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**Written submission from the
Saskatchewan Mining Association**

**Mémoire de l'Association minière
de la Saskatchewan**

In the Matter of the

À l'égard d'

Orano Canada Inc. – Cluff Lake Project

Orano Canada Inc. – Projet de Cluff Lake

Application for the renewal of the Uranium
Mine Decommissioning Licence for the
Cluff Lake Project

Demande de renouvellement du permis
de déclassement de la mine d'uranium de
Cluff Lake

Commission Public Hearing

Audience publique de la Commission

May 15, 2019

Le 15 mai 2019

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April 15, 2019

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9

via e-mail: cns.interventions.ccsn@canada.ca

RE: SMA Intervention - Renewal of Orano's Cluff Lake Decommissioning Licence

The SMA is the voice of the mining industry in Saskatchewan and has the role of liaison and consultant with government and public to ensure the safe, profitable and orderly development of the mineral resources of the province. Environmental protection and stewardship are important to the members of the SMA as shown by their commitment to environmental planning, monitoring, compliance and reclamation. Our members are also among the largest industrial employers of Indigenous people in Canada. The SMA represents over 35 member companies including producers and exploration companies. Our mission is to advance a safe, sustainable and globally competitive exploration and mining industry in Saskatchewan that benefits all residents of the province.

The Saskatchewan Mining Association is providing this intervention in support of the federal and provincial regulatory process that recognizes decommissioning has an end-state, founded on the importance of agreed closure and post-closure commitments, that provides proponent and stakeholder certainty. There are requirements and expectations on the mining industry to plan, design, communicate, complete, and verify that decommissioning works will provide long-term ecosystem integrity. It is important that the regulatory framework, within which decommissioning takes place, provides certainty for proponents and stakeholders.

Orano has submitted a Detailed Post-Decommissioning Plan and, given that the agreed works and performance has been achieved, we support the request to renew the Cluff Lake Project license with recognition that the site has successfully transitioned from decommissioning to post-decommissioning. We understand that within the proposed licence term, Orano intends to apply to transfer responsibility for the Cluff Lake property to the Province of Saskatchewan under the Institutional Control (IC) Program established by Saskatchewan's Reclaimed Industrial Sites Act.

The SMA is supportive of the IC Program and believes that provincial IC is reliable, robust, and provides greater certainty to current and future generations and industry that mining in Saskatchewan can be safe, sustainable, and globally competitive.

The SMA encourages the continued collaboration of the Canadian Nuclear Safety Commission and the Saskatchewan Ministries of Environment and Energy and Resources as Saskatchewan uranium mining projects advance towards and achieve final closure, including future requests for CNSC de-licensing and transfer to IC.

Yours Sincerely,



Brad Sigurdson
Vice President – Environment, Safety and Regulatory Affairs

cc Dale Huffman - Vice-President, Health, Safety, Environment and Regulatory Relations (Orano)
Diane Martens - Health, Safety and Environment Project Manager (Orano)
Sarah Benson - Environmental Scientist (Orano)
Mark Langdon - Supervisor, Uranium Mines and Mills (CNSC)
Ron Stenson - Senior Project Officer (CNSC)
Pam Schwann – President (SMA)