

CMD 25-M4.6

Date: 2024-12-10 File / dossier : 6.02.04 e-Doc PDF: 7425111

Written submission from the **Athabasca Joint Environmental Subcommittee (AJES)**

Mémoire de l'Athabasca Joint **Environmental Subcommittee** (AJES)

Regulatory Oversight Report for Uranium Mines, Mills, Historic and **Decommissioned Sites in Canada: 2023**

Rapport de surveillance réglementaire des mines et usines de concentration d'uranium et des sites historiques et déclassés au Canada: 2023

Commission Meeting

Réunion de la Commission

January 29, 2025

29 janvier 2025



Written Submission from Athabasca Joint Environmental Subcommittee (AJES) In the matter of:

Regulatory Oversight Report for Uranium Mines, Mills, Historic and Decommissioned Sites in Canada: 2023

Canadian Nuclear Safety Commission (CNSC)

Introduction

The Regulatory Oversight Report (ROR) is completed annually and presented by the Canadian Nuclear Safety Commission (CNSC). The document reports on the operating performance of uranium mines and mills licensees and licensed facilities, license changes, and major developments, and describes CNSC's regulatory efforts and engagement. The 2023 report also included information on historic and decommissioned sites.

The currently active facilities included in the 2023 ROR are Cameco Corporation's operations at Cigar Lake, McArthur River, Rabbit Lake, and Key Lake, and Orano Canada's operation at McClean Lake. Cigar Lake, McArthur River, Key Lake, and McLean Lake operated throughout 2023, and Rabbit Lake remained in a state of care-and-maintenance in 2023. Historic and decommissioned sites in Saskatchewan, Ontario, and Northwest Territories for the period of 2021 through 2023 are also described in the 2023 ROR. Of interest to the Athabasca Joint Environmental Subcommittee (AJES) are decommissioned properties of Beaverlodge, and Cluff Lake.

Athabasca Joint Environmental Subcommittee (AJES)

The seven Athabasca Basin communities (Denesyliné First Nations of Black Lake, Fond du Lac, and Hatchet Lake and municipalities of Stony Rapids, Wollaston Lake Post, Uranium City, and Camsell Portage) signed the Ya'thi Néné Collaboration Agreement in 2016 with Cameco and Orano. The Agreement confirms the partnership between the communities and industry in development of uranium resources in the Athabasca Basin relative to the existing operations. The Agreement also builds on an impact management agreement signed in 1999 and is structured on the five pillars of workforce development, business development, community investment, environmental stewardship, and community engagement.

The Ya'thi Néné Lands and Resources Office (YNLR) works to protect the lands and waters of the Athabasca Basin for the long-term benefits of its Denesyliné First Nations and Athabasca communities, guided by their knowledge, traditions, and ambitions. YNLR is 100% owned by Athabasca Basin communities and governed by an independent Board of Directors appointed by elected community leaders. In addition to many land- and resource-related initiatives, YNLR supports the implementation of the Collaboration Agreement and provides support to the AJES under the community engagement and environmental stewardship pillars.

Under the Collaboration Agreement, AJES was created and appointed as the primary liaison between Cameco, Orano, and the Athabasca Denesyliné First Nations and Athabasca communities for the sharing of environmental information. AJES members include one representative from each of the First Nations (Black Lake, Hatchet Lake, and Fond du Lac), one representative that represents the municipalities (Camsell Portage, Uranium City, Stony Rapids, and Wollaston Lake Post), one representative each from Cameco, Orano, and YNLR.

The AJES serves as the first point of contact between communities, Cameco, and Orano with respect to community engagement and environmental stewardship. As well, Cameco and Orano employ Community Liaisons, who are First Nation community members whose role is to support the implementation of the Collaboration Agreement within the Athabasca Basin communities.

The AJES shares information regarding areas of interest specifically identified by community members and is an avenue for sharing of information between companies and AJES members. The AJES representatives and attendees are encouraged to bring forward any questions or concerns from community members and/or Leadership about Cameco and Orano's operations so that concerns can be addressed by company representatives. As appointed community members, AJES representatives provide guidance on community engagement strategies for planned and future site-based projects.

Together with the Community Liaisons, the AJES meets on a regular basis (a minimum of four times per year).

AJES Discussions in 2023

In 2023, AJES met in February in Stony Rapids, in June in Saskatoon, at McLean Lake in August, and virtually in November. Cameco, Orano, and YNLR each provided updates at these meetings. Operations of the currently active mines and mills are reviewed at each meeting with a focus on Rabbit Lake, Cigar Lake and McClean Lake; thus, AJES receives notices of incidents quarterly prior to notification from the CNSC's ROR. In 2023, the Committee also participated in the design of upcoming investigations of the Community-Based Environmental Monitoring Program (CBEMP), reviewed past CBEMP report findings, the Human Health Risk Assessment (HHRA), monitoring plans for the decommissioned Beaverlodge Project, and Terms of Reference for AJES.

CBEMP conducts environmental monitoring throughout the Athabasca Basin. The CBEMP was developed to address potential concerns about the safety of traditional food that community members in the seven communities in the Athabasca regions consume on a routine basis. The CBEMP continues to show the health benefits of consuming traditional country foods, and that traditional foods and water near these communities remain safe. As a result, regular consumption of locally collected fish, meat, and vegetation is encouraged. The exceptions are select water bodies in the Uranium City area; here, residents are encouraged to respect local water and fish advisories. A Human Health Risk Assessment (HHRA) was conducted for each community in 2023 using CBEMP data. The HHRA results show that traditional foods are safe for consumption, and that community members should continue regularly eating locally harvested fish, wild game, berries, and plants, but again, while respecting fish and water advisories in the Uranium City region.

The AJES has some familiarity with other regional monitoring programs such as the Eastern Athabasca Regional Monitoring Program (EARMP) and Independent Environmental Monitoring Program (IEMP), which are partly and wholly funded by the CNSC, respectively. The IEMP is discussed in the 2023 ROR. These programs also demonstrate that country foods remain safe and do not pose a risk to Athabasca Basin communities.

Closing Remarks

Under the Collaboration Agreement, AJES is the primary liaison for environmental information sharing between Cameco, Orano, YNLR, and the seven Athabasca Basin communities. However, through guidance from the sub-committee, Cameco and Orano also undertake additional activities such as site visits, community meetings, distribution of factsheets, and discussions with Elders, youth or community members, in addition to the activities of the Community Liaisons to help engage the communities. Information at the request of the AJES and as it pertains to the ROR CMDs have been shared with AJES members through its quarterly meetings. AJES members acknowledge receipt and information contained within the AJES meeting packages and minutes and appreciate the opportunity to provide this intervention to the CNSC Commission.