



CMD 26-M3.6

Date: 2026-01-27

**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 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**

Commission Meeting

Réunion de la Commission

March 2026

Mars 2026

January 26, 2026

Senior Tribunal Officer
Canadian Nuclear Safety Commission
280 Slater Street
PO Box 1046 Stn B
Ottawa, ON K1P 5S9
Email: interventions@cnsccsn.cg.ca

Re: Intervention letter regarding the Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2024

Dear Senior Tribunal Officer:

The Athabasca Joint Engagement and Environment Sub-committee (AJES) is pleased to provide a letter regarding the 2024 Regulatory Oversight Report (ROR) for Uranium Mines and Mills in Canada.

The seven Athabasca Basin communities (Denesūliné First Nations of Black Lake, Fond du Lac, and Hatchet Lake and municipalities of Stony Rapids, Wollaston Lake Post, Uranium City and Camsell Portage) signed the Ya'thi Néné Collaboration Agreement with Cameco and Orano in 2016. The Agreement confirms the partnership between the First Nations, communities and industry in development of uranium resources in the Athabasca Basin relative to the existing operations. The Agreement builds on an Impact Management Agreement signed in 1999 and is structured on the five pillars of workforce development, business development, community investment, environmental stewardship and community engagement. It is implemented through the collective effort of the Joint Implementation Committee (JIC), Athabasca Joint Engagement and Environment Sub-Committee (AJES) and the Athabasca Community Trust (ACT).

Under the Collaboration Agreement the AJES was created and appointed as the primary liaison between Cameco, Orano and the Athabasca First Nations and Athabasca communities for the sharing of environmental information.

The Ya'thi Néné Lands and Resources Office (YNLR) was formed at the time the Ya'thi Néné Collaboration Agreement was signed and works to protect the lands and waters of the Athabasca Basin for the long-term benefits of its Denesūliné First Nations and Athabasca communities, guided by their knowledge, traditions, and ambitions. The YNLR is 100% owned by Athabasca Basin communities and governed by an independent Board of Directors appointed by elected community leaders. In addition to a variety of land- and resource-related initiatives, YNLR supports the implementation of the Collaboration Agreement.

The AJES serves as the first point of contact between communities, Cameco and Orano with respect to community engagement and environmental stewardship. As well, Cameco and Orano employ Community Relations Liaisons, who are community members from the three First Nations, whose role is to support the implementation of the Collaboration Agreement within the Athabasca Basin communities.

AJES members include one representative from each of the three First Nations (Black Lake, Hatchet Lake, and Fond du Lac), one representative that represents the four municipalities (Camsell Portage, Uranium City, Stony Rapids, and Wollaston Lake Post), and one representative each from Cameco, Orano and YNLR. To support the AJES, the Community Relations Liaisons also attend AJES meetings along with any other invited guests.

The AJES shares information regarding areas of interest specifically identified by community members and is an avenue for sharing information between companies, the AJES members and the communities. The AJES representatives and attendees are encouraged to bring forward any questions or concerns from community members and/or Leadership about Cameco and Orano's operations so that concerns can be addressed by company representatives. The committee also provides a channel for the communities to share traditional knowledge with the companies. As appointed community members, AJES representatives provide guidance on community engagement strategies for planned and future site-based projects.

Together with the Community Relations Liaisons, the AJES meets on a regular basis (a minimum of four times per year).

In 2024, the AJES met in February in Fond du Lac, in June in Saskatoon and met virtually in September and November. Cameco, Orano and YNLR each provided updates at these meetings. Committee members, along with YNLR staff and board members, also visited the Rabbit Lake Operation in September.

Operations of the currently active mines and mills are reviewed at each meeting with a focus on Rabbit Lake, Cigar Lake and McClean Lake. In addition, email notification of any significant environmental event is provided between meetings and discussed at the regular meeting; thus, AJES receives notices of incidents prior to notification from the CNSC's ROR.

In 2024, the committee reviewed Orano's Valued Ecosystem Components to be used in the McClean Lake Environmental Risk Assessment in 2025, the Tailings Optimization and Validation Program and received information about mining at McClean Lake with initial engagement on the Midwest and Sue F mining projects. The committee additionally reviewed the emergency preparedness plans for Cameco's tailings facilities, the proposed B-Zone reclamation plan, Cigar Lake additional surface infrastructure and Terms of Reference for AJES. The Committee also participated in the design of the 2024 Community-Based Environmental Monitoring Program (CBEMP) in Fond du Lac, reviewed past CBEMP report findings and the Human Health Risk Assessment (HHRA).

The CBEMP conducts environmental monitoring throughout the Athabasca Basin. The CBEMP was developed to address potential concerns about the safety of traditional food that community members in the seven communities in the Athabasca regions consume on a routine basis. The CBEMP continues to show the health benefits of consuming traditional country foods, and that traditional foods and water near these communities remain safe. As a result, regular consumption of locally collected fish, meat, and vegetation is encouraged. The exceptions are select water bodies in the Uranium City area; here, residents are encouraged to respect local water and fish advisories. A Human Health Risk Assessment (HHRA) was conducted for each community in 2023 using CBEMP data. The HHRA results show that traditional foods are safe for consumption, and that community members should continue regularly eating locally harvested fish, wild game, berries, and plants, while respecting fish and water advisories.

The AJES has some familiarity with other regional monitoring programs such as the Eastern Athabasca Regional Monitoring Program (EARMP) and Independent Environmental Monitoring Program (IEMP), which are partly and wholly funded by the CNSC, respectively. The IEMP is discussed in the 2024 ROR. These programs also demonstrate that country foods remain safe and do not pose a risk to Athabasca Basin communities.

In summary, under the Collaboration Agreement, the AJES is the primary liaison for environmental information sharing between Cameco, Orano, YNLR and the seven Athabasca Basin First Nations and communities. However, through guidance from the sub-committee, Cameco and Orano also undertake additional activities such as site visits, community meetings, distribution of factsheets and discussions with Elders, youth and community members, alongside the activities of the Community Relations Liaisons to help engage the communities. Information at the request of the AJES and as it pertains to the ROR CMD has been shared with AJES members through its quarterly meetings.

AJES members acknowledge receipt of information about the operations presented at the 2024 meetings and contained within the AJES meeting packages and minutes. We appreciate the opportunity to provide this intervention to the CNSC Commission.

Sincerely,



Louise Bougie-Still,

AJES representative for the Athabasca municipalities of Stony Rapids, Wollaston Lake Post, Uranium City and Camsell Portage

- cc. Georgie McDonald, AJES Chair and representative for Fond du Lac Denesų́liné First Nation
 John Toutsaint, AJES representative for Black Lake Denesų́liné First Nation,
 Paul Denechezhe, AJES representative for Hatchet Lake Denesų́liné First Nation
 Dana Kellett, AJES representative for YNLR
 Brandi Gartner, AJES representative for Orano
 Anne Gent, AJES representative for Cameco