



CMD 25-H3.12B

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Supplementary Information

Renseignements supplémentaires

Presentation from the Athabasca Chipewyan First Nation (ACFN)

Présentation de la Première Nation des Chipewyan d’Athabasca (ACFN)

In the Matter of the

À l’égard de

Cameco Corporation, Beaverlodge Project

**Cameco Corporation, le projet de
Beaverlodge**

Application for the Licence Revocation and
Transfer of Properties to Saskatchewan
Institutional Control Program

Demande de révocation de permis et de transfert
de propriétés au programme de contrôle
institutionnel de la Saskatchewan

Commission Public Hearing

Audience publique de la Commission

January 30, 2025

30 janvier 2025

Application to release the final set of decommissioned Beaverlodge mine and mill site properties from CNSC licensing for acceptance into Saskatchewan's Institutional Control Program, resulting in the revocation of its waste facility operating licence

Presentation for the January 30, 2025 Hearing

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ACFN
DENE LANDS AND RESOURCE
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Introduction



VISION

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

MISSION

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



ACFN Elders' Declaration on Rights to Land Use

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

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

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

Beaverlodge is located within ACFN's traditional territory.



ACFN's Members continue to exercise their Aboriginal and treaty rights within this area.



30 different traditional land-use sites are within 10 kilometers of Beaverlodge. 6 are within Beaverlodge's footprint.



Water from Beaverlodge Lake flows to Athabasca Lake via Martin Lake, Cinch Lake, Crackingstone River, and Crackingstone Bay.

The Beaverlodge mine and mill were created without ACFN's consent or consultation.

The deposit of 5,800,000 tonnes of tailings into waterbodies located within ACFN's traditional input was done without ACFN's consent or consultation.

ACFN did not benefit from the Beaverlodge developments.

The impacts of the Beaverlodge development on ACFN's lands, rights and way of life continue to this day.

Previous Elder Testimony

“...the fish were beginning to taste like gas including the waters and anything that drank from the lake...”

“...we had traps around the mine sites, the caribou loved coming to this area because of the natural salt on the land, they used to come and lick the salt, I went there once and it wasn't a nice place anymore, and I never ever went back there again...”

“...they say they cleaned the lands, they buried most of their poison and covered it with white sand, but we know as Dene that the harm and damages that have occurred will never ever regain its true essence of how the purity the land was before the white man came and destroyed it...”

Because of the ongoing impacts of the Beaverlodge developments on ACFN rights, the duty to consult and accommodate ACFN by the Crown is on the deepest end of the consultation spectrum.

The Commission, as a final Crown decision-maker, must ensure that the DTCA is honourably discharged, as the contemplated decision amounts to Crown conduct.

In this situation, the honour of the Crown requires the Commission to consider and accommodate ACFN's concerns.

The Commission is obligated to ensure that further harms to ACFN's Aboriginal and Treaty rights will not occur before releasing these properties from CNSC licensing.

ACFN's Position



ACFN does not support Cameco's application

ACFN reviewed the Application and commissioned three expert reports:

- **Monique Dube**, *Technical Review of Cameco Corporation Application- Beaverlodge Mine Decommissioning*
- **Megan Thompson**, *Technical Review of Cameco Corporation's Beaverlodge Mine Sites Request to Revoke the Current Licence and Release Project to the Institutional Control Program - surface water quality and aquatic ecosystems*
- **Mandy Olsgard**, *Cameco Corporation Request to Revoke the Current Licence and Release the Beaverlodge Project to the Institutional Control Program –Health Risk and Toxicology Review*

Key Expert Conclusions

- Performance Objectives are not being met
 - Concentrations of Radium-226, Selenium, and Uranium in surface water to exceed the Saskatchewan Environmental Quality Guidelines (SEQGs) by up to 25 times.
- Performance Objectives, indicators and criteria do not align with Government of Saskatchewan's decommissioning guidelines and decommissioning objectives at other Uranium mines.
- Indigenous Peoples are not able to properly practice traditional lifestyles, and managing risk through advisories for drinking water and fish is insufficient.
- Not technically valid to state with certainty that the monitored systems are responding as predicted.

Monique Dube

*Technical Review of Cameco Corporation
Application- Beaverlodge Mine Decommissioning*

Written Submissions, **Appendix "A"**



Key Findings

- The decommissioned properties are not yet ready to be transferred to the ICP.
 - Not sound rationale to claim a Tailings Management Area is environmentally safe and yet fails to meet environmental protection guidelines.
 - Cameco's proposal negates its accountability for monitoring, adaptive management, and to ensure active restoration of the rights of Indigenous Peoples.

Megan Thompson

*Technical Review of Cameco Corporation's
Beaverlodge Mine Sites Request to Revoke the
Current Licence and Release Project to the
Institutional Control Program - surface water quality
and aquatic ecosystems*

Written Submissions, **Appendix “B”**



Key Findings

There are concerns with the monitoring data and modeling.

- The monitoring data shows that existing water quality is not meeting the defined objectives.
- The time period for which monitoring and modeled concentrations overlap is too short to validate the modeled concentrations.

Mandy Olsgard

Cameco Corporation Request to Revoke the Current Licence and Release the Beaverlodge Project to the Institutional Control Program –Health Risk and Toxicology Review

Written Submissions, **Appendix “D”**



Key Findings

Unclear how the properties are meeting the requirements for remediation and release.

- Performance objectives, indicators, and criteria are not risk-based and do not align with Northern Mine Decommissioning and Reclamation Guidelines (Saskatchewan Ministry of Environment, 2008) or Long Term Monitoring Plans (LTMPs) and decommissioning objectives at other Uranium mines in Saskatchewan.
- The LTMP does not adequately consider or measure contamination of sediment, groundwater, aquatic plants and invertebrates and non-aquatic biota.
- Fish and Water Consumption Advisories and land use restrictions are short term risk management tools, they should not be relied on long-term.

CNSC Questions and Comments



Closing Comments By An ACFN Elder

