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Supplementary Information

Renseignements supplémentaires

Presentation from the Manitoba Métis Federation

Présentation de la Fédération des Métis du Manitoba

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

Manitoba Métis Federation

Regulatory Oversight Report for Uranium Mines, Mills &
Decommissioned Sites in Canada

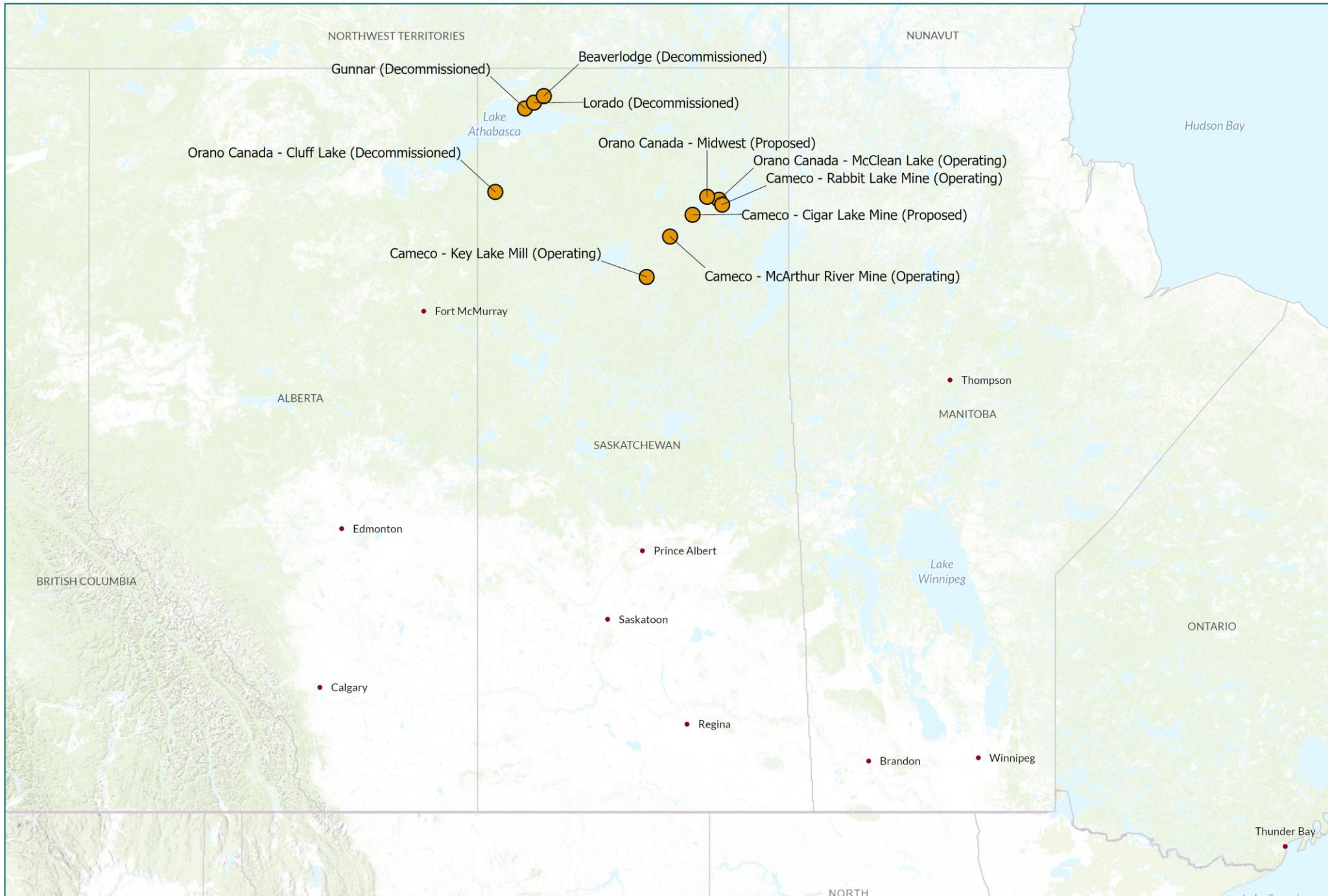
Key Findings, Concerns & Recommendations



Manitoba Métis Federation

- The MMF is mandated to promote, protect, and advance the collectively held Rights of the Red River Métis.
- Red River Métis Citizens rely on the lands and water throughout the National Homeland, and resources they provide. The MMF maintains an important role in working on behalf Red River Métis Citizens to ensure enduring stewardship of the land and water
- Red River Métis Citizens have great interest in ensuring that ongoing activities, compliance and regulatory activities occurring at active and decommissioned UMM facilities throughout the National Homeland are done so responsibly.

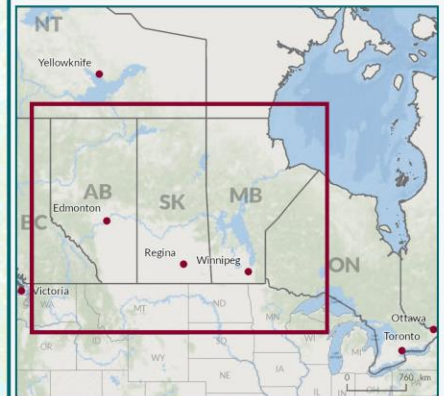




MANITOBA MÉTIS FEDERATION

**Uranium Mines & Mills
in the National Homeland
of the Red River Métis**

- Uranium Mine / Mill
- City / Town



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Increase in Non-Compliance

- Non-compliance numbers have surged in 2022 and 2023, with 2023 having the highest instances of non-compliance reported.
- Need for better understanding of drivers of non-compliance in UMMs

Recommendation: CNSC continue to work with licensees to better understand industry-wide trends in non-compliance and provide direction to address the issues.





Evaluation of SCAs

- There is a disconnect between the number of non-compliance and the SCA evaluation.
- Expired PPE, which has the potential for adverse impacts did not result in a downgrade on the SCA evaluation.

Recommendation: CNSC provide additional context for evaluation criteria and explanation on SCAs in face of non-compliance issues



Reportable Releases to the Environment

The CNSC's *Nuclear-Related Event Reports* webpage and the Licensee's webpage on *Reportable Releases to the Environment* present inconsistent information.

Example:

- The ROR lists **seven releases** reported to the CNSC from the Key Lake Facility.
- However, the CNSC webpage reports **only one incident** across all UMMs.

Impact:

- This inconsistency, combined with unreported transportation-related events, undermines confidence in the **accuracy** and **transparency** of shared information.

Recommendation: CNSC should review and align communication across the ROR, its own resources, and Licensee platforms to enhance **accuracy** and **timeliness** in reporting.



Environmental Release Disclosure

- The MMF supports the adoption and implementation of REGDOC 2.9.2 and identifies there is still opportunity for improved public disclosure and communication.
- Environmental release information is not easily accessible to those who could be most vulnerable and there is a lack of access to real-time environmental data related to environmental release and public dose exposure.

Recommendation: CNSC and/or Licensees work with the MMF to understand appropriate communication channels to relay information to Citizens in real-time.



Decommissioning & Waste Management

- Closure strategies should align with an end-state plan defining post-project goals for affected lands and waters.
- Licensees should actively work towards end-state goals throughout the project lifecycle.

Recommendation: The ROR process can better report UMMs' alignment with PDP/DDPs and end land-use objectives.



Packaging & Transportation

- The MMF is concerned about the lack of a cohesive cradle-to-grave assessment for nuclear materials.
- Transportation of nuclear substances through lower-control areas poses elevated environmental and public safety risks, especially across the National Homeland of the Red River Métis.

Recommendation: The MMF requests improved ROR reporting on transport incidents and an evaluation of first responders' emergency preparedness along primary transportation corridors



Psycho-Social Impacts

- Potential impacts of UMMs can be considered under two categories:
 - Impacts related to direct effects, such as impacts to biophysical, health and social environment.
 - Impacts related to perceived effects, such as fear, misinformation, perceptions and/or other beliefs about harm that could arise as a result of interaction with nuclear or radioactive substances.

Recommendation: CNSC to work in collaboration with the MMF and Red River Métis Citizens across the National Homeland to collect information on perceptions and report on findings to better address concerns.



Key Recommendations

The following are the key recommendations identified through review of the Regulatory Oversight Report (ROR) for Uranium Mines and Mills (UMMs):

- Address the rise in non-compliance
- Enhance Emergency Preparedness
- Improve Environmental Protection and Communication
- Advance Waste Management & Decommissioning Practices
- Strengthen Oversight in Transport
- Improve Transparency in Reporting Psycho-Social Concerns

