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**Written submission from the
Canadian Nuclear Workers'
Council**

**Mémoire du Conseil canadien des
travailleurs du nucléaire**

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

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

Commission Meeting

Réunion de la Commission

December 13-14, 2023

13-14 décembre 2023



Canadian Nuclear Workers' Council

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November 13, 2023

Members of the Commission

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CNSC Staff's Annual Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2022 Reference 2023-M 37

Dear President Berube and Members of the Commission,

Please accept this letter as the written submission from the Canadian Nuclear Workers' Council (CNWC) for the Public Meeting scheduled for December 13/14, 2023 regarding CNSC Staff's Annual Regulatory Oversight Report (ROR) for Uranium Mines and Mills (UMM) in Canada: 2022, reference CMD 23-M 37.

The Canadian Nuclear Workers' Council

The CNWC was formed in 1993 as an association of Unions with Members employed across Canada's nuclear industry, including: uranium mines and mills, nuclear fuel manufacturing, nuclear power plant (NPP) operation and maintenance, NPP construction and refurbishment, engineering, medical isotope production, nuclear research and development, nuclear waste management and decommissioning.

Two CNWC Affiliated Unions represent Workers at Uranium Mines and Mills covered by this report. The United Steel Workers (USW) represents Workers employed by Cameco at their Key Lake and McArthur River Operations as well as Workers employed by Athabasca Catering Limited Partnership (ACLP) at Key Lake, McArthur River and Cigar Lake. Unifor represents Workers employed by Orano Canada.

The goals of the CNWC are to ensure the perspectives of Canada's Nuclear Workers are heard by decision makers, strengthen the collective role of Nuclear Workers via their Unions as partners in Canada's Nuclear Industries, and enhance public knowledge about

Canada's Nuclear Industry. To do this we prepare policy papers and a regular newsletter, post relevant information on our website <https://cnwc-cctn.ca> and social media, hold annual conferences at the various communities hosting Canada's nuclear facilities, and participate in the regulatory process. Our 2024 conference will be returning to Saskatoon.

The standards of occupational health and safety and environmental stewardship in Canada's nuclear industry are consistently very high and safeguarding those high standards is the priority for all CNWC Affiliates. When our workplaces are safe it's better for the environment and we know that safer workplaces give rise to safer communities.

In preparation for this submission we reviewed Commission Member Document, CMD 23-M 37 (ROR for UMMs in Canada: 2022) submitted by CNSC Staff.

We support CNSC Staff's assessment and their conclusions. Radiation protection programs, environmental protection programs and conventional health and safety programs have all been effective. Canada's Uranium Mines and Mills continued to operate safely in 2022. We note the opportunities for improvement identified by CNSC Staff.

Concluding Remarks

We believe that Cameco and Orano continue to make adequate provisions for the health, safety and security of workers, the public and the environment.

We value CNSC Staff's Annual Regulatory Oversight Reports. They help maintain confidence and engagement.

Thank-you to the Commission, CNSC Staff and everyone participating in this process. A transparent public process and strong regulatory oversight help maintain the high level of health and safety in our workplaces and our communities.

Respectfully submitted,

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