



To / À Candace Salmon
Commission Registrar, CNSC

From / De Luc Sigouin
Director General, DNCFR, CNSC

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Subject / Objet CNSC Staff’s Review of Cameco Corporation’s July 16, 2024, Request for Confidentiality for *Decommissioned Beaverlodge Mine Site: Model Update and Environmental Risk Assessment, July 2020*

PURPOSE

The purpose of this memorandum is to provide CNSC staff’s comments and recommendations to the Commission regarding the matter of Cameco Corporation (Cameco)’s request to protect from public disclosure the following document:

Decommissioned Beaverlodge Mine Site: Model Update and Environmental Risk Assessment, Canada North Environmental Services, July 2020. Submitted to CNSC staff on September 8, 2020 (e-Doc 6379444).

CNSC staff included a reference to the above document in *CMD 25-H3 Cameco Corporation Request to Revoke the Current Licence and Release the Beaverlodge Project to the Institutional Control Program* (e-Doc 7240287). Cameco was informed that all references would be made available to the public on request, unless they were considered confidential. Cameco subsequently submitted a *Request for Confidentiality* to the Registry on July 16, 2024.

The CNSC registry subsequently requested¹ that CNSC staff provide its advice to the Commission on the matter.

DISCUSSION

Cameco has consistently requested that their Environmental Risk Assessments (ERAs) for uranium mine and mill sites, including the Beaverlodge site, be considered commercially sensitive and therefore confidential. To CNSC staff’s knowledge, Cameco’s ERAs for uranium mine and mill sites, including the Beaverlodge site, are not available elsewhere.

¹ Young to Sigouin, November 7, 2024, e-Doc 7403051

A previous request for confidentiality was submitted to the Registry by Cameco for the Beaverlodge ERA as part of the March 24, 2022, hearing in the matter of *Cameco Corporation Application to Amend the Beaverlodge Waste Facility Operating Licence to Remove 18 Properties and Facilitate their Transfer to Saskatchewan's Institutional Control Program*. That request was granted by the Commission.

In response to previous questions regarding the public availability of Cameco's ERAs, CNSC staff met with Cameco on September 6, 2023, to get more information on why they consider ERAs for the operating uranium mine and mill sites to be confidential, and to determine whether more information could be provided to the public. Cameco personnel explained, similar to what they stated in their current request related to the Beaverlodge ERA, that they paid for research to be conducted and models to be developed as necessary inputs into their ERAs. Cameco stated that precise knowledge of this information could be beneficial to their commercial competitors who are seeking to operate uranium mines and mills in northern Saskatchewan, and who will themselves have to develop ERAs. Cameco also noted that there have been multiple requests through the *Access to Information Act* for their documentation, including their ERAs, which they believe were initiated by commercial competitors who have proposed uranium developments in northern Saskatchewan. CNSC staff can confirm that ATIP requests have been received and processed related to Cameco documents, and that in those instances, redacted copies were provided in accordance with relevant legislation. CNSC staff can further confirm that there are multiple uranium projects in various stages of approvals in northern Saskatchewan, in what appears to be a commercially competitive environment.

In response to Cameco's current request for confidentiality, CNSC staff again met with Cameco on October 25, 2024, to discuss why Cameco considers the Beaverlodge ERA to be confidential, and to discuss options for release such as redaction. Cameco personnel indicated that even sections such as the results or conclusions could be used to determine commercially sensitive information, and therefore significant blacklining would be required. Cameco indicated that they consider a substantially redacted copy to be detrimental to effective communications with Indigenous persons and the public, when compared to a summary document.

To meet the need for transparency, Cameco has prepared summary versions of their ERAs which are available to the public. CNSC staff found that Cameco's [ERA summary](#) for the Beaverlodge site provides an accurate albeit high level summary of the document in question and note that other documents, such as annual reports which include information on water quality monitoring dating back to 2009, are publicly available on Cameco's [Beaverlodge](#) website. Some intervenors have stated that Cameco's ERA summaries are relatively brief. During the September 2023 meeting, CNSC staff conveyed to Cameco that their summaries could be more substantial while meeting Cameco's desire for confidentiality. Cameco agreed to update and expand on these summaries as part of the next submissions of the ERA for their operating sites.

CONCLUDING STATEMENTS AND RECOMMENDATIONS

CNSC staff have reviewed Cameco's request for confidentiality but cannot offer a position on whether the release of the information is likely to lead to commercial disadvantage for Cameco – CNSC staff suggest that Cameco be contacted if further justification on this aspect is required. CNSC staff note that Cameco has consistently treated its ERAs as confidential and has received protection in the past for this ERA.

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