



**Written submission from the
Métis Nation - Saskatchewan**

**Mémoire de la Nation métisse
de la Saskatchewan**

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

MÉTIS NATION - SASKATCHEWAN

CNSC – Cameco, Beaverlodge

What We Heard Report

December 2024

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Purpose

The following “What We Heard” Report presents information gathered by the Consultation unit within the Métis Nation – Saskatchewan (MN-S) Ministry of Lands and Environment pertaining to ongoing impacts to Métis rights and traditional use of the Métis homeland in Uranium City and the surrounding area. This report considers the impacts of a proposal for the Canadian Nuclear Safety Commission to relieve the Cameco Corporation (Cameco) of its environmental responsibilities and Aboriginal rights liabilities by transferring the remaining 27 Cameco Beaverlodge properties to the Province of Saskatchewan’s Institutional Control Program (ICP). The proposal to transfer lands from Cameco to the ICP is generally supported by the information in this report, but concerns were raised over the ongoing responsibilities and fulfillment of duties by both the Government of Saskatchewan and CNSC as they pertain to the maintenance and monitoring of the site. Developing transparency between affected communities and the CNSC is essential, and this report represents this commitment to transparency between MN-S, its citizens, and the CNSC. The objective of this report is to advance conversations and identify areas of concern regarding the transfer of Cameco Properties to the Province of Saskatchewan’s IPC.

i) Duty to Consult Notification

At the request of CNSC, as communicated in the Duty to Consult (DTC) notification regarding the proposal, MN-S has fostered conversations with Métis communities in Uranium City and the surrounding Métis homelands to collect and document Métis concerns pertaining to the proposed transfer of responsibility for the 27 permitted Beaverlodge properties. The proposal has requested that CNSC release the 27 properties from the licensing requirements of the *Nuclear Safety and Control Act (NSCA)* and transfer the maintenance and monitoring of those properties to the ICP. The CNSC has exempted the Province of Saskatchewan from licensing the properties and has authorized the approval of the sites to be transferred to the ICP.

On February 27, 2024, Métis Nation – Saskatchewan President Glen McCallum received a DTC notification regarding the Beaverlodge transfer proposal from the CNSC Directorate of Nuclear Cycle and Facilities Regulation, Uranium Mills and Mines Division. The notification was also received by the Director of MN-S’ Ministry of Lands and Environment. The notification outlines Cameco’s request for the CNSC to revoke the 27 licenses, allowing for the Beaverlodge properties to be transferred to the ICP, and requests the MN-S to consider how the transfer may affect Aboriginal rights and traditional land use in the area.

The DTC notification specifically named the following Métis Locals and Presidents as being included in the scope of the notification.

→ Métis Local #50, Uranium City President Allan Auger.

→ Métis Local #80, Stony Rapids President Curtis Fiss

→ Métis Nation - Saskatchewan

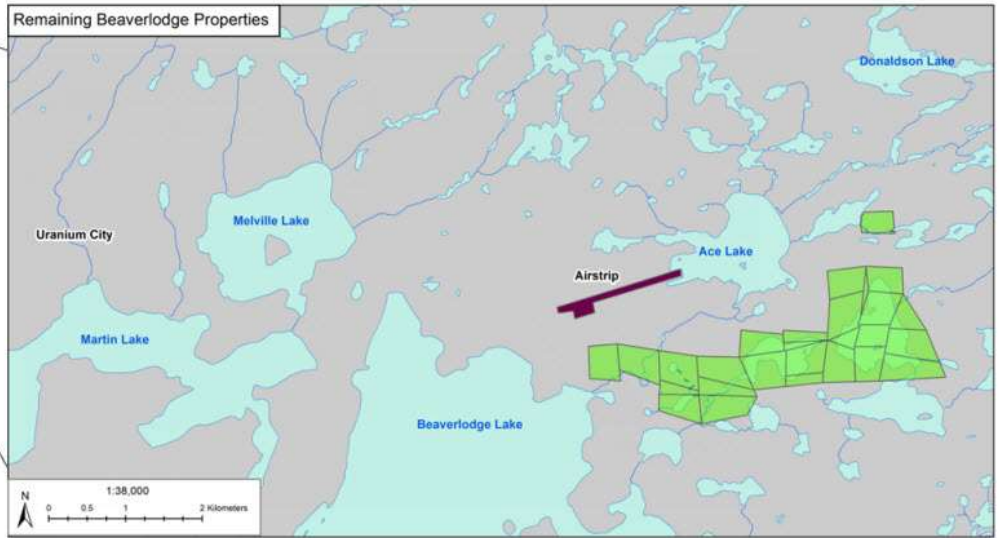
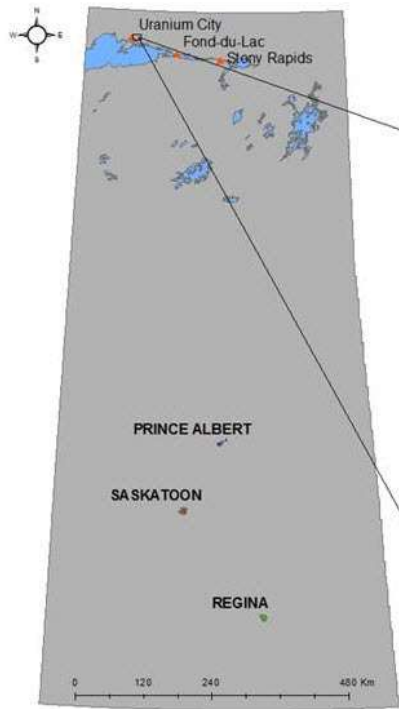
ii) Brief Timeline of Events

- February 5, 2024 – Cameco makes the application to the CNSC for the revocation of the 27 decommissioned Beaverlodge property licenses.
- February 27, 2024 – MN-S President McCallum receives notification from the CNSC requesting consultation on the Cameco’s application to revoke the licenses for the remaining 27 Beaverlodge properties.
- September 23, 2024 - MN-S conducts a consultation meeting and site tour with Uranium City Métis Local #50 and interested community members.
- January 29 or 30, 2025 – CNSC schedules the hearing for the license revocation in Saskatoon, SK.
- May 31, 2025 – The date on which Cameco’s amended license for Beaverlodge properties are set to expire.

Overview

i) Location of Beaverlodge Site

Uranium City is one of Saskatchewan’s most northern settlements, located off Lake Athabasca on the northern shore of Cinch Bay and Martin Lake. The Beaverlodge site is located near Uranium City and Lake Athabasca. It was established within the historic Homeland of the Métis and overlaps the traditional territories of the Dene and Cree.



ii) History of Beaverlodge Property

The Athabasca basin was historically a vibrant area of Métis activity. Métis people accessed Lake Athabasca via the Churchill River system, accessing the Clearwater River system from the Methye Potage at Lac La Loche, which then provided entry into the Athabasca River and Lake Athabasca proper, before flowing into the Slave and Peace rivers. The Portage La Loche Brigade started in 1826, travelling as an organized group from the Red River to Methye Lake each year, binding the Red River Métis of present-day Manitoba with the Athabasca basin. Prior to the development of Uranium City, the Métis were part of a thriving traditional community of trappers and commercial fishers, who lived a traditional Métis life based on the provisions of the land. As the resource industry developed Uranium City, the economic opportunities attracted Métis people from throughout the basin. The population of Uranium City expanded to almost 3,000 in 1981, with infrastructure to support 5,000 residents. The closure of mines led to the economic collapse of Uranium City, and much of the population followed the skilled jobs south. By 1986, Uranium City's population decreased to 200 people, and by 2001, according to the Canadian Census, only 91 remained. Post-Uranium City economic collapse, Métis did not return to the land in the manner they were raised. They were now a skilled, educated work force that was accustomed to western society's economic way of life.



“The greatest and most important of the brigades organized at Red River Settlement is that commonly known as the Portage La Loche Brigade... Their new route runs in a westerly direction across Lake Winnipeg, up the River Saskatchewan, and northwards past Forts Cumberland and Isle A la Crosse, to Methye Portage, called also Portage La Loche, referred to by me in a previous chapter as the Height of Land separating the waters flowing into the Arctic Sea from those draining into Hudson's Bay.

This is the extreme limit of the course traversed by "the Portage Brigade." Here it is met by brigades travelling south from Mackenzie River and bringing the furs already traded.”

- James Hargrave. Red River. Montreal: J. Lovell 1871

In the early 1930s, prospectors discovered deposits of uranium minerals in the Beaverlodge region. The Beaverlodge site was discovered in 1949 by S. Kaiman while researching radioactive materials around Lake Athabasca. In 1952, the government established a town to service the mines developed by Eldorado Mining and Refining Limited (Eldorado Ltd.), a federal Crown corporation. Eldorado Ltd. commenced uranium mining and milling operations at the Beaverlodge Project site in 1952 and was abruptly shut down in 1982. The site was decommissioned and reclaimed from 1982 to 1985 with standards approved by federal and provincial regulators.

Eldorado Ltd. amalgamated with Saskatchewan Mining Development Corporation in 1988 to form the Cameco Corporation (Cameco). Cameco assumed the responsibilities of the properties at the site. The Beaverlodge site consists of 70 distinct properties. Since 1985, Cameco has continued to monitor and maintain a number of these properties on behalf of the Government of Canada. Cameco has conducted work, warranting the site to be transferred to the Government of Saskatchewan Institutional Control Program (ICP). In 2009, the process to transfer the decommissioned Beaverlodge properties to the Province of Saskatchewan ICP was initiated. The ICP ensures that the properties in the program will be monitored and managed in perpetuity.

Since 2009, 24 of the 70 Beaverlodge properties were removed from the CNSC license and transferred to the ICP. One property was found to have no associated risks and did not require institutional control measures and was therefore free released. CNSC is set to make an upcoming decision regarding Cameco's application for the release of an additional 18 properties to ICP, leaving 27 properties under the CNSC-issued license.

iii) Northern Saskatchewan Uranium

Northern Saskatchewan holds nearly all of Canada's uranium reserves. In 2018, Canada was the world's second largest producer of uranium. Canada has the world's largest deposits of high-grade uranium with grades of up to 20% uranium, which is 100 times greater than the world average. In 2018, Canada produced 6,996 Tonnes of uranium (all sourced from mines in Northern Saskatchewan), valued at approximately \$800 million.

iv) Background Of Consultation Grant

CNSC tendered the Duty to Consult for Cameco's Beaverlodge site in February 2024. CNSC sought qualified applicants to ensure meaningful engagement with local Métis communities. MN-S Lands and Consultation Manager Andrew Spriggs applied for this tender, demonstrating a strong commitment to representing Métis interests and ensuring that community voices are heard in the consultation process. After reviewing the application, CNSC awarded the tender to MN-S recognizing their expertise and dedication to fostering respectful and effective consultations with Métis communities. This decision shows the importance of Métis-led participation in environmental and regulatory processes, particularly in areas with significant historical and cultural ties to the Métis Nation.

Participant Funding

Participant funding was granted for the review of the CNSC's documentation, the review of Cameco's license revocation documentation, and for participation in the Commission's hearings. The CNSC offered participant funding to assist Indigenous Nations and communities, and interested members of the public. This outcome was achieved by MN-S providing written and oral interventions to the CNSC. The participant funding is to support an informed topic-specified intervention that advances conversations about Cameco's application to CNSC.

The CNSC has scheduled a public hearing for January 29, 2025, to examine Cameco's application for the release of the last of the decommissioned Beaverlodge mine and mill site properties from CNSC licensing and to transfer those properties to Saskatchewan's ICP. This will result in the revocation of Cameco's waste facility operating license for the decommissioned Beaverlodge mine and mill site.

Participants

"Métis" is defined as "a person who self-identifies as Métis, is distinct from other Aboriginal peoples, is of historic Métis Nation Ancestry and who is accepted by the Métis Nation." This is the National Definition of Métis Citizenship from Métis National Council General Assembly, 2002. Métis are a unique and distinct rights-bearing Aboriginal people, whose rights are recognized and affirmed in Section 35 of the Canadian Constitution. The Métis are recognized in the *Constitution Act, 1982* "Section 35 (1) the existing Treaty and Aboriginal Rights of the Aboriginal peoples of Canada are hereby recognized and affirmed;" (2) In this Act, "Aboriginal peoples of Canada" includes Indian, Inuit and Métis peoples." The Métis are additionally recognized within Canada's current distinctions-based approach to relationships with Indigenous peoples.

Métis Nation–Saskatchewan (MN-S) is a government and has been recognized as such by the Federal Government in *The Métis Government Recognition and Self-Government Agreement (2019)*. The MN-S represents the political, socioeconomic, cultural, and educational interests of more than 80,000 Métis citizens in Saskatchewan through a representative system comprised of 12 Regions and approximately 96 active Locals. The MN-S’ expectations for engagement and consultation are based in recognition of its Section 35 rights under the Constitution, its status as a recognized Indigenous government, and as an Indigenous Nation that is distinct from other Indigenous groups in Saskatchewan.

The participants included Uranium City Métis Local President Allen Auger, La Ronge Métis Local President Brett Angus, local Métis residents, and several concerned citizens who live in the vicinity of the Beaverlodge site. MN-S was represented by Ministry of Environment and Lands Director Brent Laroque; Lands and Consultations Manager Andrew Spriggs; Traditional Land Use Specialist Hughie Hill; and Duty to Consult Liaison Brandy Engele. CNSC representatives joined the consultation engagement virtually to present a slide show and address questions from the community.



Outcome

i) Consultation Methodology

MN-S undertook a community-led approach to this consultation. Several meetings were had with Uranium City Métis Local President Allen Augier; Stony Rapids Local President Curtis Fiss; and La Ronge Métis Local President Brett Angus. The presidents consulted with their Local members and a decision was made for MN-S to host an in-person consultation meeting in Uranium City. CNSC was invited to present, but Cameco was not invited, as Cameco was in the community recently to

engage with the Uranium City Métis Local on the Beaverlodge properties. CNSC was unable to attend in-person and arrangements were made to facilitate virtual attendance of CNSC staff.

The consultation meeting was held in Uranium City on September 24th, 2024, from 1:00– 3:00 p.m. and was immediately followed up with a site tour led by the Uranium City Local President and several Uranium City citizens.

ii) Participant Discussion

Métis Nation – Saskatchewan rights-holding citizens attended the meeting along with other concerned community members. Participants asked questions, identified concerns, and made comments during the CNSC presentation, including:

1. There are three building structures that need to be removed: the collapsed firehall (not CNSC), Fishhook Bay Lodge (which may be privately owned), and a former trucking company structure that is still standing at the former Eldorado Ltd. site. The community was instructed to ask George Bahoone (Government of Saskatchewan) who the three buildings belong to, and Environment and Lands Director Brent Laroque has offered to look up the titles.



2. There are also collapsing buildings, including a school, apartment buildings, and homes on properties previously owned by Eldorado Ltd. These structures should be cleaned up. The issue of responsibility was raised by meeting participants. It was expressed that this responsibility should not fall on the municipality. If the Uranium City municipal government

is found responsible for the cleanup, meeting attendees offered that funding should be provided by the Province to help remove the structures.



3. There are many 3x45-gallon drums of what were previously thought to contain Polychlorinated Bisphenols (PCB's) from a decommissioned transformer formerly located on the Eldorado Ltd. site. A sample was taken and sent to the Saskatchewan Research Council (SRC). Results came back that the substance in the drums is hydraulic fluid. Citizens are concerned about this fluid seeping into the ground. The leaking barrels were reported to the Government of Saskatchewan Spill Reporting Centre on October 24, 2024.



4. There are large quantities of barrels on the properties surrounding the airport. The barrels depicted in the pictures below are on properties formerly owned by Eldorado. The barrels

are thought to have contained aviation fuel, and several have undetermined liquids stored in them that are starting to leak. One particular barrel is labelled “Property of Saskatchewan Environment.” The Métis community has been trying to communicate with the Province to have the barrels removed and the area decontaminated, however, no meaningful conversation has taken place and the issue continues to be an environmental concern for the Métis community.



5. A question arose about how many residents use wood stoves and clean ash out of fireboxes. It was asked if testing for uranium and selenium was conducted on the ash produced by wood heating. Participants sought clarity on the appropriate level of concern residents should have at the prospect of being exposed to airborne contaminants. It was unclear if ash is being tested for contaminants as no participants at the meeting had knowledge of this type of testing being conducted at the site.
6. It was asked if it was possible for contaminants to be absorbed by trees and vegetation. Participants sought guidance on whether foraging should be done in areas they suspect may have been contaminated. CNSC stated that it had done testing on the plants, including samples of several types of indigenous foods. However, CNSC representatives recalled that there was not a lot of vegetation when they sampled the Beaverlodge properties, as the area is rocky and inhospitable to plant life. The levels of uranium and selenium uptake in the site’s vegetation were said to be exceptionally low.
7. Participants inquired as to whether water quality standards are being met. Concerns were raised regarding uranium in the water supply and doubts as to whether uranium could be

measured once it entered the water. One participant stated that, once uranium soaks into water, the water acts like masking tape, concealing the issue. Years ago, it was determined that there was no contamination. There needs to be long-term monitoring and maintenance to ensure that contamination is not present. It was also raised that the provincial and federal standards may not be the same, and that analysis of samples should be handled by the level of government with the most stringent standards for that type of analysis.

8. Participants stated that Beaverlodge Lake will need continued fish monitoring by the Province. The meeting participants highlighted that Martin Lake has elevated selenium, therefore limiting consumption. It was stated that Saskatchewan Health Authority (SHA) decides the amount of safe fish consumption through the healthy fish consumption guideline. Meeting participants voiced that consideration must be taken for monitoring fish for contaminants as the Beaverlodge, Laredo, and Gunner sites all flow into Beaverlodge Lake. Participants felt that the state of Beaverlodge Lake must continuously be monitored for contaminants in the water and fish.
9. CNSC will only revoke the license when they feel the environment is satisfactory and safe for use of local citizens. Concerns were raised over what qualifies as satisfactory and safe. The concern is that after the transfer, the licensee will not provide the necessary funds for site reclamation, leading to the abandonment of the sites by both the Province and corporations.
10. Participants inquired as to what would happen to the industrial byproducts, derelict machinery and buildings that were left on “Our Métis Homeland” if the transfer is approved by the CNSC. Participants decried the debris left behind as ‘eyesores’ that affect economic opportunities like tourism. It was expressed that many people travel to the north for its pure, raw beauty and fall in love with the place; and local citizens live and gather there as well. Participants expressed that both tourists and locals would prefer it if the debris and waste were cleaned up as it would improve the aesthetic value of the community. Some felt that visitors marvel at the beauty of the area until they see the aftermath of the industrialization of Uranium City. Others expressed that the jobs and economic security once offered by the mines have been replaced by a growing tourism industry, which represents one of the only viable economic opportunities that remains for the area. It was expressed that the visibly polluted and neglected areas harm this emerging industry. Participants felt strongly that the community relies on tourism as one of the only

remaining viable economies, and that it should not be the community's responsibility to clean up the remnant scrap left by industry. It was stated that proving some of the industrial byproducts are tied to Eldorado Ltd. would be difficult, but others are obviously branded with the defunct corporation's logo.





Conclusion

As the 27 properties discussed in this report are the last remaining properties of the Eldorado mine, the Métis community feels that this consultation is the last opportunity to have a meaningful discussion with a regulator that could aid in the removal of mining remnants (buildings, equipment, scrap metal, industrial HVAC parts) and the decontamination of the properties previously owned by Eldorado Ltd. (the properties are currently owned by Cameco).

MN-S believes the Federal Government (which includes CNSC) and the Province of Saskatchewan both have a fiduciary responsibility to ensure the impacts of industry, not only to the environment but also to those that inhabit and utilize the environment, are mitigated. Métis Aboriginal rights are protected under section 35 of the *Constitution Act, 1982*. These rights include Aboriginal Title to the Land, and Métis have never ceded their land to the Federal Crown or the Province of Saskatchewan. As a result, Métis land title has never been extinguished. We remain adamant in ensuring we hold those accountable for the disruption to our Métis rights and lands.

Our Aboriginal right to subsistence resources has been trampled on by the industrialization of Northern Saskatchewan. Commercial fishing was an economic driver of the Uranium City area, pre-industrialization. Post-decommissioning of the Beaverlodge properties, we are left with contaminated lakes, health limitations placed on fish consumption, and a public stigma of radiation pollution. If you go to the only store in Uranium City, you can buy t-shirts and souvenirs with a skull and crossbones labelled “Uranium City, Saskatchewan.” Considering the Supreme Court of Canada “Marshall decision,” how can Métis be expected to be able to exercise their right to hunt, fish and gather for a moderate livelihood? Who would buy their saleable products knowing the level of environmental contamination that remains from industry?

As Métis, our way of life was based on the land we inhabited. The Métis of Uranium City were hunters (Caribou, Moose, Grouse, etc.), trappers (Martin, mink, rabbits, beaver, lynx, etc.), fishermen (both commercial and sustenance) and gatherers (berries, medicinal plants, firewood, etc.). The long-term effects of environmental contamination impact our cultural practices and significantly reduce the availability of traditional lands, which are essential for passing on teachings and knowledge to younger generations. These teachings include the importance and use of traditional lands.

Respect for the environment, leaving the land as you found it: modern Métis teachings have coined this as “Pack it in Pack it out” or “leave no trace.” This is all the Métis community is asking for, respect. Laredo (Cameco) brought industrialization to Uranium City, the community is grateful

for this, the Métis Elders talk fondly of the careers and friendships the Laredo mine provided. The mine is gone and so are the jobs, what remains is an eyesore; respecting our culture and our land would involve the return of our land to pre-industrial conditions.