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**Written submission from the  
Athabasca Joint Engagement  
and Environmental  
Subcommittee**

**Mémoire de  
l’Athabasca Joint Engagement  
and Environmental  
Subcommittee**

**Regulatory Oversight Report for  
Uranium Mines and Mills in  
Canada: 2019**

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**Rapport de surveillance  
réglementaire pour les mines et  
usines de concentration d’uranium  
au Canada : 2019**

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Commission Meeting

Réunion de la Commission

**December 10, 2020**

**Le 10 décembre 2020**

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November 13, 2020

Jerilyn Benonie  
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Re: Intervention letter on Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2019

Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am pleased to provide a letter regarding the 2019 Regulatory Oversight Report (ROR) for Uranium Mines and Mills in Canada.

The seven Athabasca Basin communities (including the Denesuline First Nations of Black Lake, Fond du Lac and Hatchet Lake, along with the communities of Stony Rapids, Wollaston Lake, Uranium City and Camsell Portage) signed the Ya'thi Nene Collaboration Agreement<sup>1</sup> (CA) in 2016 with Cameco and Orano. The agreement confirms the partnership between the communities and industry in development of the uranium resources in the Athabasca Basin. The agreement also builds on an impact management agreement signed in 1999, and is structured on five pillars of workforce development, business development, community investment, and community engagement and environmental stewardship.

In 2019, the CA report to the community outlined the great work being done by all those involved under the agreement and noted \$62.2 million was provided for business development, community investment and workforce development to the Basin communities.

In addition, under the agreement the AJES were created and appointed as the primary liaisons between Cameco, Orano, the Athabasca First Nations and Athabasca communities for the sharing of environmental monitoring and other environmental information and act as the first point of contact for Cameco and Orano with respect to community engagement matters.

Cameco and Orano maintained an established relationship with the Athabasca communities prior to the CA. For over two decades, Cameco and Orano have engaged with Athabasca residents

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<sup>1</sup> The Parties to the Ya'thi Nene Collaboration Agreement are: Cameco Corporation, Orano Canada Inc., Black Lake First Nation, Hatchet Lake First Nation, Fond du Lac First Nation, the community of Stony Rapids, the community of Uranium City, the community of Camsell Portage, and the community of Wollaston Lake.

through subcommittees such as the Athabasca Working Group, the Environmental Quality Committee and through direct communication with community members and leadership.

The AJES meets at a minimum of four times per year and consists of the following members:

- 1 representative from Cameco
- 1 representative from Orano
- 1 representative from the Athabasca First Nation of Black Lake
- 1 representative from the Athabasca First Nation of Hatchet Lake
- 1 representative from the Athabasca First Nation of Fond du Lac
- 1 representative for the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, Wollaston Lake)

The Ya'thi Néné Lands and Resource Office was also created at the time of the Agreement for the benefit of the Athabasca Basin communities. This office has a broad mandate, which also includes the promotion and enhancement of the environmental health of the Athabasca Region. As this important environmental mandate is congruent with the AJES, one of the other members on the AJES is:

- The Executive Director of the Ya'thi Néné Lands and Resource Office

Community members are encouraged to bring forward any questions or concerns about the operations and the environment to their community AJES representatives. The AJES members will then raise the question during the quarterly meetings so that it can be addressed by the company representatives. As the local experts, the community AJES representatives also play an important role for the companies by providing advice, based on interest and need, regarding community engagement strategies for planned and future site-based projects.

A key role of the AJES is to review the Community-Based Environmental Monitoring Program (CBEMP). This independent monitoring program was formerly known as the Athabasca Working Group (AWG) environmental monitoring program, which conducted monitoring throughout the Athabasca Basin. The AWG program has been a big success, and since its initiation in 2000, routinely demonstrated that samples collected nearby the Athabasca communities are not influenced by the active uranium mining and milling operations in the region.

The CBEMP focuses on a single community area per year to conduct a dietary food survey and associated monitoring. Initiated in 2018, the CBEMP has been successfully completed in Stony Rapids, Black Lake and Fond du Lac, with results presented to leadership and community members.

Also recognized by the AJES is the Eastern Athabasca Regional Monitoring Program (EARMP). AJES is aware that the EARMP monitoring work is partially funded by the CNSC and is in full support of the program. The AJES works to ensure information is shared regarding areas of interest that have specifically been identified by community members.

In summary, the AJES is a single, joint forum for the companies and community members to share information on matters related to the environment, the operations, proposed authorizations, and to address issues raised by the communities. The single forum ensures that adequate operational and



regulatory updates are reaching the Athabasca Basin communities ensuring community members are adequately informed and that community members' concerns are heard during engagement opportunities with the companies.

The AJES has reviewed the ROR submission, we have been well informed about the operations included in the 2019 submission, both in operation and during care and maintenance.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jerilyn Benonie', with a horizontal line extending to the right.

Jerilyn Benonie, AJES - Hatchet Lake Denesuline First Nation

cc. Georgie McDonald AJES - Fond du Lac Denesuline First Nation  
John Toutsaint, AJES - Black Lake Denesuline First Nation  
Victor Fern, AJES - Athabasca Municipalities (Interim)  
Garrett Schmidt, AJES - Ya'thi Néné Lands and Resource Office  
Glenn Lafleur, AJES - Orano  
Kristin Cuddington, AJES - Cameco