



CMD 26-M3.12A
CMD 26-M5.19A
CMD 26-M7.10A

Date: 2026-03-04

Supplementary Information

Renseignements supplémentaires

Presentation from the Athabasca Chipewyan First Nation

Présentation de la Athabasca Chipewyan First Nation

In the matter of the

À l'égard du

**Regulatory Oversight Report for Uranium
Mines and Mills in Canada: 2024**

**Rapport de surveillance réglementaire
des mines et usines de concentration
d'uranium au Canada : 2024**

**Regulatory Oversight Report for
Canadian Nuclear Power Generating
Sites for 2024**

**Rapport de surveillance réglementaire
des sites de centrales nucléaires au
Canada : 2024**

**Regulatory Oversight Report for Uranium
and Nuclear Substance Processing
Facilities in Canada: 2024**

**Rapport de surveillance réglementaire
des installations de traitement de
l'uranium et des substances nucléaires
au Canada : 2024**

Commission Meeting

Réunion de la Commission

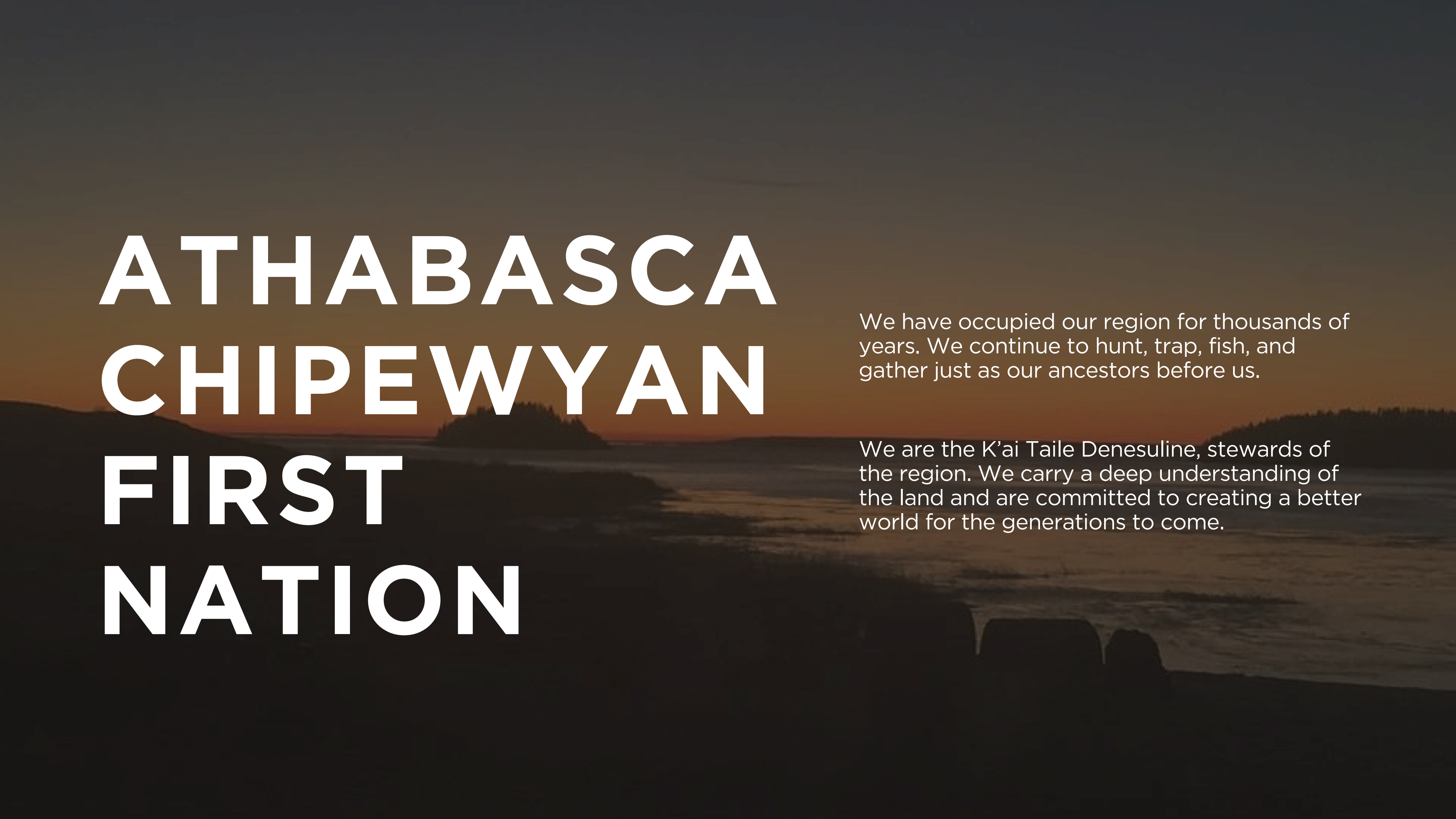
March 2026

Mars 2026

Athabasca Chipewyan First Nation

MARCH 2026
ROR2024
CNSC MEETING





ATHABASCA CHIPEWYAN FIRST NATION

We have occupied our region for thousands of years. We continue to hunt, trap, fish, and gather just as our ancestors before us.

We are the K'ai Taile Denesuline, stewards of the region. We carry a deep understanding of the land and are committed to creating a better world for the generations to come.

WHERE ARE WE?

OUR TRADITIONAL TERRITORY IS IN THE HEART OF THE BOREAL FOREST IN CANADA. WE HAVE OCCUPIED THIS LAND FOR THOUSANDS OF YEARS AND CONTINUE TO DO SO. WITHIN THAT LAND IS THE COMMUNITY OF FORT CHIPEWYAN, A COMMUNITY DIRECTLY DOWNSTREAM OF CANADA'S BIGGEST EXTRACTIVE OPERATIONS.



An aerial photograph of an oil sands mining operation. The landscape is heavily disturbed, with large, irregular pits filled with dark, viscous material. A network of dirt roads and tracks crisscrosses the area. Several large yellow mining trucks are visible, some parked and others in motion. The overall scene depicts a large-scale industrial extraction process.

ACFN STRESSORS

- OIL SANDS
- URANIUM
- HYDROELECTRIC DAMS
- RARE EARTH MINERALS

Past and Present

ACFN has proved to the commission the proponents and respective governments that we have significant Traditional Land Use in the area.

Including but not limited to:

- łuezán tué chogh (Carswell Lake), thai tué (Sandy Lake)
- łuezán túaze (Cluff Lake)
- Lake Athabasca on both sides of the Saskatchewan–Alberta border

Western methods have proved we have utilized this area of Treaty No. 8. In this area, our nation practices traditional activities that are vital to our nation's food security.

Including but not limited to:

- ceremonial practices,
- trapping,
- camping and living in cabins,
- travelling to important land use areas harvesting resources

TREATY RIGHTS AND UNDRIP

Our communities constitutionally protected treaty rights demand that both government and industry honourably engage with us to ensure industrial development does not meaningfully diminish the ability of our members to exercise their treaty rights on the land.

UNDRIP outlines a framework for fostering respectful and meaningful dialogue with indigenous communities, emphasizing principles such as free, prior, and informed consent (FPIC) and the recognition of indigenous peoples' inherent rights to self-determination and land stewardship.



CNSC Realtionship

- 2025 Signed a terms of reference with CNSC
- Ongoing quarterly meetings with Nations members and staff
- Utilize the Participant funding to review documents& attend meetings/ hearings
- Utilize the Grants
 - Capacity -employment & training
 - Research - TLUS



Impacts to ACFN



ACFN has endured this industry for far too long and historically had little to no engagement or consultation that is to our standards.

Currently:

- Over 25 active Uranium exploration permits in traditional territory
- 3 legacy mine clean up
- Properties moving into the Government of Saskatchewan program
- 2 proposed Uranium mines

ACFN Submission

ROR 2024 ACFN intervention report will focus on three Regulatory Oversight Reports 2024

1. Nuclear Power Generation sites
2. Uranium mines and Mills
3. Uranium and Nuclear substance Processing Facilities

Nuclear Power Generation site

ACFN is seeing new builds being proposed in
ACFN territory

- Understanding the current system
- Safeguarding ACFN-protected Treaty Rights
- Risk Identification

Generation site: Issues

- 1.No information on new plants included or how they will be addressed
- 2.Increase in non-compliance: Require a level system to be defined.
- 3.Indigenous Health and Knowledge are not included
- 4.Facility and waste storage are not adequate
- 5.exposure to workers
- 6.Defined level systems
- 7.Fish impingements
- 8.Indicent- release of liquid waste
- 9.use of public resources and safety protocols

Generation site: Reccomendations

1. Expanding on reports to include
 - a. Identity level system for spills, releases, and non-compliance
2. Trend analysis of non- compliance to identify common factors contributing to the increase
3. Inclusion of Indigenous health factors is a valued component to site preparation
4. Higher engagement and consultation expectations
5. Need for up sizing facilties to be accurate for accurate future planning
6. Better public and national protocols of exposure
7. Level system to understand human and environmental health impacts
8. More information on incidents from the release- current information is not helpful
9. Inclusion of public parties in planning
10. Consultation Process update and strengthening engagement with Nations for building relations and collaborative decision-making.

Uranium mines and Mills

4 THEMES

1. WORKERS RADIATION

2. SPILLS, RELEASES, AND ENVIRONMENTAL PROTECTION

3. RELIANCE ON AVERAGES AND GUIDLINE CAPARISONS

4. MONITORING PROGRAM

Mines & Mills

In ACFN's submission, the key concerns include, but are not limited to:

- Worker health
- Frequency of radiation level exceedance
- long-term cumulative impacts
- Indigenous health
- Treaty rights & duty to consult
- Classification of events
- Environmental health
- Monitoring
- Inspections

ACFN insists that these ROR be heavily expanded to include supporting data and definitions to the statements being made.

Uranium mines and Mills

Directly asked **16 questions** to CNSC to answer or clarify our findings.

ACFN expects direct responses from the CNSC to these issues and to provide information in future reports



Nuclear Substance processing Facilities

1. SPILL, RELEASE, ENVIRONMENTAL PROTECTION

- a. lack of reporting, ACFN not affected, but push for stronger communication with surrounding Nations

2. ANNUAL AVERAGES AND GUIDELINES

- a. into considering or connected to indigenous health values or public health modeling

3. MONITORING PROGRAMS

- a. "People & environment remained protected."
- b. gaps raised by Nations not addressed in ROR
- c. lack of information = lack of trust

Spills, Releases & Environmental Protection

“No lasting Impact”



Not included in assessment

Not included in the assessment

- Frequency and trends
- Mass and load
- Downstream transport and aquatic changes

The current system looks at these as isolated instances rather than as cumulative downstream impacts to health

Issue

**LACK OF DEFINED LEVELS OF EXPOSURE,
NON COMPLIANCE, HEALTH AND
UNSATISFACTORY REPORTS.**

Action and Statements

ACFN requests that the CNSC ensure that our written 7 oral submission is taken under consideration, and the actions and requests outlined today be addressed

CONCLUSION

Our people have occupied this land for generations and intend to continue to practice our Treaty Rights for generations to come

We will be continually reviewing the current status and risk in all Uranium development in this region and hope that these projects learn from past mistakes and oversight when it comes Indigenous Stewardship

ACFN will be available and will continue to be leaders in environmental protection for all those that seek it

Marsi Cho

FROM THE K'ÁI TAILÉ DENÉ

