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

**Mémoire de l'Athabasca Joint  
Engagement and Environmental  
Subcommittee**

**Regulatory Oversight Report for  
Uranium Mines and Mills in Canada:  
2022**

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**Rapport de surveillance réglementaire  
des mines et usines de concentration  
d'uranium au Canada : 2022**

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Commission Meeting

Réunion de la Commission

December 13-14, 2023

13-14 décembre 2023

November 13, 2023

Georgie McDonald  
General Delivery  
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Re: Intervention letter on Regulatory Oversight Report (ROR) for Uranium Mines and Mills in Canada: 2022

Dear Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am providing a letter regarding the 2022 ROR for Uranium Mines and Mills in Canada.

The seven Athabasca Basin communities (including the Denesų́liné 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 Agreement<sup>1</sup> (CA) in 2016 with Cameco and Orano. The Agreement confirms the partnership between the communities and industry in development of uranium resources in the Athabasca Basin relative to the existing operations. The Agreement also builds on an impact management agreement signed in 1999, and is structured on five pillars of workforce development, business development, community investment, community engagement, and environmental stewardship.

Since the agreement was signed, a total of \$867.7 million has been spent on business development, community contributions, and workforce development. In 2022, the CA Annual Progress Report to communities detailed the investment accomplished by those involved under the agreement and noted a total of \$163.7 million spent in 2022 under the pillars.

Under the agreement, AJES was created and appointed as the primary liaison between Cameco, Orano, and the Athabasca First Nations and Athabasca communities for the sharing of environmental monitoring and other environmental information. AJES serves as the first point of contact for Cameco and Orano with respect to community engagement.

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<sup>1</sup> 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.

The Ya'thi Néné Lands and Resource Office (YNLR) was also created by 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.

Cameco and Orano established and maintained relationship with the Athabasca communities prior to the CA. For over two decades, Cameco and Orano have engaged with Athabasca residents through subcommittees such as the Athabasca Working Group, the Environmental Quality Committee and through direct communication with community members and Leadership.

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 Denesų́liné First Nation
- 1 representative from Hatchet Lake Denesų́liné First Nation
- 1 representative from Fond du Lac Denesų́liné First Nation
- 1 representative for the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, Wollaston Lake)
- The Executive Director of the YNLR

To support AJES, the Community Liaisons also attend AJES meetings 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 about Cameco and Orano's operations so that concerns can be address by company representatives. Discussions range from exploration to decommissioning, including the decommissioned sites and environmental performance. As appointed community members, AJES representatives also play an important role for the companies by providing advice on community engagement strategies for planned and future site-based projects. As such, the AJES is a conduit for sharing of information between companies and communities, which is the process defined together under the agreement. The AJES, with support from the YNLR and the community liaisons, work to ensure operational and regulatory updates are provided to the Athabasca Basin communities in an effort to ensure community members are informed and concerns are heard.

One of the roles of AJES is to review the Community-Based Environmental Monitoring Program (CBEMP). CBEMP conducts environmental monitoring throughout the Athabasca Basin, and is similar in scope to its predecessor, the Athabasca Working Group (AWG) environmental monitoring program. Since 2000, these programs have routinely demonstrated that samples collected near Athabasca communities are not negatively impacted by active uranium mining and milling operations in the region. The CBEMP continues to show the health benefits of consuming traditional country foods, and that traditional foods and water near these communities remain safe.

As a result, regular consumption of locally collected fish, meat and vegetation is encouraged, while respecting the water and fish advisories.

Each year, the CBEMP focuses on a single community area to conduct a dietary food survey and associated monitoring. Initiated in 2018, the CBEMP has been successfully completed in Stony Rapids, Black Lake, Fond du Lac, Hatchet Lake, Wollaston Lake, Uranium City and Camsell Portage, with results presented to Leadership and community members. In addition, a Human Health Risk Assessment was conducted for each community in 2023 using CBEMP data collected over the past several years. The HHRA results show that the food is safe for consumption, and that community members should continue regularly eating locally harvested fish, wild game, berries, and plants.

AJES is familiar with the Eastern Athabasca Regional Monitoring Program (EARMP), which also supports environmental monitoring, and that this program is partially funded by the Canadian Nuclear Safety Commission. Similar to the CBEMP program, EARMP continues to demonstrate that country foods remain safe and do not pose a risk to Athabasca Basin communities. 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 YNLR 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.

The AJES has received information about the operations, both while in operation and during care and maintenance, included in the 2022 ROR submission.

Sincerely,



Georgie McDonald AJES – Fond du Lac Denesuline First Nation

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