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Oral Presentation

Exposé oral

Written submission from the Athabasca Chipewyan First Nation

Mémoire de l'Athabasca Chipewyan First Nation

In the Matter of

À l'égard de

**Regulatory Oversight Report for Uranium
Mines, Mills, Historic and Decommissioned
Sites in Canada: 2017**

**Rapport de surveillance réglementaire des
mines et usines de concentration d'uranium et
des sites historiques et déclassés au Canada :
2017**

Commission Meeting

Réunion de la Commission

December 12, 2018

Le 12 décembre 2018

Marc Leblanc, Secretary of the Commission
Canadian Nuclear Safety Commission
80 Slater Street P.O. Box 1046, Station B
Ottawa ON K1P 5S9

Nov 27 2018
Filed by email

Dear Secretary of the Commission

RE: ACFN response to the Canadian Nuclear Safety Commission Regulatory Oversight Report Uranium Mines, Mills, Historic and Decommissioned sites in Canada 2017 report.

CMD 18-M48, Dated October 12th, 2018.

1. Introduction

The Athabasca Chipewyan First Nation communities and home lands are located on the East side of the Athabasca Basin and thus down stream from Uranium Mining activities included in this report. Protecting the supply of uncontaminated water is of prime importance for Indigenous communities around Fort Chipewyan area. Further, ACFN members feel drinking water has already been compromised by the industrial development of the oil sands, forestry activities as well as from farming and municipal effluent This email is meant as a brief overview of ACFN's concerns, with our full comments will be provided at the workshop in Saskatoon Dec 11-13, 2018.

2. Concerning remediation Mine sites

The Historic site of **Gunner Mine**, a large open pit with contaminated water and with underground chambers that are located on the North side of Lake Athabasca. These sites also pose concerns with extreme rain runoffs and soil erosion that will ultimately end up in Lake Athabasca. This is a growing concern as climate change is increasing both the frequency and severity of precipitation, increasing the likelihood of contamination.

The decommissioned site of **Cluff Lake mine**. The Cluff Lake mine site is located near the Douglas River which flows west towards Alberta to become the Old Fort River system. This system flows adjacent to ACFN's N22 reserve on the south shore of Lake Athabasca and into Lake Athabasca south-east of Fort Chipewyan, Alberta. It is important to note, that many of our ACFN members were raised on N22, continue to utilize this area for traditional activities and consider it home, particularly in and around Cluff Lake and Carswell Lake. Of particular concern to ACFN members are the tailings pond cover and ensuring the pond's adequate containment. Is the embankment compromised or showing signs of it? Is the tailings pond's cover impermeable? Is there a risk posed from rain water leaching into the tailings ponds or from run off? Does there need to be improved containment and enclosure efforts required to secure the area from radioactivity?

(i) Meaningful Engagement

These mine sites are in ACFN's traditional territory and as such our members have a right to be consulted on all industrial or resource extraction activity on our lands. Unfortunately, the oversight report does not show the eastern side of the Athabasca basin where many ACFN members live. The members living in that area need to be included in any consultation going forward. To improve ACFN's confidence in the regulatory process, our members need to participate in inspections and tours of decommissioned sites, and have access to inspection reports from CNSC/SRC inspectors on legacy Mine sites that may affect the quality of consumable water down River.

Thank you for this opportunity to participate, we look forward to providing more fulsome remarks on the report at the workshop in Dec.

Sincerely,

Jay Telegdi
Manager Government Relations
Athabasca Chipewyan First Nation