for continued safe future land use.

Determining land use included questionnaire and interviews during the decommissioning environmental assessment; and specific workshop in 2005 with ACFN, EQC and the on-site cabin owners.

On February 21 and 22, 2005, Orano held a workshop on the decommissioning of the Cluff Lake Project with members of the west side EQC and the ACFN to gain insights into the historic, current, and expected future traditional use of the land. The participants included a trapper from the ACFN, and members of his family, who have seasonally accessed the Cluff Lake area and maintained a trap line in the local study area prior to mine construction and throughout operations. Members of the extended family have maintained cabins on both Cluff Lake and Sandy Lake.

During the workshop, attendees were asked to envision having a cabin on Cluff Lake available for year-round use when advising of land use activities, locations, and time frames. Expected and potential land use was identified as, but not limited to fishing, hunting, berry picking, firewood collection, trapping, wild rice production, herbs and medicine harvesting, gardening, tourism, hiking, swimming, and camping. Attendees then described the amount of time they would spend conducting these activities throughout the year and identified the probable locations for the various activities. The participants agreed that under a scenario with year-round cabin availability at Cluff Lake, approximately 91 days would be spent in the Cluff Lake area, with 25% of the time spent in the immediate Cluff Lake area (~23 days) and 75% of the time would be spent at other lakes including Sandy, Carswell, and Two-Mile lakes.

This advice is supported by known local land use. The family of owners of the traditional resource use cabin on Cluff Lake also own a near-by cabin on Sandy Lake and spend time in northern Alberta and the Northwest Territories. ACFN has identified land use throughout the area. The Cluff Lake area is part of the south-north corridor identified by the CRDN consistent with Orano's understanding of the area as part of a travel route. CRDN has identified areas of cultural significance. Orano is aware of hunters throughout the region that travel Highway 955 north towards, to, and past the Cluff Lake site. The two closest outfitters are located on Sandy and Carswell lakes.

The following are major outcomes of the discussion:

 Traditional land use, while sometimes utilizing land and resources in a small and preferred area, generally involves travelling over a wide area. The decommissioned Cluff Lake footprint is generally considered small relative to areas used for traditional purposes.

Traditional land users would be unlikely to set up a cabin at Cluff Lake given that there are better
fishing lakes in the region. The location could and would more likely be used as a base with most
activities conducted away from this area. Fishing on Cluff Lake would be expected but limited as the
lake is not preferred.

 The mining areas were viewed as unattractive areas for most activities, with the exception of gathering blueberries. With the exception of berry picking, activities were unlikely to be conducted in the small, localized areas affected by mining.

• The vicinity of pit lakes was viewed as unlikely areas for setting up camp. The pits are isolated from the aquatic system and, although remediated for aesthetics and safe surface water quality, traditional users are unlikely to drink water from, or fish on, pit lakes because they are obviously human-made lakes in a region of abundant and known good fishing.

• It is unlikely that a cabin in the area, away from home communities, would be occupied year-round. This feedback is consistent with current cabin use by the family owning a traditional resource user cabin on the shore of Cluff Lake who use the cabin periodically.

Additionally – full time residency was considered in the HHRA - The full-time receptor is assumed to obtain 70% of drinking water from Cluff Lake and 30% from a background lake, such as Carswell Lake, which is a known popular fishing lake.

Results for full time residency are comparable to that of a casual traditional land user, indicating:

• decommissioned Cluff Lake site is safe for people who may hunt, fish, drink water and gather from the site and that the food from and near the site is safe to share with extended families, including children.

#### 3.1.1 Land Use - recommendations

Orano has made the following recommendations regarding land use.

Following successful transfer into the ICP administrative responsibility for the Cluff Lake site will be with the Province of Saskatchewan. Under the ICP, acceptable land uses are defined and administrative controls put into place. Sections 10 and 17 and of the *Reclaimed Industrial Sites Act* describes the ability of the Province to restrict or control access.

Proposed Crown land use (e.g. recreational – cottages; commercial – outfitting; traditional resource use – commercial trapping or fishing) requires application and approval for the applicable lease, permit, easement, or licence to allow authorized use (Government of Saskatchewan 2019). The Ministry of Environment reviews applications to ensure that environmental and resource impacts are considered (including proximity to other land users, buffers from sensitive area(s), and designations that prohibit certain types of development) before issuing a decision.

In consideration of administrative controls, Orano recommends that:

- The decommissioned mine footprint remains with unrestricted access for travel and on-going casual land use. Traditional Resource User cabins and associated casual land use activities of hunting, trapping, fishing, drinking water from Cluff Lake, and gathering berries and tea should remain unrestricted.
- Although the risk assessment presents low risk for full time residency at Cluff Lake, as a prudent measure it is recommended that full-time residency is restricted.

### 4 Engagement Summary

A project-specific Public Information Program has been implemented to ensure interested parties receive information on the decommissioned Cluff Lake Project, the related application to transfer to the IC Program and have an opportunity to express concerns to Orano.

Table 4-1: Engagement related to the 2020 Application

Community/Interest Group	Date	Туре	Comment			
Athabasca Chipewyan First Nation (ACFN) Engagement						
ACFN	03/11/2020	Phone Call	Orano attempt to organize a meeting regarding Cluff Lake decommissioning			
ACFN	03/24/2020	Conference Call	Presented key details and information, including:  Shared Land Use information and Traditional Knowledge  Results of revised Risk Assessment  Long Term Monitoring Plan for Cluff Lake			
ACFN (Joy Flett)	07/13/2020	Mail	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions			
ACFN (Tim Flett)	07/13/2020	Mail	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions			
ACFN (Ed Flett)	07/13/2020	Mail	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions			
ACFN (Meghan Dalrymple)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions			
ACFN	02/18/2021	Email	Orano provided the LTMMP and key information  Orano requested to meet to engage on proposed monitoring locations.			

Community/Interest Group	Date	Туре	Comment
ACFN	03/25/2021	Email	ACFN responded to February 18, 2021 email requesting clarification and Orano to fund the review.
ACFN	03/01/2021	Email	Orano followed up to funding request indicating willingness to consider the request to fund a technical review of the LTMMP and requested a scope and cost estimate for review.
ACFN	03/01/2021	Email	Orano followed up by email regarding the LTMMP and key information previously provided with an offer to meet to discuss LTMMP including identifying monitoring locations that will improve community and land user trust in site safety as well as input on the creation of a public information campaign which will focus on traditional land use and safe harvest of country foods at Cluff Lake.
ACFN	03/18/2021	Email	Orano followed up regarding the development of a funding request to review the LTMMP and key information previously provided with an offer to meet.  No response received.
ACFN	04/09/2021	Email	Orano followed up regarding the development of a funding request to review the LTMMP and key information previously provided with an offer to meet. Particularly to hear ACFN's input on monitoring locations are reflective of traditional land use areas.  No response received.
ACFN	04/09/2021	Email	Orano followed up regarding the development of a funding request to review the LTMMP and key information previously provided with an offer to meet. Particularly to hear ACFN's input on monitoring locations are reflective of traditional land use areas. Orano proposes an April or May 2021 meeting to review and discuss the LTMMP to identify changes to the LTMMP monitoring location to allow for monitoring representative of ACFN Traditional land use. No response received.
ACFN	12/17/2021	Email	Orano provided updated LTMMP, along with a summary of LTMMP engagement attempts, to ACFN with a request for feedback by January 30, 2022.
ACFN	02/22/2022	Email	ACFN responded to Orano's email requesting an update on next steps, further engagement opportunities and funding for both DLRM and engagement costs
ACFN	02/23/2022	Email	Orano responded to ACFN's update request, including:  Extension for LTMMP review feedback to March 31, 2022  Reaffirming that Orano is open to funding review of the LTMMP as per March 1, 2021 email, please provide a cost estimate and scope for the LTMMP review

Community/Interest Group	Date	Туре	Comment
ACFN	03/16/2022	Email	ACFN provided scope and cost estimate for its technical review of the LTMMP.
ACFN	03/18/2022	Email	Orano agreed to fund the proposed scope and budget for ACFN to perform a technical review of the LTMMP. Orano requested confirmation the technical review report would be shared so concerns or shortfalls could be addressed.
ACFN	03/25/2022	Email	Orano requested confirmation from ACFN that the LTMMP technical report will be shared with Orano and proposed a timeline of April 30, 2022 for completion of ACFN's technical review of the LTMMP.
ACFN	03/30/2022	Email	ACFN confirmed the LTMMP technical review report would be shared with Orano and anticipated completing the review by April 14, 2022.
ACFN	04/22/2022	Email	ACFN provided the LTMMP technical review report to Orano.
ACFN	05/25/2022	Email	Orano committed to responding to the ACFN technical review.
ACFN	08/24/2022	Email	Orano emailed rightsholders information on Participant Funding for the Cluff Lake CNSC hearing and attached Cluff Lake fact sheet
ACFN	10/05/22	Email	Orano responded to ACFN technical review, plus associated documents requested in the review as appendices including:
			<ul> <li>Appendix A: CLP Geotechnical Inspection Reports</li> <li>Appendix B: TMA Annual Radon Concentrations (2016-2018)</li> </ul>
			<ul> <li>Cluff Lake Project EP TID 2022</li> <li>Orano also proposed a meeting, if ACFN desires, to discuss the upcoming CNSC hearing and any further feedback on the LTMMP.</li> </ul>
ACFN	10/17/2022	Email	ACFN requested a meeting as proposed and a site tour of Cluff Lake for band members.
ACFN	10/19/22	Email	Orano responded to ACFN's requests:  Proposed a virtual meeting with DLRM in mid November or later  Orano is open to going to Fort Chipewyan; ACFN to provide dates and further information regarding a community presentation  Orano provided a site tour for ten ACFN members on August 30, 2018 and at that time it was communicated to ACFN that it would be the last site tour.
ACFN	10/19/2022	Phone	Orano and ACFN phone call to discuss:

Community/Interest Group	Date	Туре	Comment
			Site tour request and reasons for denial     Not easily accessible and the site has not material changed since the 2018 tour      ACFN requests to sample the water:     Orano indicates the site is open and anyone is free to travel to site to sample water.      ACFN requests Orano travel to Fort Chipewyan to present on the project. Orano confirms willingness to do so. ACFN will provide potential dates.  Orano offered to provide a meal or similar.
ACFN	11/14/22	Email	Orano followed up regarding community meeting date in Fort Chipewyan  No response received
ACFN	12/2/22	Email	Orano followed up regarding community meeting date in Fort Chipewyan  No response received
ACFN	12/5/22	Phone	Orano called and left a voicemail regarding date for community meeting
ACFN	12/09/2022	Email	Orano followed up with ACFN regarding date for community meeting and reminder to issue invoice for the completed LTMMP review.
ACFN	12/12/22	Email	ACFN emailed to discuss additional funding for CNSC hearing intervention
ACFN	12/13/2022	Phone	Orano called ACFN to discuss:  Orano responded that Participant Funding is provided by CNSC for hearing intervention  Orano followed up on possible dates for community meeting date in Fort Chipewyan
ACFN	12/15/2022	Voicemail	ACFN left voicemail regarding no available dates for presenting to the community in Q1 2023.
ACFN	01/18/2023	Email	Orano invited ACFN (DLRM) to participate the Decommissioned Cluff Lake Project-Virtual Information Session on January 25, 2023 and to share the invitation with ACFN community members.
	Clearwater I	River Dene Nati	on (CRDN) Engagement
CRDN	01/09/2020	Meeting	Orano discussed with CRDN how TLU was integrated into Cluff Lake assessments and engagement practices between CRDN and Orano: suggestion that companies should work collaboratively and also Orano should visit the school
CRDN	02/26/2020	Voicemail	Orano received a notification that CRDN will be requesting a meeting to hear information from Orano on Cluff Lake project

Community/Interest Group	Date	Туре	Comment
CRDN	03/04/2020	Text messages	Followed up with CRDN regarding meeting date for Cluff Lake project. Orano confirmed the meeting with various mining companies was Mine Forum scheduled for March 25, 2020 (cancelled due to pandemic) and engagement with Orano on April 23, 2020 (no confirmation on how to proceed with this in pandemic).
CRDN	05/26/2020	Letter (via email)	Orano proposed a meeting (conference call) to discuss key information and engagement, including:  • Update from CRDN on the risk perception/land avoidance studies CRDN conducted  • Delaying school presentations to fall 2020 due to COVID-19 pandemic  • To provide an opportunity for further questions or clarifications.
CRDN	05/28/2020	Email	Indication from CRDN that a formal response from the review of project information was forthcoming
CRDN (Chief Clark)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
CRDN	09/16/2020	Email	Orano requested further information on technical information CRDN would like to receive regarding Cluff Lake in preparation for planned October 2020 meeting. Orano requested to arrange a meeting regarding Cluff Lake; to follow up on previous meeting.
CRDN	09/16/2020	Email	CRDN committed to issuing a formal letter with CRDN requests Not received
CRDN	10/01/2020	Email	Orano shared key information in advance of planned Oct 6, 2020 meeting, including:  Detailed Post Decommissioning Plan: containing recent status as well as detailed summary of past decommissioning activities  Cluff Lake Public Information Program- Appendix 1: a schedule of proposed information sharing opportunities for 2020 and a request for input on activities for the remainder of 2020 and 2021  Also, a link was shared to the Cluff Lake Project video which could be shared freely.
CRDN	10/06/2020	Meeting	Orano provided key project information, including:  Review of Cluff Lake history and current state  And discussed areas of further interest, such as:  Monitoring opportunities

Community/Interest Group	Date	Туре	Comment
			Business opportunities
CRDN	11/06/2020	Email	Orano followed up on October 6, 2020 meeting with requested information:
			<ul> <li>Plain language summaries of the 2019 Cluff Lake Groundwater and Environmental Protection Technical Information Documents (in English and Dene)</li> </ul>
			And Orano proposed establishing a date for the technical team meeting and agenda.
CRDN	11/08/2020	Email	CRDN committed to forwarding a suggested date/time to meet after reviewing Chief Clark's schedule and requested some further information from Orano related to engagement
CRDN	11/20/2020	Email	Orano provided CRDN requested technical and engagement information
CRDN	12/02/2020	Email	Orano provided the LTMMP for discussion at the proposed meeting as well as requested feedback on information sharing opportunities for 2021.
CRDN	12/02/2020	Email	CRDN proposed a meeting date of December 11 at 8:30 am or so. Orano supported the date but requested the time be 9am. CRDN followed up with a phone call to discuss the time and committed to checking Chief Clark's schedule and would confirm with Orano.
CRDN	12/14/2020	Email	No response from CRDN to confirm  Orano requested to arrange a meeting regarding Cluff Lake; to follow up on previous meeting conclusions and action plans  No response
CRDN	01/21/2021	Email	Orano followed up to arrange an engagement meeting
CRDN	01/21/2021	Email	CRDN informed Orano of new engagement contact and process
CRDN	01/25/2021	Email	Orano proposed Feb 4, 2021 meeting to discuss LTMMP and monitoring locations and provided key information:  • LTMMP  • Proposed agenda  No response
CRDN	01/29/2021	Email	Orano followed up regarding proposed meeting on February 4, 2021 CRDN replied with a requested date of February 5, 2021 Orano confirmed date is acceptable
CRDN	01/29/2021	Email	Orano confirmed Feb 5, 2021 meeting and agenda

Community/Interest Group	Date	Туре	Comment
CRDN	02/02/2021	Phone	CRDN confirmed agenda and attendance of four technical team members for the Feb 5, 2021 meeting
CRDN	02/05/2021	Meeting (virtual)	Orano provided key information and details; particularly regarding the LTMMP
CRDN	02/25/21	Email	Orano provided the draft 2021 Cluff Lake Engagement plan for CRDN review and proposed a short phone call between March 1 <sup>st</sup> -5 <sup>th</sup> to discuss next steps.  No response
CRDN	03/09/2021	Email	Orano followed up regarding phone call with CRDN to plan next steps.  No response
CRDN	03/17/2021	Email	Orano provided requested engagement log to CRDN and followed up on requested meeting to follow up on outstanding items.  No response
CRDN	03/19/2021	Email	Orano proposed a call to discuss Engagement plan and key information
CRDN	03/22/2021	Email	CRDN informed Orano of change in engagement lead.  No response on proposed call
CRDN	03/23/2021	Email	Orano requested updated engagement contact process from CRDN
CRDN	03/23/2021	Email	CRDN provided the updated contact process to follow and committed to providing a date for an in- person meeting.
CRDN	04/09/2021		Orano followed up with CRDN to arrange a meeting to discuss engagement items, including:  LTMMP proposed monitoring locations Review of Cluff Lake PIP Co-developing a public information campaign focusing on issues important to CRDN Identify and discuss concerns regarding the process of return of the site to the province under the IC program CRDN committed to responding with a meeting date.
CRDN	04/12/2021	Phone	Orano requested process for engagement on Cluff Lake project
CRDN	04/24/2021	Email	Orano followed up to arrange an engagement meeting CRDN replied with a commitment to provide a meeting date.
CRDN	06/08/2021	Email	Orano provided CRDN a detailed engagement summary as requested
CRDN	08/26/2022	Meeting	Followed up with CRDN regarding LTMMP feedback requested

Community/Interest Group	Date	Туре	Comment
CRDN	09/21/2021	Email	Orano proposes a meeting date to discuss areas CRDN would like further engagement on.  CRDN replied with a commitment to provide a meeting date
CRDN	10/13/2021	Phone	Orano and CRDN arranged to meet for Oct 28, 2021; including draft agenda
CRDN	11/03/2021	Phone	Orano requested to arrange a meeting regarding Cluff Lake CRDN committed to a response by November 12, 2021
CRDN	11/04/2021	Email	CRDN followed up on phone call with a commitment to provide Orano with proposed meeting dates within the next couple of weeks to be held in November.
CRDN	11/05/2021	Phone	CRDN called to arrange a meeting for November 18, 2021. Orano confirmed availability
CRDN	11/10/2021	Email	Orano followed up to phone call to confirm November 18 meeting and agenda  CRDN response was the tentative date was Nov 18 at 10am. Agenda to follow
CRDN	11/15/2021	Email	CRDN postpones planned meeting for November 18, 2021
CRDN	11/16/2021	Email	Orano responds to CRDN postponement of planned meeting; provided LTMMP, map of proposed monitoring locations and Engagement plan with request for feedback by January 15, 2022
CRDN	11/16/2021	Phone	CRDN proposed meeting with Orano as planned on November 18, 2021
CRDN	11/18/2021	Meeting	Introduction to new council members and provide project update.
CRDN	11/24/2021	Email	Orano provided information related to outstanding actions from November 18, 2021 meeting.
CRDN	12/07/2021	Meeting	CRDN, Orano, CNSC, MER meeting
CRDN	12/09/2021	Email	Orano provided LTMMP and proposed monitoring location upon request
CRDN	01/24/2022	Email	Orano provided Cluff Lake project update and LTMMP, with a summary of engagement to date, request for feedback deadline, March 15,2022, and a request to meet.  No response
CRDN	03/15/2022	Email	Follow up to Jan 24 letter requesting meeting/feedback on LTMMP
CRDN	03/31/2022	Email	CRDN replied to March 15 correspondence with a commitment to discuss meeting dates the following week (by April 7, 2022)  No further response

Community/Interest Group	Date	Туре	Comment
CRDN	05/02/2022	Email	Orano requested to arrange a meeting regarding Cluff Lake CRDN response to follow up in the coming weeks to propose a meeting date.
CRDN	05/26/2022	Email	CRDN proposed a meeting regarding Cluff Lake on June 8, 2022 in Edmonton, AB.  Orano confirmed availability.
CRDN	06/01/2022	Email	Orano provided agenda items for June 8 meeting and a draft core storage factsheet for feedback.
CRDN	06/03/2022	Phone	Orano confirmed details for June 8 meeting including attendees and agenda.
CRDN	06/08/2022	Meeting	Orano provided key information including:  Presentation on LTMMP  Information on Human Health Assessment  Exploration Core storage factsheet, with a request for feedback: no feedback provided
CRDN	June 17, 2022 to Aug 29, 2022	Email	Orano and CRDN negotiated a proposal by CRDN for the capacity funding for technical review of the LTMMP.
CRDN	07/28/2022	Email	Orano invited Chief and Council to choose one CRDN member to participate in the Cluff Lake regulatory inspection
CRDN	08/24/2022	Email	Orano emailed rightsholders information on Participant Funding for the Cluff Lake CNSC hearing and attached Cluff Lake fact sheet
CRDN	08/30/22	Email	Orano and CRND finalized a proposal by CRDN for their technical review of the LTMMP. Deliverables include:  • Submission of report to Orano September 22, 2022  • CRDN/Orano meeting to discuss report September 29, 2022
CRDN	09/09/2022	Site visit	CRDN representative participated in the September regulatory inspection of Cluff Lake
CRDN	09/16/2022	Email	<ul> <li>CRDN requested technical documents to facilitate review of LTMMP, including:</li> <li>The CSA 2019 document (Canadian Standards Association (CSA). 2019. Environmental monitoring programs at nuclear facilities and uranium mines and mills. N288.4-19.)</li> <li>Comprehensive Study Report (CSR)</li> <li>Orano Canada Inc. (Orano) 2019a. Hydrogeology and Groundwater Modelling Technical Information Document (GW TID). Version 2</li> </ul>

Community/Interest Group	Date	Туре	Comment
			Orano 2019b. Environmental Performance     Technical Information Document (EP TID). Volume     2 Environmental Risk Assessment. Version 2
			Orano provided requested documents on September 19, 2022
CRDN	09/23/2022	Email	Orano agreed to postpone the LTMMP report date to October 4 and the meeting date to Oct 11, 2022 on CRDN's request
CRDN	10/11/2022	Email	Orano followed up to determine status of LTMMP review
CRDN	10/11/2022	Email	Received CRDN draft comments on LTMMP. A new meeting date will be discussed.
CRDN	10/19/2022	Email	Orano followed up with CRDN regarding the final version of LTMMP review and meeting date. Orano proposed mid November 2022
			CRDN responded that the final version was not complete and the proposed date was acceptable . CRDN will circulate a meeting invite.
			No meeting date proposed
CRDN	11/14/2022	Email	Orano followed up with CRDN regarding the final version of LTMMP review and meeting date.
			CRDN responded anticipating the LTMMP review report completion within the next week
CRDN	12/17/2022	Email	CRDN provide final LTMMP review report
CRDN	1/17/2023	Email	CRDN followed up LTMMP review report. Orano responded review of comments is ongoing. Discussion regarding meeting dates on the week of Feb 1, 2023
CRDN	1/18/2023	Email	Invitation to Virtual Information session
			Information presented from Orano and Ministry of Energy and Resources
CRDN	2/01/2023	Email	CRDN communicated Feb 3, at 10am for a meeting but no confirmation received.
CRDN	2/06/2023	Email	Orano provided response to comments in CRDN LTMMP review report. CRDN acknowledged receipt.
Métis Nation of Saskatchewan (MN-S) Engagement			
MN-S	05/04/2019	Email	Orano provided information and map for an unaccompanied planned site visit.
MN-S (Northern Region #2)	09/17/2019	Site Visit	Orano coordinated a site visit. Participants toured following areas, the Claude Mining Area, DJ Mining Area, Tailings Management Area

Community/Interest Group	Date	Туре	Comment
MN-S (Buffalo Narrows Local)	09/17/2019	Site Visit	Orano coordinated a site visit. Participants toured following areas, the Claude Mining Area, DJ Mining Area, Tailing Management Area
Métis Local #39 (La Loche) (President St. Pierre)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Métis Local #37 (Beauval) (President Daigneault)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
MN-S Northern Region 2 (Regional Director Leonard Montgrand)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
MN-S Northern Region 3 (Regional Director Mervin (Tex) Bouvier)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Buffalo Narrows Métis Community Council (Laliberte)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Métis Local #62 (Buffalo Narrows) (President Chartier)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Métis Local #62 (Buffalo Narrows) (Member- Marlene Hansen)	07/17/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
MN-S (Regional Director, Northern Region 2 Director, La Loche Local Metis President	09/28/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions

Community/Interest Group	Date	Туре	Comment
MN-S	01/29/2021	Meeting	Meeting to provide key information and discuss MN-S process for engagement on Cluff Lake.
MN-S	02/11/2021	Email	Provided key information and additional information requested during Jan 29,2021 meeting to MN-S Northern Region 2 and MN-S Northern Region 3 (also MN-S Environment Minister), including
			Draft LTMMP
			Orano propose a meeting date in early March 2021
MN-S	03/10/2021	Email	MN-S distributed LTMMP to Northern Region 3 presidents
MN-S	04/15/2021	Meeting	Provided key information and discussion, including:
			<ul> <li>LTMMP monitoring locations; MN-S asked if Métis harvesting areas could be added to the map. Orano agreed it could be done.</li> <li>2021 Engagement plan review: feedback included translation of radio communication to Michif and information sharing about the safety of country foods.</li> </ul>
			Agreed to meet again in a week to continue
MN-S	04/21/2021	Meeting	Continuation of April 15, 2021 meeting- provided key information.
			MN-S directed Orano to provide MN-S technical team information for review and feedback. Request for further information, including meetings, will come from MN-S technical team.
MN-S	04/28/2021	Email	Provided information as requested at April 21, 2021 engagement meeting, including:
			Draft LTMPP
			Figure of proposed monitoring locations
			Slide deck from April 21, 2021 meeting     Sliff Lake 2010 Emilian reported Surrengers
			<ul><li>Cluff Lake 2019 Environmental Summary</li><li>Cluff Lake 2020 Factsheet</li></ul>
MN-S	06/07/2021	Email	Orano followed up with MN-S technical team to see if
C-VIIVI	00/07/2021	Email	further information or clarification was required regarding the information provided on April 28, 2021
MN-S	06/23/2021	Email	MN-S technical team requested further information on two items.
			Orano responded to both items on June 25, 2021

Community/Interest Group	Date	Туре	Comment
MN-S	06/29/2021	Email	MN-S technical team provided comment on information provided.
MN-S	07/06/2021	Email	Orano response to MN-S requests following LTMMP review.
MN-S	12/17/2021	Email and Letter	Orano provided MN-S updated LTMMP reflecting feedback received to date and monitoring locations with cultural significant areas.
			Orano requested feedback by January 20, 2022 and offered to meet.
			Information provided to MN-S Vice President of (???), MN-S Northern Region 2 Director, MN-S Northern Region 3 Director, NR 2 and NR 3 Métis Local Presidents
MN-S	01/24/2022	Meeting	Orano met with MN-S leadership. Key items discussed:
			<ul><li>Engagement process with MN-S</li><li>Update on Cluff Lake Project</li></ul>
			Request for feedback on previously provided LTMMP monitoring locations.
MN-S	01/24/2022	Email	Orano provided technical information requested by MN-S, including:
			<ul> <li>LTMMP (current draft)</li> <li>Figure of proposed monitoring location and cultural significant areas</li> <li>Cluff Lake 2015 Environmental Performance TID</li> <li>Cluff Lake 2019 Groundwater TID</li> </ul>
MN-S	02/03/2022	Email	Orano confirmed with MN-S the technical documents requested were sent and offered to meet to discuss Cluff Lake project further.
			MN-S responded (Feb 23, 2022) committing to discussing a follow up meeting after the review of the documentation, likely the following week
MN-S	03/15/2022	Meeting	Orano met with MN-S to provide an update and discuss the Cluff Lake project, including Orano funding a review of the technical documents. MN-S to provide proposal and budget.
MN-S	04/29/2022	Email	Orano provided additional information regarding LTMMP and process for providing capacity funding for LTMMP review.
MN-S	06/14/2022	Email	MN-S provided funding proposal for technical review of Cluff Lake LTMMP

Community/Interest Group	Date	Туре	Comment
MN-S	07/05/2022	Meeting	MN-S and Orano discussed proposal for technical review of Cluff Lake LTMMP  MN-S and Orano discussed the proposal details and costs until July 26, 2022 when an agreement was achieved.
MN-S	07/26/2022	Email	Orano agreed to fund the proposed scope and budget for MN-S to perform a technical review of the LTMMP. The agreed upon completion date is September 15, 2022.
MN-S	07/28/2022	Email	Orano invited MN-S to choose one representative to participate in the Cluff Lake regulatory inspection on September 9, 2022
MN-S	08/09/2022	Email	MN-S representative indicate transition at MN-S and provided alternate MN-S representative for the September 9, 2022 Cluff Lake regulatory inspection
MN-S	08/18/2022	Email	Orano sent MN-S details for the September 9, 2022 Cluff Lake regulatory inspection, with the request to inform Orano if participation plans change.  No response
MN-S	08/24/2022	Email	Orano emailed rightsholders information on Participant Funding for the Cluff Lake CNSC hearing and attached Cluff Lake fact sheet
MN-S	08/29/2022	Email	Orano followed up with MN-S regarding details for the September 9, 2022 Cluff Lake regulatory inspection  No response
MN-S	09/07/2022	Email	Orano followed up with final details and itinerary for the September 9, 2022 Cluff Lake regulatory inspection.  *unfortunately, the representative responded and cancelled and MN-S declined to send a replacement
MN-S	09/20/2022	Email	Orano received LTMMP technical review.
MN-S	10/31/2022	Email	Orano provided response to LTMMP comments
MN-S	12/9/2022	Email	Orano emailed offering follow up discussion on LTMMP responses and any outstanding concerns.
MN-S (Northern Region 2 Director)	1/09/2023	Meeting	MN-S NR-2 Regional Director and MN-S met with Orano personnel to discuss Cluff Lake.
MN-S	1/18/2023	Email	Invitation to Virtual Information session on January 25, 2023

Date	Туре	Comment
		Information presented from Orano and Ministry of Energy and Resources
1/18/2023	Email	MN-S invited Orano to a joint meeting on February 16, 2023 with NR 2, MN-S, Two Worlds, CNSC, Orano and GOS to discuss issues and concerns identified in MN-S technical review.  • Orano responded personnel could attend virtually but not in person due to prior commitments.
02/16/2023	Meeting	Meeting with MN-S NR-2 Director, Presidents and Board members to discuss the LTMMP and the process to transfer Cluff Lake to the IC Program
Basi	n Communitie	es (Ya'thi Néné)
04/22/2020	Meeting	Presented key details and information
04/22/2020	Meeting	Presented key details and information
07/01/2020	Media	Newsletter article providing key details regarding Cluff Lake.
07/17/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
08/24/2022	Email	Orano emailed rightsholders information on Participant Funding for the Cluff Lake CNSC hearing and attached Cluff Lake fact sheet
12/5/2022	Meeting	Orano presented key details on the LTMPP
12/5/2022	Meeting	Orano presented key details on the LTMPP
12/8/2022	Email	YTN-LRO requested Orano present Cluff Lake information to Athabasca Land Protection and YTN Board. Orano personnel unavailable on suggested date, proposed YTN-LRO provide alternate date.
4/40/2222		No response from YTN-LRO
1/18/2023	Email	Invitation to Virtual Information session Information presented from Orano and Ministry of Energy and Resources
1/30/2023	Email	Provided YTN-LRO the recording of the virtual information session, as requested
Oth	er Indigenous	Rightsholders
	1/18/2023  Basi 04/22/2020 04/22/2020 07/01/2020 07/17/2020  08/24/2022 12/5/2022 12/5/2022 12/8/2022 11/18/2023	1/18/2023 Email  02/16/2023 Meeting  Basin Communities 04/22/2020 Meeting 04/22/2020 Meeting 07/01/2020 Media 07/17/2020 Email  12/5/2022 Meeting 12/5/2022 Meeting 12/5/2022 Meeting 12/8/2022 Email

Community/Interest Group	Date	Туре	Comment
Resource Land User, Métis	08/28/2019		Orano invited individual to Cluff Lake site tour.
Resource Land User; ACFN	09/25/2019		Orano responded to a land user regarding Cluff Lake concerns
Resource Land User	02/26/2020		Orano discussed sampling location with land user
Resource Land User (Emile Burnouf)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Resource Land User (Ernest McDonald, Métis)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Resource Land User (Germaine Mercredi, Métis)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Resource Land User (Brian and Shelly McDonald)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Birch Narrows First Nation (Chief Sylvester)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
Birch Narrows Dene Nation	11/29/2022	Phone	Orano called BNDN in response to message
Birch Narrows Dene Nation	11/29/2022	Email	Orano provided LTMMP to BNDN, as requested
Birch Narrows Dene Nation	12/02/22	Email	BNDN requested meeting; Orano proposed dates.
Birch Narrows Dene Nation	12/13/2022	Email	Orano followed up with BNDN regarding meeting dates
Birch Narrows Dene Nation	01/09/2023	Meeting (virtual)	Orano met with BNDN leadership
Birch Narrows Dene Nation	1/18/2023	Email	Invitation to Virtual Information session Information presented from Orano and Ministry of Energy and Resources

Community/Interest Group	Date	Туре	Comment
Birch Narrows Dene Nation	2/14/2023	Meeting	Orano met with BNDN leadership
Buffalo River Dene Nation (Chief Morrison)	07/13/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
NSEQC	07/17/2020	Email	Cluff Lake update mailed; including notification regarding Orano's request to revoke the Cluff Lake mine licence; summary of feedback Orano heard during 2019 hearing process; a Cluff Lake Factsheet and Risk assessment summary; request for follow up discussions
NSEQC	04/21/2022	Email	Provided Cluff Lake ERA Factsheet
NSEQC	08/24/2022	Email	Orano emailed rightsholders information on Participant Funding for the Cluff Lake CNSC hearing and attached Cluff Lake fact sheet
Public (Northern SK)	11/2020	Radio	Radio interviews on northern Saskatchewan radio stations (MBC) provided project information and update on Cluff Lake.
Public (Northern SK)	12/2022	Mail	Mass mailout of Core Storage factsheet
Public (Northern SK)	12/2022	Radio	Radio spots (Cluff Lake Update: English, Dene, Western Michif)
Public (Northern SK)	01/2023	Mail	Mass mailout of Cluff Lake ERA factsheet
Public (Northern SK)	01/25/2023	Meeting	Public Virtual Information session     Information session details shared on northern radio, social media and emailed to Indigenous Nations and communities and known interested parties     Information presented from Orano and Ministry of Energy and Resources
Public (Northern SK)	02/2023	Radio	Radio spots (Cluff Lake Update: English, Dene, Western Michif)

## 4.1 Key Actions/Initiatives Resulting from Engagement

Rightsholders	Recommendation/Concern	Action
CRDN – included in CRND review of Cluff Lake LTMMP	<b>Safety:</b> CRDN members have expressed serious concern regarding their personal safety living with the results of the Cluff Lake mine project	Orano continues to meet and engage with CRDN leadership and consultants to better understand the concerns and determine preferred methods in communicating with community members. Direct contact with some community members shows that people are using the site for traditional activities
CRDN – included in CRND review of Cluff Lake LTMMP	Land Use: CRDN members have expressed serious concern regarding their inability to utilize their land as they choose. CRDN members are wary to exercise their rights to cultural activities within their traditional territory. These activities may include traditional harvesting rights for individuals and the community and/or commercial purposes.	The site has unrestricted access, Orano has been meeting with CRDN leadership and consultants better understand the concerns and determine preferred methods in communicating the safety of the site and country foods with community members
CRDN – included in CRND review of Cluff Lake LTMMP	Occupancy: CRDN members have expressed serious concern regarding their inability to freely occupy areas of their traditional territory to undertake cultural activities to maintain a close familial network and ensure the intergenerational transmission of knowledge.	The site has unrestricted access, Orano has been meeting with CRDN leadership and consultants better understand the concerns and determine preferred methods in communicating the safety of the site and country foods with community members
CRDN – included in CRND review of Cluff Lake LTMMP	Future Use and Value: CRDN members have expressed serious concern regarding land that they consider valueless.	The site has unrestricted access, Orano has been meeting with CRDN leadership and consultants better understand the concerns and determine preferred methods in communicating the safety of the site and country foods with community members
CRDN – included in CRND review of Cluff Lake LTMMP	Best Practices: CRDN members have expressed serious concern regarding their understanding of the Best Practices undertaken throughout the years of mining as well as the decommissioning testing and future monitoring within their traditional territory.	Orano has met with CRDN leadership and consultants to present on decommissioning activities, post-decommissioning monitoring and the LTMMP. These meetings included opportunities for Q&A.
CRDN – included in CRND review of Cluff Lake LTMMP	Consultation and Engagement: CRDN have expressed concerns that the project at Cluff Lake failed to Consult their membership from inception up to and including the LTMMP. Members have remarked at the purposeful exclusion of their participation in the development and proposed execution of the LTMMP. This lack of Consultation has taken away the Nation's ability to have any say or control over the use of lands and surrounding areas.	Orano has been engaging with and requesting input from CRDN on the LTMMP and its revisions since December 2020 in a variety of methods. Orano continues to listen and engage.

Rightsholders	Recommendation/Concern	Action
MN-S – review of LTMMP	Requested a summary of MN-S involvement in decommissioning	Orano provided a response regarding its long history of engaging with Métis. With the majority of decommissioning being conducted prior to 2006, the majority of engagement occurred through Métis Locals within NR2, Métis Northwest Council Representatives and through Métis representation on the Northern Saskatchewan Environmental Quality Committee.
		The status of decommissioning was subject to review during the 2019 public hearing with the Commission, of which MN-S intervened. Orano continue to engage with MN-S on establishing engagement protocols, and the review of the LTMMP.
MN-S – review of LTMMP	Request for EP TID	EP TID was provided to MN-S in February, March and May 2022.
MN-S – review of LTMMP	Request clarification on how casual use was determined.	Orano provided a fulsome response on the developing the criteria related to casual use – through a workshop held with rightsholders, including Métis representation
MN-S – review of LTMMP	Confirm Métis involvement in identifying vegetation used for re-vegetation program	Decommissioning planning and discussions primarily occurred with Métis Locals, within NR2 regarding the Cluff Lake Project. Engagement has typically been with the Métis Local representatives, Métis Northwest Council Representatives or through their representation on the Northern Saskatchewan Environmental Quality Committee.  The discussions regarding revegetation included
		discussions with the EQC regarding the seeding program
MN-S – review of LTMMP	Questions/clarifications regarding MN-S future involvement with the LTMMP	As administrators of the land and the LTMMP, the Province of Saskatchewan can conduct environmental risk assessments and or human health risk assessments should future monitoring indicate potential performance issues/concerns.
		Funds have been included in the calculations for the province to carry out the LTMMP for outreach and engagement with stakeholders and land users
MN-S – review of LTMMP	Request to be included in the selection of sampling locations	The scope of Orano's request for the MN-S to review the LTMMP included reviewing and suggesting sampling locations

Rightsholders	Recommendation/Concern	Action
MN-S – review of LTMMP	Requested clarification regarding restrictions on full-time residency	The Human Health Risk Assessment concluded that casual and full-time residency were safe; however, portions of the Cluff Lake site entering the institutional control program are limited to those areas where land use restrictions are needed to protect features of decommissioning. For example, the tailings management area and Claude waste rock piles are covered with glacial till and vegetated to reduce surface water infiltration. Orano has recommended residency restrictions to protect these areas from disturbance.
MN-S – review of LTMMP	Inquiries regarding wildlife exposure to metals	Orano provided a summary of the Risk Assessment conducted in 2019 which demonstrates there is an absence of unreasonable risk now and over the long-term
MN-S – review of LTMMP	Clarification on COPCs monitored through the LTMMP	Response provided
MN-S – review of LTMMP	Clarification requested on selection of reference lakes	Response provided
MN-S – review of LTMMP	Clarification requested on sediment, benthic and fish tissue sampling program	Response provided
MN-S – review of LTMMP	Clarification on frequency of program and ability to make adjustments in the future	Response provided – noting the Province of Saskatchewan will have the authority to adjust the program, if required
MN-S – review of LTMMP	Concerns regarding geotechnical inspections and repairs of erosion	Orano provided a response regarding the frequencies of geotechinical inspections and the determination of when repairs are required
ACFN – review of LTMMP	Request for more information regarding the Geotechnical Monitoring and Inspection plan	Orano provided more details, as well as past geotechnical inspection reports; in response to ACFN feedback, Orano provided additional language to the geotec section of the LTMMP
ACFN – review of LTMMP	Request for EP TID	Orano provided responses with information and conclusions from the EP TID; Orano provided ACFN with a copy of the EP TID
ACFN – review of LTMMP	Clarifications requested regarding vegetation surveys	Response provided
ACFN – review of LTMMP	Clarifications requested regarding burrowing animals	Response provided
ACFN – review of LTMMP	Additional information regarding studies of ponded water on TMA	Response and additional provided (summary of the ERA conducted on ponded water)

Rightsholders	Recommendation/Concern	Action
ACFN – review of LTMMP	Requested Radon gas monitoring records	Provided
ACFN – review of LTMMP	Clarification regarding groundwater transport from open pits to waste rock piles	Information provided
ACFN – review of LTMMP	Clarification on frequency of program and ability to make adjustments in the future	Response provided – noting the Province of Saskatchewan will have the authority to adjust the program, if required
ACFN – review of LTMMP	Clarification on COPCs monitored through the LTMMP	Response provided
ACFN – review of LTMMP	Clarification requested on sediment, benthic and fish tissue sampling program	Response provided
ACFN – review of LTMMP	Request for additional information on definition of casual land users; risks	Orano provided a fulsome response on the developing the criteria related to casual use – through a workshop held with rightsholders, including ACFN representation
		Provided a summary of the HHRA conclusions; provided the EP TID, which includes the HHRA
ACFN – review of LTMMP	Requested the application of more stringent water quality guidelines and to update the LTMMP; requests the application of water quality guidelines established through Health Canada, WHO and US EPA.	Orano's response notes that the site meets decommissioning water quality guidelines, as established through the EA process; modelling predicts the site will remain safe and stable for the far future.
		ERA and HHRA conclude that the site is safe for traditional land uses, including hunting, fishing, drinking water and collection of berries
		Therefore, more stringent surface water quality guidelines are not required. On-going long-term monitoring is in place to monitor and identify changing trends. Should performance decline, the Province of Saskatchewan may impose restrictions or actions to address. Orano provides the funding to accommodate long-term monitoring, maintenance and unforeseen events.
ALL indigenous intervenors	Inquiries regarding implementation of LTMMP, including procurement, reporting, engagement and	Orano has advised that these items will be the responsibility of the province, as administers of the LTMMP

<sup>\*</sup>table updated to include correspondence directly provided between Orano and Rightsholders, currently does not include concerns raised throught submission of interventions provided to the CNSC for the March 1 public hearing

## 4.2 Planned Engagement

The activities outlined below are currently proposed for 2022; however, their schedule and/or nature may be amended as required to meet objectives, special requests, timelines and resources.

2022/2023	Action
Q3	Distribution through direct mail-out to stakeholders correspondence providing an update on the regulatory process (final steps, new property contacts, etc.) for the transfer to the Institutional Control Program.
	include a list of common public concerns and responses
Q3/Q4	Creation of public information campaign(s) focusing on traditional land use and safe harvest at the Cluff Lake Project site
Q3/Q4	Re-air the Cluff Lake Project Q4 2020 radio campaign in English, Cree and Dene; post these radio recordings on social media.
Q3/Q4	Follow-up conversations/meeting with local Indigenous leaders, when requested.
Q3/Q4	On-going discussions with stakeholders pending their review of the LTMMP
Q3/Q4	Follow up on outreach opportunities identified through discussions with leadership in the previous quarters.
Q4 through Q1 2023	Follow up on outstanding actions

## 5 Engagement Records

## 5.1 Stakeholder Issues and Information Management System (SIIMS) Database

Accurate Recording of Engagement Outcomes: Orano strives to record questions, comments, and concerns made through written correspondence (letters or emails) and during focus meetings, open houses, and telephone calls. These questions, comments, and concerns are assessed to determine issues or trends in level of interest in projects and project aspects, areas for improvement, areas of misunderstanding, as well as to continuously improve communication and engagement tools. Orano strives to respond to inquiries, concerns, and questions from groups and individuals that are submitted or gathered. The responses may be further disseminated through our publications, social media posts, or through direct emails. Orano keeps records of its engagement activities and questions or comments made by stakeholders

**SIIMS:** Orano keeps records of interactions and engagement with stakeholders in its Stakeholder Issues and Information Management System (SIIMS) database, which constitutes a repository of questions, comments and feedback received from stakeholders throughout the year. For ease of analysis of the records, these interactions are tagged per themes such as socio-economics (jobs, training, donations and sponsorships), biophysical environment, regulatory process, traditional knowledge, etc.

A summary of the records will be provided to regulators through project submissions, applications, engagement reports or as a part of hearing material.