CMD 25-H3.3A

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#### Supplementary Information

#### Presentation from the Ya'thi Néné Lands and Resources Office

#### **Renseignements supplémentaires**

Présentation du Bureau des terres et des ressources de Ya'thi Néné

In the Matter of the

À l'égard de

#### **Cameco Corporation, Beaverlodge Project**

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

#### Cameco Corporation, le projet de Beaverlodge

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



# Ya'thi Néné Lands and Resources

Presentation to Canadian Nuclear Safety Commission

Beaverlodge Project: Cameco's request to revoke their licence and transfer remaining 27 properties to the Institutional Control Program

30 January 2025





## Ya'thi Néné Lands and Resources (YNLR)

#### Mission:

To protect the lands and waters of the Athabasca Basin for the longterm benefit of its Denesuline First Nations and Athabasca communities

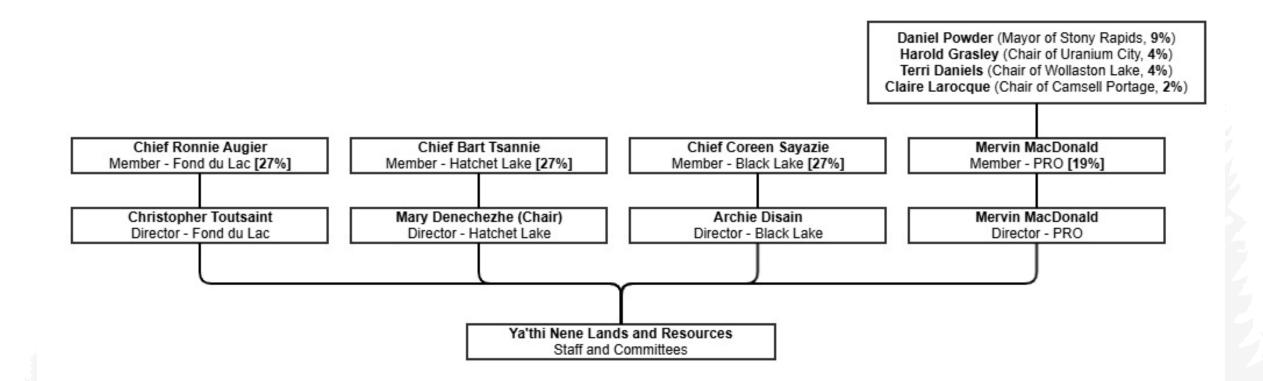
# Nuhenéné (Traditional Territory)





## Governance

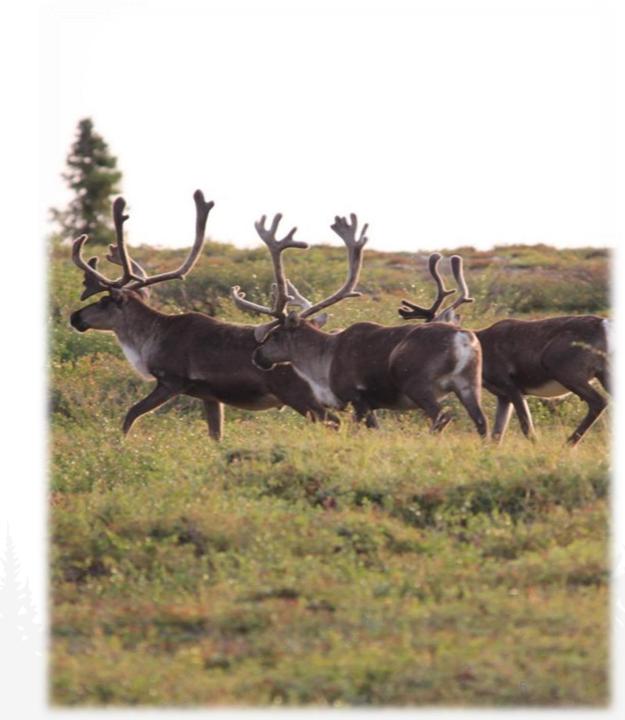


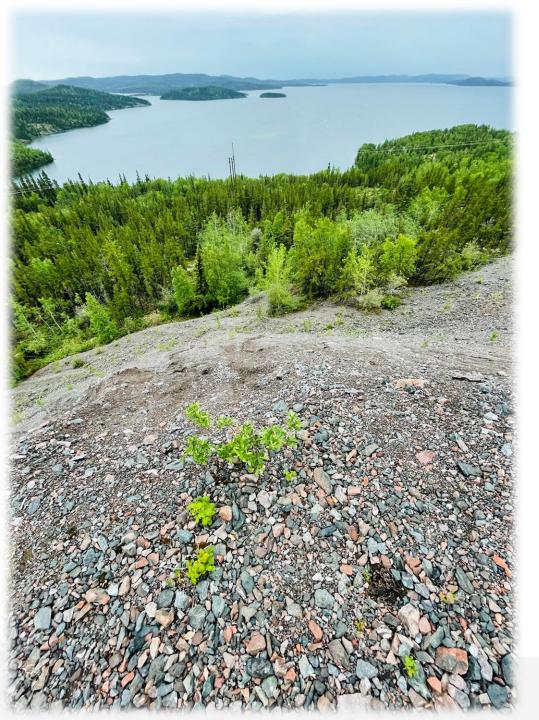


#### Ya'thi Néné Lands and Resources is Indigenous owned and community led

# Ya'thi Néné's Role

- Prior to YNLR, Athabasca communities were largely uninformed about exploration and mining projects and received little benefits
- Damage to lands and waters occurred
- Now, YNLR liaises between communities, industry, and government on projects of mutual interest and has formal agreements with multiple exploration and mining companies
- To strengthen the relationship and support the discussion of issues or concerns, YNLR and CNSC established a Terms of Reference in 2022





#### **Beaverlodge: The Issue**



Operational 1952-1982, left a legacy of environmental and cultural damage

Rights-holders of Treaties 8 and 10 rely on this area for traditional uses, as do other YNLR members

BUT, many lakes subject to advisories, limitations, and moratoriums on fish and water consumption

All but 27 of the original 70 properties have been released from CNSC licensing and transferred to Saskatchewan' Institutional Control Program (ICP)

The proposed final release of the remaining properties is an important issue for Athabasca Basin communities

# **Thoughts from Leadership**





# **Thoughts from an Elder**

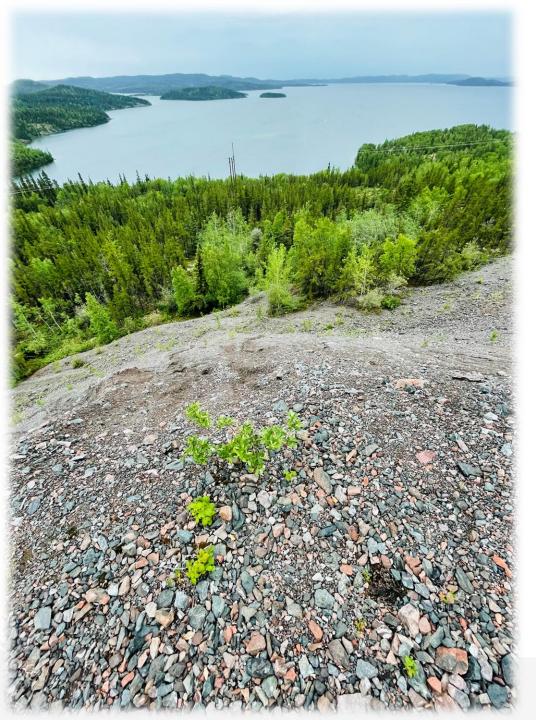




# **Thoughts from Youth**







### **History of Past Interventions**



**2019:** Release of 20 properties to Institutional Control Program (ICP): APPROVED

• YNLR did not oppose but made other requests

2022: Release of 18 properties to ICP: APPROVED

• YNLR opposed and made other requests

2023: 2-year license extension: APPROVED

• YNLR did not oppose but made other requests

#### Many of YNLR's requests have not been addressed to date

### **Cameco's Long-term Monitoring Plan (LTMP)**





**Purpose:** LTMP provides guidance for monitoring properties and downstream areas once transferred to ICP to ensure management is adequate

- Cameco asked for community input through meetings
- Will be implemented by Ministry of Energy and Resources at their discretion once properties are in ICP

YNLR submitted written comments to Cameco about LTMP

- YNLR and Cameco met to discuss
- Cameco responded in writing but did not revise LTMP

#### Issues:

- 1. No plan for how communities will be involved, engaged, or informed once properties are transferred
- 2. Lack of background information and technical details



### Previously Unresolved: Cumulative Effects



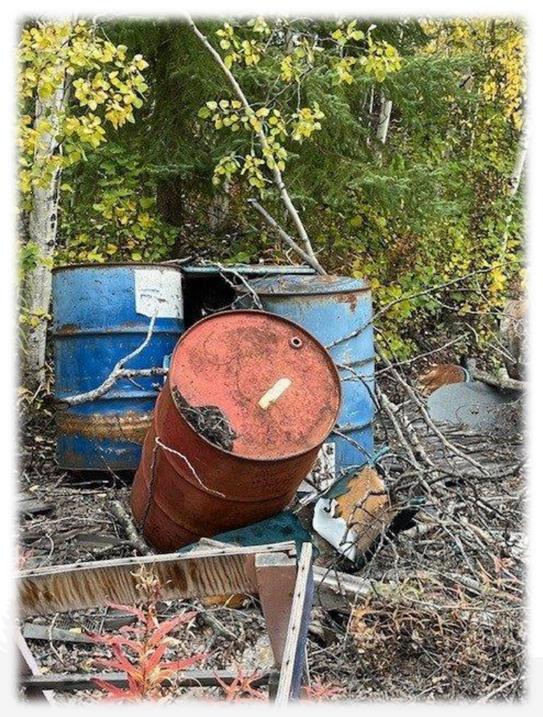
YNLR asked for cumulative effects study in two prior interventions

Lack of consideration of cumulative effects: loss of use for traditional land users and contributed to alienation from a landscape that is not safe

Alberta Court of Appeal: "the extinguishment of the [Treaty] right will be brought about through the cumulative effects of numerous developments over time"

In earlier decisions, the Commission's response to impact to Treaty 8 and 10 rights has been 'not now'

As the Commission considers the final transfer of the Beaverlodge properties, <u>that time is now</u> <sup>12</sup>



### Previously Unresolved: Safe, Secure, Stable, and Improving



YNLR understands the use of these terms as technical indicators

CNSC has been working to eliminate use of these terms in their ROR presentations and YNLR appreciates these efforts

Use of these terms causes confusion and mistrust of industry and regulators from the viewpoint of Basin residents

- Any limitation of traditional foods is not an indication of safe
- Traditional versus recreational use

### **Previously Unresolved: Engagement Through ICP**



YNLR is deeply concerned about communications with MER through the ICP

Some ICP inspection results are available online but have not been meaningfully communicated to Basin communities

• In particular, Fond du Lac has not been engaged

YNLR's letter to MER dated August 2023 with concerns about ICP has remained unanswered

YNLR believes that the ICP is not aligned with Basin communities' interests and so transfer of these properties should be **denied** by the Commission



# **Closing Remarks**

YNLR has submitted three prior interventions concerning Beaverlodge; many concerns have not been addressed

YNLR and the Athabasca Basin communities strongly oppose revocation of Cameco's license and transfer of the remaining 27 properties to Saskatchewan's ICP

Until our concerns are addressed, the Beaverlodge Project should remain under federal oversight of the CNSC

## Marsi chogh!



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