



Oral presentation

Exposé oral

**Written submission from
Canada North Environmental
Services (CanNorth)**

**Mémoire de
Canada North Environmental
Services (CanNorth)**

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



CanNorth

Canada North Environmental Services Limited Partnership

A First Nation Environmental Services Company

December 9th, 2024

Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
280 Slater St.
PO Box 1046 Stn B
Ottawa ON K1P 5S9
Email: interventions@cnsccsn.gc.ca

RE: Intervention letter on the application for the release of the final set of decommissioned Beaverlodge mine and mill site properties from the Canadian Nuclear Safety Commission (CNSC) licensing for acceptance into Saskatchewan's Institutional Control (IC) Program

To whom it may concern,

Thank you for the opportunity to submit this intervention letter on behalf of Canada North Environmental Services (CanNorth). We are also requesting the opportunity to provide an oral presentation to the Commission at the public hearing being held on January 30th, 2025.

CanNorth is a 100% Indigenous-owned firm that has been providing a wide range of environmental consulting services to industry, government agencies, First Nations, and other client types for over 35 years. Our office locations include Saskatoon, Saskatchewan, La Ronge, Saskatchewan, and Markham, Ontario.

Since 2001, the Lac La Ronge Indian Band (LLRIB) has been the sole owner of CanNorth; thus, in addition to directly providing employment opportunities, our profits also benefit Indigenous people. As an Indigenous-owned company, our corporate objectives include maximizing Indigenous involvement by providing employment, training, engagement, and knowledge gathering opportunities. One of our specialty services is facilitating communication and trust building between stakeholders/rights-holders and developments. CanNorth is a Certified Aboriginal Business through the Canadian Council for Aboriginal Business.

CanNorth manages several long-term community-based environmental monitoring programs and traditional foods studies that are conducted in the Athabasca region of northern Saskatchewan. This includes the Eastern Athabasca Regional Monitoring Program (EARMP; 2011-ongoing) and the Community-Based Environmental Monitoring Program (CBEMP; 2018-ongoing). The continued support of Cameco in these monitoring programs has resulted in a long-term data set from the Uranium City area where the decommissioned Beaverlodge properties are located.

Additionally, CanNorth assisted Cameco Corporation (Cameco) by completing a technical evaluation and workshop facilitation that informed the Beaverlodge Long-Term Monitoring Program (LTMP). The LTMP will be implemented at the discretion of Saskatchewan Ministry of Energy and Resources once all the decommissioned Beaverlodge properties have been accepted



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into Saskatchewan's IC Program. The program design was informed by inputs from the technical evaluation, engagement activities, as well as the goals of the IC Program.

An overview of the EARMP, the CBEMP, and CanNorth's support for the Beaverlodge LTMP development is provided below.

EARMP

The EARMP was established in 2011 under the Province of Saskatchewan's Boreal Watershed Initiative. The program is a government-industry partnership and is supported by contributions from several stakeholders including the Saskatchewan Ministry of Environment, the CNSC, Cameco, and Orano Canada Inc. (Orano).

One of the primary objectives of the EARMP is to monitor potential cumulative effects to environments located downstream of mining and milling operations in the Athabasca region. This is done by comparing data to baseline conditions and examining the data, both spatially and temporally, for changes over the long-term. The community program was developed to address potential concerns about the safety of traditionally harvested foods that community members routinely consume by collecting and testing water, fish, berry, mammal, and bird tissue samples in partnership with community members.

The EARMP community program objectives are to:

- Determine the safety of traditionally harvested food for local consumption.
- Establish long-term monitoring at community harvesting areas to assess any changes over time.
- Foster confidence in the consumption of traditional foods and engage and involve community members in the gathering of information.
- Communicate monitoring results to community members and other stakeholders.

A key objective of the EARMP is to provide the public full access to all data and reports online at www.earmp.ca.

The study areas for the EARMP are situated near the seven communities in the Athabasca region, which includes Uranium City. The program relies on the participation of community members for the selection of sampling locations and for sample collection. The selected representatives from each community have been provided training in sample collection, storage, and shipping procedures for the EARMP community sampling program. Yearly, the community members determine the locations for sampling fish, berries, mammal, and birds and focus on areas where community members routinely fish, hunt, and gather. Results the EARMP have shown that water and traditionally harvested foods are safe to consume, and community members can continue to enjoy traditional foods.

With support from the funding partners, the success of this program has stemmed from involving and engaging the community from the start, with a focus on developing sampling objectives driven by the community. The EARMP contains a consistent core program that has been prioritized for funding over the long term as well as a component that is adaptable to addressing community concerns. Community members can submit samples outside of the core program and over the years, this has included the submission of more than 70 additional samples for chemical analyses. This has allowed the program to address additional community concerns while also maintaining consistency with the core program.



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It is important that the data are put into meaningful context and communicated to community members. The EARMP has done this through the development of a regional reference range, the use of guidelines, and the completion of Human Health Risk Assessments (HHRA) that have confirmed traditional foods are safe to consume. Program results are shared each year with communities in a clear language report. A 10-year summary booklet was also released in early 2023, which included an overview of EARMP results.

In summary, since the EARMP community monitoring program began, over 1,000 samples have been collected and results have continued to show that community traditional foods are a safe and healthy dietary choice for residents of the Athabasca Basin.

CBEMP

In 1999, the Athabasca Working Group (AWG) environmental monitoring program (EMP) was formed as a community-based program, which was a first-of-its-kind initiative within the uranium industry. Community sampling took place through the AWG EMP for 18 years (2000 to 2017), and currently it continues as the CBEMP.

In 2016, the Athabasca communities, Cameco, and Orano signed the Ya'thi Néné Collaboration Agreement building upon the enduring partnership in the development of uranium resources in the Athabasca Basin. The agreement established the Athabasca Joint Engagement and Environment Sub-committee (AJES) responsible for reviewing and receiving information in relation to the environment and monitoring programs related to the mining operations. The AJES also ensures the Athabasca Basin communities and residents are properly informed and that community concerns are shared with the relevant mining companies.

Within the new agreement, a commitment was made to continue and improve the existing AWG EMP. From 2017 to 2018, the AJES completed a review of the EMP, and decided to enhance the EMP by implementing a focused monitoring program that would collect data on traditional food consumption patterns for the communities and broaden the understanding of the health status of those foods by collecting samples from harvesting locations. The newly established CBEMP focuses on a separate community (or groups of communities) each year, allowing for a more targeted traditional foods study consisting of both an interview and sampling program. The program enables community members to become more involved and provide input to steer the program in their community.

The CBEMP started in 2018 with the communities of Black Lake and Stony Rapids, followed by Fond du Lac Denesūłiné First Nation, the northern settlement of Wollaston Post and Hatchet Lake Denesūłiné First Nation, and Uranium City and Camsell Portage. In 2023, a HHRA was completed using the data collected from each community study. The HHRA integrated the community-specific information on the amount of traditional food that people eat and the levels of chemicals in the traditional food collected through the CBEMP monitoring programs to determine exposures and potential risks from eating traditional food and drinking water within each of the seven communities. The results of the risk assessment for all communities in the Athabasca region indicated that the risks are negligible for people who eat a typical or high amount of traditional food. With the completion of the HHRA, the first cycle of the CBEMP was completed.

This long-term community-based program is ongoing and the second cycle of the CBEMP started in fall 2023. The second cycle of the CBEMP will revisit all the communities which will allow the program to look at changes in traditional food consumption over time. The communities will be revisited in the same order as the first cycle, starting with Black Lake Denesūłiné First Nation and



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the northern hamlet of Stony Rapids. The second round of sampling in Fond du Lac Denesūłiné First Nation was initiated in the fall of 2024.

Since the start of the program, over 280 traditional food samples have been collected and tested. Sample results have consistently shown that the foods harvested by community members are safe for consumption.

Beaverlodge LTMP

Cameco's goal of managing the decommissioned Beaverlodge properties was to ensure the properties and areas downstream of the properties are meeting the objectives of being physically and radiologically safe, secure, and stable. As all physical remediation activities related to the Beaverlodge properties have been completed, the objective of the Beaverlodge LTMP is to monitor ongoing natural recovery of the environment over the long-term within the IC Program.

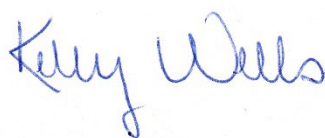
Multiple objectives and perspectives were incorporated in developing the Beaverlodge LTMP. CanNorth subject matter experts were involved in completing the technical evaluation, which built off over 40 years of environmental monitoring and site characterization activities and considered how monitoring can evaluate long-term trends while supporting the Saskatchewan Health Authority in managing the Healthy Fish Consumption Guideline. CanNorth's subject matter experts have been working on projects related to the Beaverlodge properties and in the Uranium City area for over 20 years and are experts in water quality trend analyses and predictive modelling, risk assessment, and environmental monitoring.

The technical evaluation formed one component of the draft LTMP, which Cameco then presented to community members and other interested parties to incorporate more perspectives and feedback prior to developing the final monitoring program. CanNorth assisted Cameco by facilitating an in-person workshop held in June 2023 that was attended by rights holders, regulatory agencies, and northern community stakeholders. The primary purpose of the workshop was to obtain input from workshop participants on long-term environmental monitoring once the Beaverlodge properties are transferred to the IC Program.

Closing

I trust that this letter provides sufficient background on the EARMP, the CBEMP, and development of the Beaverlodge LTMP. These programs illustrate Cameco's commitment to ensuring the success of community-based monitoring programs and recovery of the environment at the decommissioned Beaverlodge properties over the long-term.

Sincerely,



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Environment Division Manager

Canada North Environmental Services



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