



**Oral presentation**

**Exposé oral**

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

**Mémoire de la  
Nation métisse de la Saskatchewan**

In the Matter of the

À l'égard de

**Cameco Corporation, Beaverlodge Project**

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**Cameco Corporation, Projet Beaverlodge**

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**Application to amend its licence to allow  
release of 18 Beaverlodge Project  
properties from CNSC licensing**

**Demande de modification du permis de  
Cameco visant à retirer 18 propriétés du  
projet Beaverlodge du contrôle de la CCSN**

**Commission Public Hearing**

**Audience publique de la Commission**

**March 24, 2022**

**24 mars 2022**



February 7, 2022

Canadian Nuclear Safety Commission  
280 Slater Street, P.O. Box 1046, Station B Ottawa, ON K1P 5S9

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

To the Canadian Nuclear Safety Commission,

**Re: Request for release of 18 Beaverlodge properties from requiring licensing under the Nuclear Safety and Control Act: Written Intervention from the Métis Nation of Saskatchewan (CMD: CMD 22-H5)**

This written submission is a response to the request for the release of 18 Beaverlodge properties submitted by Cameco. For clarity, the Métis Nation – Saskatchewan, or “MN-S” has reviewed the documents and information provided by the CNSC. To begin, we would like to acknowledge that the land considered in this request for property release is the traditional and current territory and Homeland of the Métis (the “Homeland”). It is the future interests of the area that shaped the comments in this submission.

Before proceeding, the MN-S wishes to acknowledge that the CNSC provided information and financial support. That support makes it possible for the MN-S to provide this input.

The sections below provide background, principles, and recommendations. Overall, MN-S has concerns about the transfer of properties to institutional control and has provided recommendations to address identified issues. MN-S supports continued rehabilitation work and improved monitoring prior to the transfer of lands to the Institutional Control Program (ICP), as described in *Post Closure Management of Decommissioned Mine/Mill Properties Located on Crown Land in Saskatchewan (Institutional Control Program)*.<sup>1</sup> MN-S has made recommendations to support the completion of this phase.

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<sup>1</sup> <https://publications.saskatchewan.ca/api/v1/products/84331/formats/119330/download>



## Background

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.

## Review Principles

- **United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)**  
The MN-S endorses the importance of UNDRIP especially the importance of understanding free, prior and informed consent (FPIC), and with respect to this review is interested in how the release of properties might affect its Homeland.
- **Reconciliation**  
In 2015, the Truth and Reconciliation Commission of Canada issued its 94 Calls to Action among which were recommendations for reconciliation with the mining industry. Specifically, the MN-S looked at opportunities to promote reconciliation through the recommendations during this license amendment.
- **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 gather animals, plants, and materials for personal, social, ceremonial and trade purposes, rights to self-government, and rights to land (i.e., Aboriginal title). The review includes consideration of Métis rights and title.
- **Consultation and Engagement**  
The MN-S values consultation and engagement in activities that will have a long-term effect on their interests. This review took into account where MN-S can remain involved and/or needs to be involved going forward such as opportunities for MN-S to support improvement in the inclusion of Métis Knowledge and in supporting the dissemination of information to the Métis community.
- **Specified conditions for acceptance to the institutional control program**  
The specific requirements of interest to the MN-S are monitoring and maintenance plans once the lands have been transferred and whether MN-S interests can be satisfied.



## Recommendation Summary

The evaluations covered in the attached report focus on three topics: engineering safety and security, landscape-level assessment, and engagement. Based on these evaluations, recommendations have been made for mitigation and monitoring as well as engagement.

The following is a summary of the recommendations from the report's technical reviews. They are all forward-looking towards protecting Métis rights and title and maintaining an ongoing relationship with the MN-S.

### *Monitoring and Mitigation*

1. Include MN-S in the implementation of long-term monitoring of areas of potential crown pillar instability where a “reasonable worst-case scenario” of crown pillar collapse coupled with a worst-case scenario of limited crown pillar thickness would result in surface subsidence and potential fall hazard. This would presumably apply to all areas where the crown pillar thickness is poorly understood or known to be less than about 20 m thick. It is recognized that many of these crown pillars are in areas that are remote and potentially challenging to access; however, they may be good candidates for remote monitoring, such as air photos, LiDAR, and satellite imagery coupled with automated digital analysis to monitor.
2. Provide better communications regarding risks any time there has been a commitment in Cameco's submission to monitor for human activity in areas that have employed risk-based assumptions (such as areas of elevated gamma radiation). This can include signage and meetings with MN-S, Métis, and potential users in the spirit of informed consent.
3. Include MN-S in the monitoring of all hazards with residual risks and a reasonable worst-case scenario that would pose a risk to human health and safety. Monitoring should be in perpetuity and additional consideration should be given to effectively relating risks to potential end-users and providing appropriate signage on site.
4. Develop remote monitoring means given accessibility issues and the expense of supporting “boots on the ground”. For example, surface disturbance could be detected by a combination of LiDAR, air photo, and satellite imagery. Additionally, health of vegetation (and indications of stress) could be monitored using multi-spectral satellite imagery. Include MN-S in remote monitoring.
5. Provide a framework for an adaptive monitoring plan and contingency how this will be implemented post-COVID restrictions re. “benefits and importance of meaningful and physical interaction with the lands”.



6. Provide MN-S with control of the Métis Land Use (MLU) assessment to include mapping, description of sensitivities, opportunities, and expected outcomes. This would maintain confidentiality over aspects that community members may be unwilling to share publicly but retain the ability to flag possible conflicts and create a dialogue for resolution.
7. Include Métis monitors in monitoring work.

### *Engagement*

1. Revise policy, in collaboration with MN-S, to support informed consent and identifying gamma radiation “hot spots”. These have been “risky away” based on land use assumption. No obvious consideration of possible bioaccumulation of CoCs in plants and specifically traditional medicinal species. CNSC also indicated “no signage” to flag hot spots. This approach is inconsistent with informed consent.
2. Develop a communication strategy to ensure that a formal commitment or mechanism for engagement re: updates, maintenance and monitoring and reporting back to MN-S occurs. Mapping should be developed specific to MLU to include existing vegetation, the areas of risk and especially hotspots being monitored and their relationship to one another and land uses.
3. Provide MN-S with technical information for evaluation and dissemination to Métis communities as soon as information can be made available.
4. Provide MN-S with funding to support evaluation work and dissemination. Engage early on funding requirements.
5. Engage MN-S in discussions to support the inclusion of Métis Knowledge within the evaluation of future properties.



In closing, the MN-S has identified concerns with Cameco's proposal to transfer properties to institutional control. Recommendations align with engaging MN-S in continued rehabilitation and monitoring prior to approving the release of the properties to the ICP. MN-S is looking into the future to ensure lands are adequately safe and secure and suitable for Métis use. Engagement with MN-S can provide the information required for this future.

Sincerely,



Mark Calette  
Senior Director Lands and Consultation  
Métis Nation - Saskatchewan

*Attach. RE: Beaverlodge Licence Amendment Application: Written Intervention from the Métis Nation of Saskatchewan (CMD: CMD 22-H5) - Beaverlodge Licence Amendment Application: Written Intervention from the Métis Nation of Saskatchewan (CMD: CMD 22-H5)*





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[info@twoworldsconsulting.com](mailto:info@twoworldsconsulting.com)

 (778) 400-3499

[www.twoworldsconsulting.com](http://www.twoworldsconsulting.com)

February 7, 2022

**RE: Beaverlodge Licence Amendment Application:  
Written Intervention from the Métis Nation of Saskatchewan (CMD: CMD 22-H5)**

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The enclosed report is part of the Métis Nation of Saskatchewan's (MN-S) written intervention to the Canadian Nuclear Safety Commission (CNSC) for Cameco's Beaverlodge licence amendment application.

Based on the evidence gathered from technical reviews, important recommendations have been made.

If there are questions about this content, please feel free to contact the Project Manager, Hillary Ashley, at (778) 400-3679 or via e-mail at [hashley@twoworldsconsulting.com](mailto:hashley@twoworldsconsulting.com).

Sincerely,

Two Worlds Consulting Ltd.

Heidi Klein, MES, BSc  
Human and Community Well-being Lead

**Beaverlodge Licence Amendment Application:  
Written Intervention from the Métis Nation of Saskatchewan (CMD: CMD 22-H5)**

TWC has undertaken a review of the Beaverlodge Licence Amendment Application. It is understood that Cameco is seeking an amendment to their Beaverlodge licence. The amendment would release 18 Beaverlodge properties from the Beaverlodge waste facility operating licence. The release of properties will support transferring the properties to Provincial stewardship under Saskatchewan's Institutional Control Program (ICP).

Beaverlodge is a historic project. The operations closed in 1982. Decommissioning was completed in 1985. Cameco has been conducting monitoring and work to support the transfer of sites to the ICP. This review aims to ensure the properties are safe, secure, and suitable for use by Métis located in the Northern Region 1 ("NR1").

It is understood that Métis members and communities will be living with the legacy of these properties. To evaluate the application's legacy, this technical report is organized into three topic areas: engineering safety and security, landscape-level assessment, and engagement. TWC based its review and recommendations on the following MN-S principles and conditions.

- **United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)**  
The MN-S endorses the importance of UNDRIP especially the importance of understanding free, prior and informed consent (FPIC), and with respect to this review is interested in how the release of properties might affect its Homeland.
- **Reconciliation**  
In 2015, the Truth and Reconciliation Commission of Canada issued its 94 Calls to Action among which were recommendations for reconciliation with the mining industry. Specifically, the MN-S looked at opportunities to promote reconciliation through the recommendations during this license amendment.
- **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 gather animals, plants, and materials for personal, social, ceremonial, and trade purposes, rights to self-government, and rights to land (i.e., Aboriginal title). The review includes consideration of Métis rights and title.
- **Consultation and Engagement**  
The MN-S values consultation and engagement in activities that will have a long-term effect on their interests. This review took into account where MN-S can remain involved and/or needs to be involved going forward such as opportunities for MN-S to support improvement in the inclusion of Métis Knowledge and in supporting the dissemination of information to the Métis community.



- **Specified Conditions for Acceptance to the Institutional Control Program**

The specific requirements of interest to the MN-S are monitoring and maintenance plans once the lands have been transferred and whether MN-S interests can be satisfied.

### **Documents Reviewed**

Documents from the current licencing request were considered. In addition, the review considered reference documents for a previously approved release request of 20 properties. Documents were also identified for gaps in the landscape review but were unavailable. The documents considered in the preparation of this review and those that were unavailable are listed below.

### Current Licencing Amendment Request

#### *Hearing documents:*

1. The December 3<sup>rd</sup>, 2021 Commission Hearing Document – Request for release of 18 Beaverlodge properties from requiring licencing under the Nuclear Safety and Control Act
  - current licence WFOL-W5-2120.1/2023
  - proposed licence amendment
  - proposed draft licence WFOL-W5-2120.2/2023
  - proposed draft licence conditions handbook
2. The December 8<sup>th</sup>, 2021 Commission Hearing Document – Written submission from Cameco Corporation

#### *Closure document:*

3. Final Closure Report, Beaverlodge Properties ACE 1, ACE 3, ACE 7, ACE 8, ACE 9, ACE 14, ACE MC, EXC ACE 15, EXC URA 7, GC 2, NW 3 Ext, NW 3, URA FR, EMAR 1, EXC 1, HAB 1, and HAB 2. Kingsmere Resource Services Inc., January 2021 (e-Doc 6468525, response to review comments provided in **e-Doc 6542932**).
4. CMD 14-M60. Commission Request for Information, Cameco Corporation, The Decommissioned Beaverlodge Mine and Mill Site, Public Meeting October 1, 2014, Submitted by CNSC staff (e-Doc 4438227).

Previous Request for Release of 20 Properties

*Hearing documents:*

5. The July 24<sup>th</sup>, 2019 Commission Hearing Document – Request for Release of 20 Beaverlodge Properties from Requiring Licensing under the Nuclear Safety and Control Act
  - current licence WFOL-W5-2120.0/2023;
  - proposed amended licence WFOL-W5-2120.1/2023; and
  - draft Licence Conditions Handbook.
6. The December 19<sup>th</sup> 2019, Commission Record of Decision Document - Request for Release of 20 Beaverlodge Properties from Requiring Licensing under the Nuclear Safety and Control Act

*Closure document see comment for description from hearing licence:*

7. Final Closure Report, Beaverlodge Properties HAB 3, HAB 6, EXC 2 RA6, RA 9, EAGLE 1, BOLGER 2, ATO 26, EXC ATO 26, URA MC, EXC ACE 1, ACE 10, ACE 2 & EXC ACE 3, Kingsmere Resource Services Inc., March 2016 (**e-Doc 4977527**).
8. Final Closure Report – Addendum 1, Beaverlodge Properties HAB 3, HAB 6, EXC 2 RA6, RA 9, EAGLE 1, BOLGER 2, ATO 26, EXC ATO 26, URA MC, EXC ACE 1, ACE 10, ACE 2 & EXC ACE 3, Cameco Corporation, August 2016 (**e-Doc 5058744**).
9. Final Closure Report – Addendum 2, Beaverlodge Properties HAB 3, HAB 6, EXC 2 RA6, RA 9, EAGLE 1, BOLGER 2, ATO 26, EXC ATO 26, URA MC, EXC ACE 1, ACE 10, ACE 2 & EXC ACE 3, Cameco Corporation, November 2016 (**e-Doc 5119033**).
10. Final Closure Report, Beaverlodge Properties URA 3, URA 5, EXC URA 5, ACE 5, JO-NES, and HAB 2A, Kingsmere Resource Services Inc., March 2018 (**e-Doc 5501321**).

Materials not Available for Landscape Review

- Chapter 2 of *Decommissioning of the Beaverlodge Mine/Mill Operations and Reclamation of the Site, Report No. 2 Operating History and Environmental Conditions* (Eldorado 1983)
- Country Food Study initiated in May 2010, CanNorth and SENES 2012
- *Cameco 2012 Beaverlodge Mine Site path forward report. Prepared for Canadian Nuclear Safety Commission and Saskatchewan Ministry of Environment. Re remedial options and input wrt TLU*
- *242014 Uranium City Consultation on Land Use, prepared for Cameco Corporation and Saskatchewan Research Council, prepared by SENES Consultants and Kingsmere Resources Service, January 2015.*

## **1. Engineering Review**

The engineering technical review found that there are residual risks and a lack of supporting communication related to the residual risks. The recommendations focus on the role MN-S can provide in supporting improvements in relation to additional rehabilitation and monitoring in select areas.

### Technical Review

The reclamation work appears to have been completed to a high standard, consistent with good practice. Water quality monitoring suggests that observed water quality trends are stable/improving and consistent with modelled predictions.

The process has provided a high level of confidence in the reclamation elements for which agreed-upon performance indicators could be confirmed, verified, and/or certified by engineers. Remediated hazards that fall into this category include plugged boreholes; shafts that have been capped with approved/certified engineered covers; backfilled mine adits; removal of waste/garbage and past mining infrastructure, capping and revegetation of tailings and waste rock; and confirmation of suitably low residual gamma radiation through gamma surveys.

In general, the appropriateness of the approved reclamation process is uncontroversial where remediation success can be documented and quantified.

There appears; however, to be a slight disconnect with respect to the long-term management of hazards that retain residual hazards and/or areas that required additional risk assessment to justify why failure to meet performance indicators did not pose an undue risk to potential users of the remediated properties.

### *Residual Risks*

These residual risks associated with physical hazards can be conceptualized as falling into three broad categories:

- 1) Reclaimed areas that did not unequivocally meet agreed-upon reclamation standards (such as gamma radiation localized “hot spots”) and where risk assessment methods are subsequently employed to demonstrate that local areas of exceedance do not pose a risk to human health and safety for the modelled usage scenarios.
  - Supplemental risk assessment assumed that users would have limited exposure (i.e., less than 50 hours of exposure per year) and were used to justify the suitability of existing reclamation condition (i.e., justify no requirement for additional reclamation or monitoring).
- 2) Areas where approved remediation protocols (such as capping of tailings and waste rock) were not implemented because the areas are inaccessible or impractical to access. In these cases, it was argued the modest improvement in risk reduction did not justify the additional remediation effort required to implement the remediation strategy because this area will continue to be inaccessible in the future.

- 3) Areas overlying underground workings where potential crown pillar instability pose residual long-term risk of surface subsidence but where the risk is considered sufficiently low that no additional remediation or monitoring is recommended.
  - Most of the crown pillar assessment work appears to have been completed as a desk-top review with additional visual inspection to confirm no obvious surficial expression. In many instances, the crown pillar thickness is estimated based on incomplete mining records with no additional drilling investigations to support stability assessment.
  - The 2013 crown pillar collapse and surface subsidence over the Ace MC Stope area provides a clear reminder that crown pillars are at risk of failure and the risk only increases as more time passes.

#### *Residual Risk Communication*

The 2019 Record of decision (DEC 19-H6), submitted on December 19, 2019, acknowledged that some properties were deemed safe for casual access. It provides insight regarding a desire to **not** flag areas of residual risk. In part arguing that it could cause fear and dissuade locals from using the lands or harvesting country foods – which would be a net harm relative to any risks posed by the residual risks. Specifically:

- Paragraph 118 indicates the Province’s preference that no signage be included, and
- Paragraph 119 indicates that their assessment concluded that the properties were safe for casual access, traditional activities, and recreational uses but were **not** suitable for residential, commercial, or industrial development. Administrative controls would be put in place but not communicated to local users or MN-S.

There appears to be no commitment to communicate increased residual risks (and arguably elevated risk) to end-users. Future users would not even have the benefit of signage to indicate areas that may be less suitable for traditional land usage and recreation.

#### Recommendations:

Based on the information provided in the technical review of the Beaverlodge application, the following recommendations are made below.

1. Include MN-S in the implementation of long-term monitoring of areas of potential crown pillar instability where a “reasonable worst-case scenario” of crown pillar collapse coupled with a worst-case scenario of limited crown pillar thickness would result in surface subsidence and potential fall hazard. This would presumably apply to all areas where the crown pillar thickness is poorly understood or known to be less than about 20 m thick. It is recognized that many of these crown pillars are in areas that are remote and potentially challenging to access; however, they may be good candidates for remote monitoring, such as air photos, LiDAR, and satellite imagery coupled with automated digital analysis to monitor.
2. Any time there has been a commitment in Cameco’s submission to monitor for human activity in areas that have employed risk-based assumptions (such as areas of elevated gamma radiation) give additional consideration to better communicating the risks (e.g., signage and dialogue with MN-S, Métis and potential users) in the spirit of informed consent.

3. Include MN-S in the monitoring of all hazards with residual risks and a reasonable worst-case scenario that would pose a risk to human health and safety. Monitoring should be in perpetuity and additional consideration should be given to effectively relating risks to potential end-users and providing appropriate signage on site.
4. Given site accessibility issues and the expense of supporting “boots on the ground” monitoring, give consideration to developing remote monitoring. For example, surface disturbance could be detected by a combination of LiDAR, air photo, and satellite imagery. Additionally, health of vegetation (and indications of stress) could be monitored using multi-spectral satellite imagery. Include MN-S in remote monitoring.
5. Gamma Radiation surveys flagged some “hot spots” that were “risked away” based on land use assumption. No obvious consideration was given to possible bioaccumulation of CoCs in plants and specifically traditional medicinal species. CNSC also indicated “no signage” to flag hot spots. Policy is inconsistent with informed consent. Revise policy in collaboration with MN-S to support informed consent.

## **2. Landscape review**

The landscape review found that there are residual risks and a lack of supporting communication. Recommendations focus on the role MN-S can provide in supporting improvements.

### Technical Review

The purpose of the review from a landscape perspective is to recognize land use by Métis and how the remedial measures are suitable for wildlife, vegetation, fish, and future harvesting use by Métis. The closure plan did not recognize these Métis Land Uses (MLU) as an objective. Iterations of objective setting for the properties continually improved the outcomes, focussing on “safe, secure, and stable/improving” key potential hazards, and in this regard the outcomes meet the technical standards. Reporting lacks a commitment to restore the lands to a condition that is consistent with MLU and harvesting of traditional country foods as a whole, and also the evolving context of recent climate changes and an expanding return to land values and teaching of youth. The reports imply that with recovery, restoration of MLU will occur, however since it is not an objective, this assumption is not being tested and/or monitored.

The review identified seven themes for consideration:

#### **1. Data Gaps in Review Materials**

The review could have benefited from Métis input reporting preference re “wildlife, vegetation, fish, and future harvesting use by Métis”. Reports regarding country foods have been compiled but were not available at the time of this report that could have served as surrogates. A number of reports that could fill this gap are listed in the documents reviewed section. A good baseline vegetation map would also have assisted to characterize the relative importance of peat accumulating wetlands to uplands as input to future monitoring.

#### **2. Performance Indicators and assumptions**

These indicators were chosen to meet technical requirements, and the “safe, secure, and stable/improving” framework is a good one. However, the indicators and the research that led to them

were not verified by Métis. They do not include expectations for suitable wildlife, vegetation, fish, and future harvesting but rely on natural regeneration. In and of itself, this is not unreasonable, however, a review of aerial photography shows a marked lack of revegetation on waste rock sites over 40 years. The indicators seem to focus on the secure aspect of stabilization through vegetation, and not on whether vegetation cover needed to be qualified to species of use to the Métis.

The assumptions for water quality performance do not appear to include the potential for climate change and radiation to modify releases of Selenium and the response of vegetation and wildlife. There is no mention of the potential for bioaccumulation or impediments to seed germination, but the risk assessment should have considered these effects. Nevertheless, these factors are not being monitored.

Terrain has presented an impediment to covering of tailings, and a decision was made to leave recovering vegetation in place. It is a reasonable approach that deals with the immobilization of sediments but does not prevent contact with low-level radiation. In terms of ongoing and possibly expanding Métis use, these areas should be mapped (current mapping is ambiguous) and the specific risks to users communicated. There are caveats on the use, and the risks should be more clearly delineated and monitored. Better communication and the opportunity to discuss community tolerance and needs, including the potential for new land-use planning should be provided.

### 3. Institutional/Administrative Controls

No land-use change is an assumption used to avoid dosages over acceptable limits. There does not seem to be a mechanism to ensure communication to future users including Métis. Signage was actually discouraged in the 2019 application as it was thought that it would discourage the use of the area. There needs to be assurance that the assumptions have not changed through time and informed agreement with the uses.

### 4. Communication

There are numerous references to the need for improved engagement with Métis and reporting back to the Commission. It is understood that field events since 2020 have been compromised due to COVID, however, there does not appear to be a formal commitment or mechanism for engagement re: updates, maintenance, monitoring, and reporting back to Métis.

Engagement with respect to use of the land needs to be expanded and criteria re-examined. For instance, Watson Lake and Beaverlodge Lake were assessed as low use, but if the perception of the community is that it is unhealthy, the information ignores the aspirational use by the community and should not be used to discount the importance of monitoring and ongoing evaluation since the risk however low does exist.

### 5. Commitments to Monitoring

They are not focused on the MLU, but rather on narrow indicators used to support technical engineering objectives. In previous documents, the sections on Monitoring and IC Maintenance are either missing or redacted, and do not provide a comprehensive framework that details indicators, performance thresholds, and determination of success. Such detail may be beyond the scope of the remedial project and technically sufficient information has been provided on a property-by-property basis. There is

potential for remote imaging to assist with evaluation of recovery efforts and vegetation effects due to climate change.

The timeframes suggested should be reconsidered as to whether they would detect change, given the rate of change due to climate effects.

#### 6. MS-N Opportunities

The review has identified areas where MS-N should be in control of the studies to improve the connection between remediation of mine sites and restoration of MLU. Métis could provide original research in response to the promise by the Commission for further engagement doubting that the existing land-use study was inclusive. This original research could suggest reclamation planning specifically in the context of MLU, taking a landscape approach to ensure the cumulative effects are considered, including temporal effects.

The development of a Monitoring Framework with indicators and performance measures that reflect MLU is another opportunity for original research and ownership by MS-N.

#### *Recommendations*

1. Develop a communication strategy to ensure that a formal commitment or mechanism for engagement re: updates, maintenance and monitoring, and reporting back to MN-S occurs. Mapping should be developed specific to MLU to include existing vegetation, the areas of risk, and especially hotspots being monitored and their relationship to one another and land uses.
2. Provide a framework for an adaptive monitoring plan and contingency how this will be implemented post-COVID restrictions re “benefits and importance of meaningful and physical interaction with the lands”.
3. Provide MN-S with control of the MLU assessment to include mapping, description of sensitivities, opportunities, and expected outcomes. This would maintain confidentiality over aspects that community members may be unwilling to share publicly but retain the ability to flag possible conflicts and create a dialogue for resolution.

#### **3. Engagement:**

This section investigates recent engagement activities. This builds on the engagement concerns and recommendations that have already been presented in previous sections.

#### Technical Review

MN-S participated in the hearing for the 2019 release of properties. MN-S recommended tours occur to support Métis understanding of the site. The commission agreed with increasing ‘boots on the ground’ tours where meaningful exchanges with Elders and Cameco could occur. Additionally, MN-S raised the issue

of employment for local Indigenous peoples. Cameco provided examples in which they were offering employment to locals in Uranium City.<sup>1</sup>

Engagement on the current request for transfer of properties has included engagement with:

- MN-S Local #50 President;
- the Métis people in the vicinity of the decommissioned Beaverlodge properties;
- Stony Rapids Métis Local #80 and #79 President; and,
- MN-S.<sup>2</sup>

The CNSC specifically identified Métis in Northern region 1 for engagement (i.e., Northern Region 1: Métis Local #50 – Uranium City & Métis Local #80 – Stony Rapids).<sup>3</sup> Cameco indicates that they also directly engaged with the Stony Rapids Métis Local #80 and #79 President.<sup>4</sup>

MN-S was invited to Cameco's annual public meetings in 2020 and 2021. Meetings are also attended by regulators (i.e., CNSC staff, Saskatchewan Ministry of Environment, and Saskatchewan Ministry of Energy & Resources) and include their presentations of the regulatory process for the decommissioned Beaverlodge properties. Environmental risk assessment information was presented in 2020. The focus was on the safety of the area's country foods when water and fish advisories are respected. Information on water quality was also covered.<sup>5</sup>

To adapt to pandemic restrictions drone footage has been made available in 2020 and 2021. This also supported viewing difficult to access areas. MN-S Local #50 President was listed as an attendee of a 'boots on the ground' tour of decommission Beaverlodge properties. The in-person tour was limited to locals to consider pandemic safety.<sup>6</sup>

The hearing documents support that engagement activities for this licence amendment application have not resulted in concerns being expressed for the 18 properties.<sup>7</sup>

MN-S has been engaging with CNCS on this licence amendment application. During a meeting with MN-S and Cameco to discuss the current property transfer the value of gathering input from Elders on the land, vegetation, and wildlife was highlighted. Evaluation of the land from a Métis perspective would be supported by the inclusion of Métis within monitoring programs.

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<sup>1</sup> The December 19th 2019, Commission Record of Decision Document - Request for Release of 20 Beaverlodge Properties from Requiring Licensing under the Nuclear Safety and Control Act

<sup>2</sup> The December 8th, 2021 Commission Hearing Document – Written submission from Cameco Corporation

<sup>3</sup> The December 3rd, 2021 Commission Hearing Document – Request for release of 18 Beaverlodge properties from requiring licensing under the Nuclear Safety and Control Act

<sup>4</sup> The December 8th, 2021 Commission Hearing Document – Written submission from Cameco Corporation

<sup>5</sup> The December 8th, 2021 Commission Hearing Document – Written submission from Cameco Corporation

<sup>6</sup> The December 8th, 2021 Commission Hearing Document – Written submission from Cameco Corporation

<sup>7</sup> The December 8th, 2021 Commission Hearing Document – Written submission from Cameco Corporation, The December 3rd, 2021 Commission Hearing Document – Request for release of 18 Beaverlodge properties from requiring licensing under the Nuclear Safety and Control Act



MN-S also noted that there is an opportunity for local communities to receive technical support from MN-S during engagement activities on these projects. This would have clear value considering the record indicates that no concerns have been raised previously, however several concerns have been identified in this report.

MN-S understands that properties have been transferred according to a risk gradient. The lowest risk properties have been considered first and the highest risk such as those including tailings management has not been considered yet. The provision of technical support by MN-S will be especially important for properties with higher risks.

*Recommendations:*

Based on the information provided in the technical review of the Beaverlodge application, the following recommendations are made below.

1. Provide MN-S with technical information for evaluation and dissemination to Métis communities as soon as information can be made available.
2. Provide MN-S with funding to support evaluation work and dissemination. Engage early on funding requirements.
3. Engage MN-S in discussions to support the inclusion of Métis Knowledge within the evaluation of future properties.
4. Include Métis in monitoring work and support inclusion of Métis Knowledge.