



Oral presentation

Exposé oral

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

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

In the Matter of the

À l'égard de

Cameco Corporation, Beaverlodge Project

Cameco Corporation, Projet Beaverlodge

**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 3, 2022

Jerilyn Benonie
General Delivery
Wollaston Lake, SK
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Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046, Station B
Ottawa ON K1P 5S9
Email: cns.interventions.ccsn@canada.ca

Re: Intervention letter on amending the Beaverlodge Waste Facility Operating Licence to allow removal of 18 properties from CNSC licensing

Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am pleased to provide a written intervention for the upcoming hearing (March 23 to 24, 2022) regarding proposed amendments to the Beaverlodge Waste Facility Operating Licence that will allow for the removal of 18 properties from CNSC licensing.

The AJES is a subcommittee that flows from the 2016 collaboration agreement signed with the seven Athabasca Basin communities. AJES members are the primary liaisons between Cameco Corporation (Cameco), Orano Canada (Orano), the three Athabasca First Nations and four municipal 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. Appointed by leadership under the agreement, the community AJES representatives play an important role for the companies by providing advice, based on interest and need, regarding community engagement strategies. As a representative of the Athabasca communities and an active member of AJES, I believe it is important the subcommittee intervenes on the proposed amendment since we were the focus of engagement from Cameco for the decommissioned Beaverlodge properties.

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 from each of the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, Wollaston Lake)
- Executive Director of the Ya'thi Néné Lands and Resource Office

The Ya'thi Néné Lands and Resource Office was created under 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. The office provides technical support to AJES and has representation at quarterly meetings.

Prior to the implementation of the CA, Cameco maintained a long-standing relationship with the Athabasca communities. For over two decades, Cameco has engaged with Athabasca residents through subcommittees such as the Athabasca Working Group established under the 1999 Impact Management Agreement with the Athabasca Basin communities, the Northern Saskatchewan Environmental Quality Committee and through direct communication with community members and leadership.

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 was a big success, and since its initiation in 2000, routinely demonstrating that samples collected near the Athabasca communities, including Uranium City, are not influenced by the active uranium mining and milling activities conducted in the region.

Moving forward, the AJES has agreed with a change to the previous AWG monitoring program study design. Initiated in the winter of 2018, the CBEMP focuses on a single community area per year to conduct a dietary food survey and associated monitoring. The benefit of the CBEMP is that the communities will have a specific, focused study that reflects what they eat, how much they eat, and the general location of the food. Accompanying the dietary food survey will be a sampling program which will collect and test water, fish and wildlife samples from areas identified by community members.

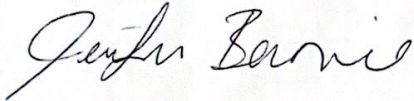
Also recognised by the AJES is the Eastern Athabasca Regional Monitoring Program (EARMP). AJES is aware that EARMP data has been used to help inform a Country Food Study that assessed potential human health risks associated with the consumption of country foods gathered in the Uranium City/Beaverlodge area by local residents. The study encouraged community engagement through interviews as well as through voluntary sample submission of wildlife or plants collected by community members. Results of this study also found that traditional harvesting of country foods do not present health risks to residents of Uranium City.

Community members are encouraged to bring forward any questions or concerns about the active or historic uranium operations and the environment to their community AJES representatives. The AJES members are regularly invited to the annual public meeting for the decommissioned Beaverlodge properties held in Uranium City, which includes a site tour of some of the properties and an opportunity for questions and concerns to continue to be brought forth and discussed. With the COVID-19 pandemic, Cameco adapted and hosted these annual meetings virtually but still provided an opportunity for those interested to connect with the land and tour the sites virtually.

We have been informed regarding ongoing or completed activities as well as the Institutional Control program and regulatory processes. During the 2021 public meeting, Cameco presented information regarding the 18 properties, subject to the upcoming hearing, and demonstrated that

they have met the established performance objectives of safe, secure and stable/improving as well as pose minimal risk to public safety or to the local environment. It is understood that Cameco intends to transfer 18 properties to the Institutional Control program and free-release portions based on the presence of historical mining/milling activities and we are in support of this application.

Sincerely,

A handwritten signature in cursive script that reads "Jerilyn Benonie".

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
Louise Bougie-Still, AJES – Athabasca Municipalities
Garrett Schmidt, AJES – Ya'thi Néné Lands and Resource Office
Glenn LaFleur, AJES – Orano
Kristin Cuddington, AJES – Cameco