



**Oral Presentation**

**Exposé oral**

**Written submission from the  
Métis Nation-Saskatchewan**

**Mémoire de la  
Métis Nation-Saskatchewan**

In the Matter of the

À l'égard de

**Cameco Corporation,  
Cigar Lake Operation**

**Cameco Corporation,  
établissement de Cigar Lake**

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Application for the renewal of Cameco's  
uranium mine licence for the Cigar Lake  
Operation

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Demande de renouvellement du permis de mine  
d'uranium de Cameco pour l'établissement de  
Cigar Lake

**Commission Public Hearing**

**Audience publique de la Commission**

**April 28-29, 2021**

**28 et 29 avril 2021**

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March 29, 2021

Canadian Nuclear Safety Commission  
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Ottawa, ON K1P 5S9

By email: [cns.interventions.ccsn@canada.ca](mailto:cns.interventions.ccsn@canada.ca)

To the Canadian Nuclear Safety Commission,

**Re: Cameco Cigar Lake Licence Renewal Application: Written Intervention from the Métis Nation of Saskatchewan (CMD: 21-H2.1)**

To begin, we would like to acknowledge that the land on which our people live and work, and on which these proceedings for the licence renewal are taking place, is the traditional and current territory and Homeland of the Métis (the “**Homeland**”).

The Métis emerged as a distinct Indigenous people and nation in the historic Canadian Northwest during the 18th and 19th centuries. Saskatchewan is a part of the “historic Métis homeland,” which includes the three prairie provinces, Ontario, British Columbia, the Northwest Territories, and the northern United States. The Canadian government attempted to extinguish the historic Métis Nation through the issuance of “scrip” and land grants in the late 19th and 20th centuries. The Métis in Saskatchewan began organizing to address issues of Métis land rights and scrip in the 1930s and continued to grow and advocate for recognition as one of Canada’s Aboriginal peoples. Now, nearly 150 years after the first issuance of scrip, the Métis in Saskatchewan have a recognized government (the Métis Nation – Saskatchewan, or “**MN-S**”) that represents the political, socioeconomic, cultural, and educational interests of the provinces 80,000+ Métis citizens through a representative system based on 12 Regions and approximately 130 Locals. The MN-S established a Constitution in 1993 and since then has worked towards implementing Métis self-government efforts. In 2018 Canada agreed, through the Framework Agreement for Advancing Reconciliation, to work with MN-S to address Métis land claims within Saskatchewan, including specifically the Northwest Métis Land Claim (the “**Northwest Land Claim**”).<sup>1</sup> In 2019 Canada and MN-S signed the *Métis Government Recognition and Self-Government Agreement between Métis Nation – Saskatchewan and Canada* recognizing that MN-S represents the Métis of

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<sup>1</sup> <https://metisnationsk.com/wp-content/uploads/2019/03/Framework-Agreement-for-Advancing-Reconciliation-2018.07.pdf>

Saskatchewan and that the Métis of Saskatchewan have an inherent right of self-government that is protected by Section 25 and Section 35 of the *Constitution Act, 1982*.<sup>2</sup>

The development of the uranium mining industry within the Métis Homeland, beginning in the 1940s, has occurred with little input, consideration, or participation of the Métis communities that have been impacted and which will continue to live with the effects of uranium mining and its long-term legacy.

As already introduced, MN-S is advancing the Northwest Land Claim and has an interest in preserving and protecting these lands and their resources for the use and benefit of future generations. Métis are known in history for their role in trade, barter and the economic development of their communities. Métis are not against development where it is done in a manner consistent with their asserted rights, including under the Northwest Land Claim, and where such development respects Métis rights-based community, cultural, and economic activities.

In the preparation of this submission, the MN-S wants to draw to the attention of the CNSC to the principles by which it conducted its review. These are summarized next.

#### Review Principles

##### 1. United Nations Declaration on the Rights of Indigenous Peoples (“**Declaration**”)

The Government of Canada in 2016 endorsed the Declaration with a commitment to its implementation. In December 2020, the Government of Canada introduced Bill C-15. The legislation is currently moving through parliament for passage. MN-S is interested in the importance of understanding free, prior and informed consent (FPIC), and will express its interest in meaningful and effective participation in decision-making, including with respect to development, remediation, and storage of hazardous materials within the Homeland.

##### 2. Reconciliation

In 2015, the Truth and Reconciliation Commission of Canada issued its 94 Calls to Action among which were recommendations for reconciliation in the mining industry. Specifically, the MN-S will be looking at opportunities to promote reconciliation during this relicensing.

##### 3. Métis as s.35 Rights Holders

Métis people are recognized as protected “Aboriginal peoples” under s.35 *Constitution Act, 1982*, and assert Aboriginal rights protected thereunder, including *inter alia* rights to harvest and gathering animals, plants, and materials for personal, social, ceremonial and trade purposes, rights to self-government, and rights to land (i.e., Aboriginal title).

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<sup>2</sup> <https://metisnation.sk.com/wp-content/uploads/2019/06/M%C3%A9tis-Government-Recognition-and-Self-Government-Agreement-.pdf>

Ongoing development of the Homeland increases the likelihood that when the Northwest Land Claim is eventually resolved, the Métis may find their lands and resources changed and denuded.<sup>3</sup> The Supreme Court of Canada has noted that “Governments and individuals proposing to use or exploit land, whether before or after a declaration of Aboriginal title, can avoid a charge of infringement or failure to adequately consult by obtaining the consent of the interested Aboriginal group.”<sup>4</sup>

MN-S is also concerned that both historically and currently, Métis Aboriginal rights are often treated as a lower priority as compared with the Aboriginal rights of First Nations, which is not defensible under Canadian law.

The review of the relicensing includes comments related to Métis rights and title.

#### 4. Consultation and Engagement

The MN-S will provide its reflection on consultation and engagement in relation to the licensing of this project, and Métis Aboriginal rights and interests, including the Northwest Land Claim. The MN-S is concerned with the extent to which the CNSC are relying on Cameco to help it meet its consultation obligations. The MN-S will review the engagement efforts during the relicensing and reflect the adequacy of these activities to date for the purposes of the CNSC.

In closing, the MN-S notes that its review was limited to the filing documents and did not include a complete technical review as a result of timing and capacity constraints.<sup>5</sup> Overall, MN-S focused its comments in-line with long-term Métis Aboriginal rights, land claim, and self-government interests.

Sincerely,

**/s/ Mark Calette**

Mark Calette  
Senior Director Lands and Consultation  
Métis Nation - Saskatchewan

Attach.

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<sup>3</sup> *Haida Nation v. British Columbia (Minister of Forests)*, 2004 SCC 73 at para 33.

<sup>4</sup> *Tsilhqot'in Nation v. British Columbia*, 2014 SCC 44 at para 97.

<sup>5</sup> <https://www.cameco.com/businesses/uranium-operations/canada/cigar-lake/licence-renewal>

**Cameco Cigar Lake Licence Renewal Application:**  
**Written Intervention from the Métis Nation of Saskatchewan (CMD: 21-H2.1)**

The MN-S has focused its comments during this relicensing on Métis future interests, including in respect of the Northwest Land Claim, and how uranium mining engages these interests.<sup>6</sup>

The MN-S understands that Cameco is seeking a 10-year operating licence. Given that the anticipated life of mine will ultimately be followed by decommissioning, it is expected that this will not be the only licence renewal application. As Métis members and communities will be living with the legacy of this mine in the post-decommissioning period, our comments reflect Métis long-term interests in the area. The responses are organized according to the table of contents reflected in the filing application for CMD: 21-H2.1. This review considered the following documents:

- Cigar Lake Licensing Renewal – CNSC Commission Member Document (CMD)
- Cigar Lake Licensing Renewal - Application Letter
- Cigar Lake Licensing Renewal - Mining Facility Licensing Manual
- Environmental Management Program - Public Summary - Cigar Lake Operation
- Environmental Risk Assessment - Public Summary - Cigar Lake Operation
- Radiation Protection Program - Public Summary - Cigar Lake Operation
- Safety and Health Management Program - Public Summary - Cigar Lake Operation
- Preliminary Decommissioning Plan - Cigar Lake Operation

**Business Plan (Section 2.0)**

The MN-S notes that Cameco is projecting a current mine life for Cigar Lake to 2029. This projection has all the usual qualifications as to why this date may change. Given that 2029 is less than a decade away, the MN-S does question the 10-year licence and feels that this could have been better explained in the application. The MN-S notes that Cameco proposed to continue with the “current licensed production limits while transitioning to new ore zones within the mine” and that it intends to expand the mines physical infrastructure as part of this licence renewal. Cameco also intends to continue to enhance safety initiatives. The MN-S also notes that Cameco is committed to identifying potential employment and contracting opportunities.<sup>7</sup>

**Recommendations**

According to the 2019 *Métis Government Recognition and Self-Government Agreement between Métis Nation – Saskatchewan and Canada*, Métis have expressed an interest in opportunities for economic development, education, and training, as well as housing and infrastructure. The MN-S recommendations seek to address the next 10 years of operations, the decommissioning phase and the post-decommission environment. These recommendations will also help to address MN-S interests in UNDRIP<sup>8</sup> and Reconciliation.

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<sup>6</sup> MN-S is mindful of the relationships that Cameco has built specifically with the Northern Village of Pinehouse and Kineepik Métis local #9 and is not providing comments specific to that community.

<sup>7</sup> [Aboriginal Peoples Engagement - Supportive Communities - Cameco - 2014 Sustainable Development Report](#)

<sup>8</sup> [https://www.un.org/esa/socdev/unpfii/documents/DRIPS\\_en.pdf](https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf)

1. Participation in Cameco's activities: Require Cameco to enter into, through mutual agreement with MN-S, a formal process to provide MN-S with an active role in the development of the decommissioning plans and the post-decommissioning period. The MN-S is also interested in socio-economic opportunities that appropriately reflect its interests in the Homeland and under the Northwest Land Claim.  
Target date: Develop and implement, through mutual agreement between Cameco and MN-S, processes for MN-S active involvement and participation before December 31, 2021.
2. Métis Traditional Land Use Study: Require Cameco to support the collection and documentation of Métis specific traditional and present-day use study in Northern Regions #1 and #3 to inform decommissioning planning and the post-decommissioning period.  
Target date: Completion of the study by 2025.

### **Safety and Control Areas (Section 3.0)**

The review of the documents filed did not reveal any specific information on: (a) the extent to which Métis are involved in training and employment; (b) the extent to which Métis are represented within management levels of Cameco; or (c) steps that Cameco has taken to support the training and development of Métis employees in order to increase Métis representation within management levels of Cameco. It also has not disclosed whether in the first five years Métis have expressed concerns related to mine water management and health and safety practices. MN-S is therefore providing recommendations focused on collecting information against future planning.

### Recommendations

According to the 2019 *Métis Government Recognition and Self-Government Agreement between Métis Nation – Saskatchewan and Canada*, Métis have expressed an interest in opportunities for economic development, education, and training, as well as housing and infrastructure.

### **Human Performance Management (Section 3.3)**

3. Métis Economic Development Statistics: Require Cameco to provide the MN-S with the statistics on historic, current and projected Métis involvement in both direct (i.e., directly from Cameco) and indirect (i.e., through the use of contractors and subcontractors):
  - a. employment positions;
  - b. participation in education and training initiatives, including Métis participation in student employment programs and apprenticeships;
  - c. Métis representation within management positions and participation and representation within management training initiatives; and
  - d. value of goods and services procured from Métis businesses.To provide context, all disclosures should include comparative values for overall participation/spend, including disclosure of: (i) overall participation (including non-Métis and Métis); and (ii) overall Indigenous participation (including Métis).

Target date: Complete provision of Métis related statistics by June 30, 2021

### **Safety Analysis (Section 3.5)**

See comments under Decommissioning and Financial Guarantees below

### **Conventional Health and Safety (Section 3.9)**

See comments under Decommissioning and Financial Guarantees below

### **Environmental Protection (Section 3.10)**

See comments under Eastern Athabasca Regional Monitoring Program and Community Based Environmental Monitoring below

### **Waste Management (Section 3.12)**

See comments under Decommissioning and Financial Guarantees below

## **Other Matters of Regulatory Interest (Section 4.0)**

### **Indigenous Consultation (Section 4.1)**

These comments are focused on the adequacy of the consultation and engagement.

MN-S understand that Cameco is assisting the CNSC in its consultation and accommodation obligations. MN-S is uncertain as to the portions of Cameco's engagement on which the CNSC is relying to meet their duty to consult obligations. Broadly speaking, MN-S is concerned with the extent of the engagement shortfall based on the documents filed for this relicensing, and MN-S does not believe the CNSC has the information needed to meet duty to consult obligations specific to MN-S and the Métis of Saskatchewan.

MN-S notes that Cameco has held or plans to hold 70 events during the current licencing term (i.e., July 1, 2013 to June 30, 2021) to keep communities up to date on efforts and these are recorded in Cigar Lake annual reports. The primary audience mentioned by Cameco are described as including rights-bearing First Nation and Métis communities. The seven specific communities of Northern Region #1 (i.e., Black Lake Denesuline First Nation, Fond du Lac Denesuline First Nation, Hatchet Lake Denesuline First Nation, Northern Settlement of Camsell Portage, Northern Hamlet of Stony Rapids, Northern Settlement of Uranium City, Northern Settlement of Wollaston Lake) are part of the Athabasca Basin Communities covered by the Athabasca Collaboration Agreement between the mining interests of the area and the Dene. It needs to be noted that Métis are not part of this arrangement. The records filed with the relicensing made limited mention of engagement efforts with Métis. The one reference is in

.... Although the three First Nations and four municipalities are the primary audience for Cigar Lake, additional engagement is also focussed on local Métis people,....(pg 1, Executive Summary)



the Executive Summary, and there is also a tangential reference to meeting with Métis Local Presidents of the Uranium City Métis Local #50 and the Stony Rapids Métis Local #80.

MN-S is aware that Cameco has arrangements with a single Métis Local in Northern Region #3<sup>9</sup> regarding the Cigar Lake project. MN-S in the review of documents did not find any reference to engagement with Métis in Northern Region #3 during the relicensing, either through MN-S or directly. Nor was there any explanation as to why these communities were not part of any engagement effort. As a result, the MN-S questions the completeness of the engagement and consultation record. Engagement solely with Métis Local presidents cannot constitute adequate consultation from the perspective of the MN-S.<sup>10</sup> Aside from the communication with Métis in Northern Region #1, direct communication with the MN-S was limited and exclusively to confirm preparedness of MN-S to participate in the hearing. It commenced in December 2020 and continues today according to the record of consultation. This included efforts by the CNSC and Cameco.

The MN-S appreciates the challenges of communicating under Covid-19 restrictions. The MN-S has reviewed the YouTube update on the Cameco website. We did not see any summary of the engagement record related to this effort.

The MN-S views the efforts to engage with it and with MN-S Locals in the record as “information sharing” – the lowest rung of engagement practice. The MN-S was unable to locate any summaries for the 70 engagement events referenced<sup>11</sup> and whether any issues and concerns arose during these events for which Cameco needed to provide a response, and what the reception to the response may have been. Similarly, MN-S was unable to identify any opportunities provided during the period of engagement for a technical and socio-economic review and identification of Métis concerns by MN-S or even by an MN-S Local. Given that the CNSC will be relying on the record of engagement, the MN-S would have expected, at a minimum, true “consultation” as per the CNSC’s requirements for Indigenous consultation, engagement, and reconciliation<sup>12</sup>. The MN-S was looking for efforts on the part of Cameco that speaks to a serious effort to understand Métis concerns and identify measures to avoid, mitigate, or offset adverse impacts that may have been raised through engagement events and a meaningful process of identifying and reviewing Métis concerns.

### Recommendations

As per MN-S interests in Reconciliation and s.35 rights and title recognized by Canada, the MN-S has the following recommendations:

4. Delay to complete identification and review process: Delay the relicensing by 6 months to address the consultation shortfall identified above.

Target date: Completion of consultation by October 31, 2021

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<sup>9</sup> Local #9. There are 10 Locals in Northern Region #3 and 6 Locals in Northern Region #1.

<sup>10</sup> MN-S is recognized, under the 2019 *Métis Government Recognition and Self-Government Agreement between Métis Nation – Saskatchewan and Canada*, as representing the Métis of Saskatchewan. MN-S Locals exist under, and in accordance with, the *Constitution of the Métis Nation – Saskatchewan*.

<sup>11</sup> MN-S notes that some of the events still need to happen

<sup>12</sup> <http://nuclearsafety.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc3-2-2-ver1.1/index.cfm>

5. Provide a long-term mechanism for engagement and participation: Require Cameco to negotiate an MN-S-Cameco Collaboration and Engagement Agreement with emphasis on engagement efforts through post decommissioning and monitoring. The agreement would include future engagement expectations as well as monitoring and data collection needs (see next), rehabilitation during decommissioning and consideration for socio-economic interests of the Métis.

Target date: Completion of engagement agreement by December 31, 2021.

### **Eastern Athabasca Regional Monitoring Program (Section 4.3)**

The MN-S is aware that during the original licencing process for this mine, Cameco relied on 18-years of environmental monitoring data and information from the Athabasca Working Group (AWG) Environmental Monitoring Program. The MN-S notes that the filing record does not disclose any active involvement by the Métis in the review of key environmental characteristics such as climate and air quality, surface hydrology, surface water quality, groundwater quality, treated water quality, terrestrial ecology, and aquatic ecology. The filing record also does not disclose Métis active involvement in, or contributions to, the historical trends, benchmarks (e.g.: regulatory guidelines or limits), reference data, background conditions or predictions that were used in the original licencing process. The lack of Métis involvement seems to be inconsistent with Cameco's expressed interest in engagement efforts and its commitment to understanding how treaty or Indigenous rights might be affected and accommodated.<sup>13</sup>.

As already introduced, the MN-S has interests in the region that have been articulated within the *Métis Government Recognition and Self-Government Agreement between Métis Nation – Saskatchewan and Canada* and are relevant to the resolution of the Northwest Land Claim, which interests include:

- Water and subsurface rights
- Wildlife, Fishing and Fisheries
- Forests
- Protected areas, and
- Land management

These topics are of critical importance to protecting the Homeland and advancing the interests of Saskatchewan Métis within their Homeland.

### Recommendations

The MN-S recommends the following in relation to its s.35 interests and rights in the region:

6. Provide a long-term mechanism for MN-S involvement in monitoring: Require Cameco to work with MN-S to identify processes for involving the MN-S in monitoring programs, which involvement may be best set out in a MN-S-Cameco Collaboration and Engagement Agreement as described above, to allow MN-S to ensure the long-term health of the biophysical environment within their Homeland is maintained.

Target date: Completion of engagement agreement by December 31, 2021

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<sup>13</sup> [Aboriginal Peoples Engagement - Supportive Communities - Cameco - 2014 Sustainable Development Report](#)

7. Métis Traditional Land Use Study (“MTUS”): Require the completion of a Métis specific traditional and present-day use studies in Northern Regions #1 and #3 within the next five years, and to ensure that this information informs the update of the decommissioning plan. Require Cameco to support this effort.

Target date: Completion of MTUS by January 2025

#### 5. Community Based Environmental Monitoring (Section 4.4)

The MN-S notes the traditional food studies that Cameco has completed with the certain First Nations. The Métis in northern Saskatchewan were not part of the survey and Métis harvesting practices were not documented. As well, the MN-S is not represented on the Community Based Environmental Monitoring Committee. Similar to its comments under Eastern Athabasca Regional Monitoring Program (Section 4.3) above, the MN-S is looking for a long-term relationship with Cameco in advance of the project transitioning into decommissioning. The MN-S wants to ensure that Métis and Cameco have the information they need through the remaining operations and through closure. The Métis will live with the long-term legacy of the mining operations on their members, communities, and on their Aboriginal rights, including in respect of the Northwest Land Claim.

#### Recommendations

The MN-S recommends the following consistent with its Reconciliation and s. 35 interests in the area:

8. Provide a long-term mechanism for MN-S involvement in monitoring: Require Cameco to establish, in collaboration with MN-S, a Métis specific Community Based Environmental Monitoring Committee that advises Cameco during remaining operations and in decommissioning planning. Linked to MN-S-Cameco Collaboration and Engagement Agreement  
Target date: Completion of arrangements by December 31, 2021
9. Traditional food study: Require Cameco to support MN-S in completing a Métis specific traditional food study. Linked to MTUS  
Target date: Completion of MTUS by January 2025
10. Monitoring and Indicators: Require Cameco to involve Métis in monitoring through collaboration with MN-S and develop Métis specific performance indicators as part of SHEQ management programs and ESG reporting. Linked to MN-S-Cameco Collaboration and Engagement Agreement  
Target date: Completion of December 31, 2021

*In 2019, the CBEMP completed a traditional food study within the community of Fond du Lac Denesuline First Nation (Fond du Lac). Traditional meat that was predominantly harvested included barren ground caribou (meat and organs), moose, and snowshoe hare. More than half of the total meat consumption was from barren-ground caribou. The most common fish species consumed were lake whitefish, lake trout, northern pike, walleye, and suckers. The most frequently consumed birds were spruce grouse and ptarmigan as well as mallard duck for migratory birds. The most common berry types consumed were blueberry, bog cranberry and raspberry. The consumption frequency and quantities reported were generally consistent with other First Nations communities surveyed within Canada and similar to other First Nations in northern Saskatchewan (pg. 46, Community Based Environmental Monitoring Program)*

## 6. Decommissioning and Financial Guarantees (Section 4.6)

The MN-S understands that Cameco is required to update its decommissioning plan at regular 5-year intervals.<sup>14</sup> As Métis will be living with the decommissioned site and its effects on individual Métis, Métis communities, and Métis rights, including asserted Aboriginal title, the MN-S has an interest in decommissioning plans and the post-decommissioning period, especially related to aspects of environmental monitoring. It is MN-S understanding that Cameco has several long-term objectives for the decommissioned site:

- allow for continuing use for traditional practices
- support transition of Indigenous communities in identifying opportunities<sup>15</sup> during the cessation of operations

The review of the *Preliminary Decommissioning Plan - Cigar Lake Operation* did not provide an indication of anticipated engagement or whether engagement was part of the development of the current preliminary decommissioning plan. Given the need to update the plan, and that the objectives on record will affect Métis, the MN-S expects an extensive engagement program and expects to participate.

### Recommendations

The MN-S recommends the following. These recommendations are consistent with its UNDRIP (esp. Article 29), Reconciliation, and s. 35 Aboriginal rights and interests in the area. Article 29 speaks to Indigenous peoples having the *right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources* including ensuring that the “state” takes *effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent.*<sup>16</sup>

11. Métis Traditional Land Use Study (MTUS): Require Cameco to support documentation of Métis traditional use knowledge and use this knowledge towards achieving the stated goal for continuing use of the area<sup>17</sup>

Target date: Completion of MTUS by January 2025

12. Participation in decommissioning: Require Cameco to involve the MN-S in decommissioning planning and capture this in the proposed MN-S-Cameco Collaboration and Engagement Agreement

Target date: Completion of December 31, 2021

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<sup>14</sup> [https://s3-us-west-2.amazonaws.com/assets-us-west-2/technical-report/PDP\\_Summary\\_Cigar\\_Lake.pdf](https://s3-us-west-2.amazonaws.com/assets-us-west-2/technical-report/PDP_Summary_Cigar_Lake.pdf)

<sup>15</sup> [Aboriginal Peoples Engagement - Supportive Communities - Cameco - 2014 Sustainable Development Report](#)

<sup>16</sup> [https://www.un.org/esa/socdev/unpfii/documents/DRIPS\\_en.pdf](https://www.un.org/esa/socdev/unpfii/documents/DRIPS_en.pdf)

<sup>17</sup> <https://www.cameco.com/businesses/uranium-operations/canada/cigar-lake/licence-renewal>

13. Participation in economic opportunities planning: Require Cameco to support economic opportunity transition discussions since pivoting can take several years and the MN-S wants to avoid a boom-bust cycle for its members

Target date: Completion by December 31, 2022

14. Provide a long-term mechanism for MN-S involvement in monitoring: Require Cameco to involve the MN-S in a manner consistent with the engagement of the AWG and Community Based Environmental Monitoring committees, so that Métis are fully aware of operating practices (see Safety and Control Areas above) and can use this knowledge as part of decommissioning planning.

Target date: Completion of arrangements by December 31, 2021