



CMD 26-H102.2

Date: 2026-02-13

**Written Submission from
Ya'thi Néné Lands and Resources**

**Mémoire de
Terres et ressources de Ya'thi Néné**

In the matter of

À l'égard du

Saskatchewan Research Council

Saskatchewan Research Council

Application to renew licence for the Gunnar
Mine Remediation Project

Demande visant à renouveler son permis
pour le projet de remise en état du site
Gunnar

Hearing in Writing

Audience par écrit

May 2026

Mai 2026

YA'THI NÉNÉ LANDS AND RESOURCES INTERVENTION

*In the matter of Saskatchewan Research Council's request to renew the nuclear substance
licence for the Gunnar Legacy Uranium Mine Site*



13 February 2026

Introduction

The Gunnar Mine and Mill Site is located on the north shore of Lake Athabasca, 25 km southwest of Uranium City. The Project operated from 1955 to 1963 and produced uranium ore from both open pit and underground mining. At the height of production, over 800 people lived and worked at the Gunnar Site; in addition to the mine and mill workings, infrastructure on site included residences, retail and services (including a shopping mall), post office, school, hospital, recreational facilities, and community center.

The Gunnar Mine and Mill closed in 1964 with very little decommissioning and remediation aside from flooding of the open pit and underground mine workings with water from Lake Athabasca, plugging the mine shaft with concrete, and installation of concrete bulkheads over the mine shaft and two raises. All buildings, waste rock, and tailings were left untouched.

In 2006 the Government of Saskatchewan appointed the Saskatchewan Research Council (SRC) to manage restoration of the site as part of Project Cleanup of Abandoned Northern Sites (Project CLEANS), which also includes Lorado and 35 other abandoned uranium mines and exploration sites in the region. Remediation at Gunnar commenced in 2010 and was expected to be completed in autumn 2025 but is ongoing; to date, buildings have been demolished and removed, and most tailings have been covered and revegetated.

During remediation activities, environmental monitoring is conducted under the Operation Monitoring Program; this program changes as needed to reflect remediation activities. Once remediation is completed, the Follow-up Monitoring Plan will be implemented. This Monitoring Plan is based on the Environmental Impact Statement (EIS), approved in 2014 by Saskatchewan's Ministry of Environment (MOE) and the Canadian Nuclear Safety Commission (CNSC), with some refinements and additions.

It is YNLR's understanding that environmental monitoring will occur for many years (~10-15) until SRC applies to revoke its licence with the CNSC and transfer the Gunnar property to the Institutional Control Program (ICP) administered by the Government of Saskatchewan's Ministry of Energy and Resources (MER). If the property is accepted into ICP, environmental monitoring will become the responsibility of MER under this program.

Background of YNLR and Nuhenéné

The Athabasca Denesųliné First Nations of Black Lake, Fond du Lac and Hatchet Lake established YNLR to support the management of consultation and engagement with the First Nations throughout their traditional territory of Nuhenéné. YNLR also supports consultation and engagement activities with municipal communities in the Athabasca Basin (Stony Rapids, Wollaston Lake Post, Uranium City, and Camsell Portage). The Athabasca Leadership have mandated YNLR to protect Nuhenéné and promote the interests of its residents.

YNLR is a federally incorporated non-profit organization that is 100% owned by the Athabasca First Nations and Communities. Strategic direction and decision making is provided through elected Leadership and governance structures. YNLR operates five offices in Saskatchewan (Saskatoon, Fond du Lac, Black Lake, Hatchet Lake, and Uranium City) and staff utilize traditional and scientific knowledge to support informed decisions related to land protection and promoting interests of all Basin residents.

YNLR works to protect the lands and waters of Nuhenéné for the long-term benefits of its member Denesųliné First Nations and Athabasca communities, guided by their knowledge, traditions, and ambitions, while being a respected partner in relations with industries, governments, and organizations who seek to operate in Nuhenéné. Engagement with the Athabasca Communities is necessary to ensure respect for their constitutionally protected rights, earn their consent for storage and disposal of radioactive waste as required by the *United Nations Declaration on the Rights of Indigenous Peoples*, and secure social licence for activities affecting their rights and interests.

The First Nation members of YNLR are all signatories to treaties with the Crown.¹ A significant majority of the residents of the municipalities represented by YNLR are also Aboriginal persons,² with Aboriginal and/or Treaty rights protected by section 35 of the *Constitution Act, 1982*.

References in this intervention to “the Aboriginal and Treaty rights of YNLR members”, refers to the Aboriginal and/or Treaty rights, as the case may be, held by the First Nations, and/or exercised by the Aboriginal persons resident in the municipalities, as the case may be.

Engagement Between SRC and YNLR

Ya'thi Néné Lands and Resources (YNLR) works to protect the lands and waters of Nuhenéné, the traditional territory of the Athabasca Denesųliné, and to support the interests of its member communities in northern Saskatchewan. YNLR's involvement in uranium legacy projects, including the Gunnar Mine and Mill Site, focuses on ensuring that remediation and monitoring activities are conducted in a way that considers community perspectives, traditional land use, and potential impacts to Treaty rights.

YNLR has engaged primarily with the Saskatchewan Research Council (SRC), the organization responsible for the remediation of Gunnar under Project Cleanup of Abandoned Northern Sites (Project CLEANs). This engagement has included reviewing SRC's Follow-up Monitoring Program, participating in site inspections and tours, and providing input on subsequent monitoring plans. Since March 2023, YNLR's role at Gunnar has been formalized through a Services Agreement with SRC that outlines responsibilities for site visits, environmental and cultural monitoring, and review of relevant documents. YNLR Community Land Technicians (CLTs) have participated in field activities, providing trusted communication between the communities and SRC regarding remediation and monitoring efforts.

¹ Fond du Lac and Black Lake Denesųliné First Nations are both signatories to Treaty 8. Hatchet Lake Denesųliné First Nation is a signatory to Treaty 10.

In May 2025, YNLR staff and community members participated in an on-site visit to the Gunnar Mine and Mill Site, where they observed ongoing remediation activities, reviewed progress on tailings and waste management, and discussed post-remediation monitoring plans with SRC staff. This visit provided an important opportunity for YNLR and community members to directly engage with the site and strengthen understanding of remediation efforts.

In addition, YNLR members have taken part in CNSC's Independent Environmental Monitoring Program (IEMP) involving Gunnar and other current and historical uranium sites, supporting transparency and providing community perspectives on environmental conditions.

Through this work, YNLR helps ensure that remediation and monitoring at Gunnar are informed by community knowledge and priorities, and that information about the site is communicated to Athabasca Basin residents in a culturally relevant and understandable manner.

Document Timeline and Submission

YNLR was notified of Saskatchewan Research Council's application for a renewal of its Nuclear Substance and Radiation Devices Licence for the Gunnar site on 7 August 2025 and applied for participant funding shortly thereafter. YNLR received the fully executed funding agreement on 1 December 2025.

Commission Member Documents submitted by CNSC staff and Saskatchewan Research Council were made available in January 2026.

In preparation of this intervention, YNLR undertook the following activities:

- Participated in meetings with the YNLR Board of Directors, Athabasca Land Protection Committee, and CNSC staff, including both in-person and virtual sessions
- Conducted a technical review of the CMDs and supporting materials
- Conducted a legal review

YNLR is providing this submission on behalf of its member communities. This intervention is intended to assist the Commission by summarizing key issues relevant to the Application. YNLR and its advisors have undertaken as much analysis as possible within the time available and appreciate the opportunity to participate in the Commission's review process.

YNLR Concerns and Recommendations

In light of the Gunnar site's history, its location within Nuhenéné, and the long-term stewardship responsibilities associated with legacy uranium mines in the Athabasca Basin, Ya'thi Néné Lands and Resources respectfully recommends that, should the Commission approve the requested licence renewal, it includes or reinforce expectations in the following areas:

1. Consideration of Cumulative Effects and Impacts to Treaty Rights

That CNSC give substantive and meaningful consideration to cumulative effects and their impacts to exercise of Treaty rights in regulatory decision-making, consistent with contemporary jurisprudence. We request that the Commission explicitly acknowledge in its reasons for decision the historical context in which uranium development occurred in the region, the cumulative environmental effects that persist today, and the implications of those legacy effects for the past, current, and future exercise of Treaty rights. CNSC should consider the ways in which granting the renewal will contribute to the overall cumulative effects load in the Athabasca Basin, and particularly in the Uranium City region where multiple historical sites have resulted in a legacy of environmental damage. CNSC should also consider current mineral exploration activities and the reasonable prospect of future mineral development and how these pressures may interact with the current state of the environment in the exercise of Treaty Rights. Consultation and engagement during the renewed licence term should explicitly address ongoing legacy effects of historical uranium mining and cumulative impacts on Treaty rights, and that reporting on Indigenous engagement describe how such concerns are being tracked, considered, and responded to over time.

2. Justification for the Length of the Licence Term and Continuity of Regulatory Scrutiny

That SRC and CNSC clearly articulate the rationale for the proposed five-year licence renewal, including whether SRC anticipates requiring the full term to complete remaining remediation activities, the work program and schedule for the licence period, and contingencies for potential delays and how such matters will be communicated to communities. YNLR and the Athabasca Basin communities would appreciate receipt of comprehensive and long-term project timelines and activities rather than piecemeal information through requests for successive licence renewals.

We request that the Commission explicitly confirm, if the licence renewal is approved, the Gunnar project will remain subject to the same level of regulatory oversight, compliance verification, inspection frequency, and environmental protection review as under the current licence, and that any material changes to oversight or reporting expectations be communicated to communities and reflected transparently in licence conditions or associated regulatory documents.

3. Data Disclosure, Presentation to Communities, and Community Involvement

That CNSC and SRC provide clear disclosure of data used to attribute surface- and groundwater quality exceedances of the Gunnar site. We also request estimates of variance of contaminant metrics and reasons for potential uncertainty, including information on statistical power of monitoring programs to detect environmental change and details of retrospective analyses and predictive modeling exercises.

We request that YNLR and Athabasca Basin communities be granted access to historical and current monitoring results in formats such as maps, figures, and summary tables easily understood by community members. This information should be communicated to Basin residents through regularly scheduled community meetings and presentations using non-technical language and visual materials. YNLR appreciates and welcomes continued involvement in SRC's monitoring efforts, including assisting with sampling field work, and participation in site inspections. We welcome the opportunity to assist with dissemination of monitoring results to Athabasca Basin communities, and request

advance notice of SRC's plans to visit Basin communities so that we may better assist with SRC's consultation and engagement activities.

4. Transition to Institutional Control

That milestones and reporting requirements related to readiness for eventual transfer to Saskatchewan's ICP be clearly articulated during the renewed licence term. In particular, prior to any consideration of release from licensing and transfer to the ICP, SRC and CNSC staff must be required to collaborate with YNLR to develop performance objectives and indicators which meaningfully incorporate and address the concerns, interests and rights of YNLR members. As YNLR has explained in past submissions to the CNSC, the objectives and indicators often assigned to assess the readiness of decommissioned projects to the ICP do not adequately consider Aboriginal and Treaty rights. Our rights must not be an afterthought, or additional consideration. They must be incorporated directly into the primary substantive measures of successful decommissioning. We recommend also that communities be informed well in advance of any application to revoke the licence, and that future monitoring and engagement responsibilities under ICP be clearly communicated prior to any transfer. YNLR acknowledges ongoing work to revise the ICP framework and notes that YNLR has been actively engaged in this process. YNLR strongly encourages MER to continue this engagement to ensure that the framework meaningfully reflects Indigenous perspectives, rights, and long-term stewardship priorities.

Closing Remarks

The Gunnar legacy uranium mine site is located within Nuhenéné and has long been used and valued by Athabasca Denesųliné and Athabasca Basin communities. Ya'thi Néné Lands and Resources appreciates its ongoing engagement with the Canadian Nuclear Safety Commission and Saskatchewan Research Council regarding activities at Gunnar and other legacy sites in the region.

This submission summarizes YNLR's concerns and recommendations arising from the Commission Member Documents prepared by CNSC staff and from SRC's licence-renewal application for the

Gunnar site. YNLR respectfully requests that the Commission consider these matters carefully in its deliberations.

Once again, thank you for the opportunity to provide this intervention. YNLR looks forward to continuing to work constructively with both the CNSC and SRC to support long-term protection of the lands and waters of Nuhenéné and the well-being of Athabasca Basin residents.