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**Written Submission from the
Ya'thi Néné Land and Resource
Office**

**Mémoire du
Bureau des terres et des
ressources de Ya'thi Néné**

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



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Ya'thi Néné Lands and Resources (YNLR)
In the matter of:

Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2024
Canadian Nuclear Safety Commission (CNSC)



1.0 Introduction

The Regulatory Oversight Report (ROR) is completed annually and presented by the Canadian Nuclear Safety Commission (CNSC). The document reports on the operating performance of uranium mines and mills licensees and licensed facilities, license changes, and major developments, and describes CNSC's regulatory efforts and engagement.

The currently active facilities included in the 2024 ROR are Cameco Corporation's operations at Cigar Lake, McArthur River, Rabbit Lake, and Key Lake, and Orano Canada's operation at McClean Lake. Cigar Lake, McArthur River, Key Lake, and McLean Lake operated throughout 2024, and Rabbit Lake remained in a state of care-and-maintenance in 2024 (and has been in care-and-maintenance since 2016). Detailed information is provided in the body of the ROR and accompanying appendices.

CNSC hosted a joint in-person and virtual meeting in Saskatoon on 17 September 2025 to discuss the 2024 ROR, during which CNSC provided a review and report of the performance of each above-mentioned facility, including radiation and environmental protection, conventional health and safety, and spills and incidents. CNSC also presented results from the Independent Environmental Monitoring Program (IEMP), and provided updates on upcoming Commission hearings and/or applications (Denison (Wheeler River), NexGen (Rook I), Paladin Canada Inc. (Patterson Lake South), Orano (license renewal, Midwest and Sue F), Saskatchewan Research Council (SRC; Gunnar), and financial guarantees for existing operations), Gunnar and Lorado, ongoing Canadian Uranium Workers Study (CANUWS), and the Uranium Mines and Mills Division's (UMMD) 10-year Inspection Plan.

1.1 Yá'łhi Néné Lands and Resources Office (YNLR)

The Yá'łhi Néné Lands and Resources Office (YNLR) works to protect the lands and waters of the Athabasca Basin for the long-term benefits of its Denesúliné First Nations and Athabasca communities, guided by their knowledge, traditions, and ambitions. YNLR is 100% owned by Athabasca Basin communities and governed by an independent Board of Directors appointed by elected community leaders. YNLR currently operates five offices, in Saskatoon, Fond du Lac, Black Lake, Hatchet Lake, and



Uranium City. As of 2024, in addition to many land- and resource-related initiatives, YNLR oversees, on behalf of the Basin communities, the implementation of the Collaboration Agreement, a partnership established in 2016 between the seven Athabasca Basin communities, Cameco, and Orano.

YNLR participates on all committees of the Collaboration Agreement that supports operation of Cameco and Orano's mines, mills, and exploration sites throughout portions of Nuhenéné (Traditional Territory of the Athabasca Denesūliné) in return for benefits to the communities.

Through the Collaboration Agreement, YNLR participates in the Athabasca Joint Environmental Subcommittee (AJES) alongside four community representatives and other observers. As a member of AJES, YNLR participates in quarterly meetings and various activities with Cameco and Orano, ranging from exploration to decommissioning.

On behalf of the seven Athabasca Basin communities, YNLR also oversees the implementation of over a dozen other benefit agreements with junior mining companies operating throughout Nuhenéné as well as multiple engagement agreements and contribution agreements with the provincial/federal governments on land related initiatives in the territory.

1.2 Document Timeline and Submission

YNLR applied for funding to participate in the 2024 ROR process and received confirmation of funding on 31 October 2025 from the Participant Funding Program through the CNSC.

YNLR staff, together with representatives from the Athabasca Land Protection Committee (ALPC), attended the in-person and virtual engagement session hosted by the CNSC on 17 September 2025 in Saskatoon. This meeting was beneficial in providing insight about CNSC-regulated activities in Nuhenéné including operations of the currently active mines and mills, upcoming Commission hearings and applications, the IEMP, CANUWS, and the UMMD's 10-year Inspection Plan.



After receiving and reviewing the 2024 ROR document and participating in the September meeting, YNLR is providing this submission on behalf of its Directors and Members.

2.0 Concerns and Comments

The following details YNLR's concerns and comments regarding several topics of importance that were discussed during the 2024 ROR meeting in Saskatoon and/or presented in the 2024 ROR document itself.

2.1 Fines Administered by CNSC

YNLR supports the CNSC in implementing fines to proponents as necessary and to ensure accountability is followed for regulated processes. YNLR would also appreciate timely information on such occurrences, as deemed appropriate by the CNSC. Timely notification of infractions enables YNLR to provide accurate information to Athabasca Basin Leadership and its members as appropriate, preventing the proliferation of misinformation.

2.2 Transparency in communication

YNLR supports the CNSC to enable proponents to communicate quickly and effectively on matters that impacts employment of community members. As mentioned in section 2.1, communication of information of interest enables YNLR to disseminate accurate information where appropriate, thereby preventing the spread of misinformation.

2.3 YNLR's Involvement in the CNSC's Independent Environmental Monitoring Program (IEMP)

YNLR appreciates our involvement with the IEMP, now for several years. YNLR conducts interviews with community members to provide input about sampling locations and traditional foods appropriate to the region, and YNLR staff assist with field work. Athabasca Basin residents also have the opportunity to donate samples of traditional foods that they would like to be tested for their safety.



In May 2024, YNLR and CNSC collaborated on a joint presentation about the IEMP at the Turtle Island Indigenous Science Conference in Regina, Saskatchewan. This was a welcome opportunity to showcase YNLR's partnership with the CNSC.

2.4 CNSC's Response to YNLR Feedback

Over the last several years, YNLR has provided suggestions to CNSC on improvements to processes that better serve Indigenous communities. YNLR acknowledges and appreciates CNSC efforts in this regard, particularly in granting YNLR longer speaking times at recent Commission proceedings.

3.0 Closing Remarks

We appreciate the progress and collaboration between YNLR and CNSC staff to date. This includes, but is not limited to: our Terms of Reference and associated regular meetings, work plans, and communications; YNLR involvement in IEMP including the opportunity to deliver a joint presentation at a scientific conference; and securement of two Indigenous Stakeholder and Capacity Funds (ISCF) to (1) support nuclear-related files and to coordinate and participate in CNSC activities, and (2) initiate the development of a resource useful to traditional land users in the Uranium City region.

YNLR acknowledges these initiatives by CNSC staff and how they have contributed to improved relationships and engagement with the Basin communities. We recommend that the CNSC and the Commission continue to further support the establishment of robust and inclusive processes for both themselves and license holders to enable more effective consultation and engagement with Nuhenéné communities and ultimately more optimized decision making for all stakeholders and rightsholders.

YNLR looks forward to further collaboration with the CNSC through our Terms of Reference to assist in identifying solutions to these concerns and to continue the dialogue to improve the regulatory process by which licensees and licensed facilities abide.