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

**Mémoire du
Athabasca Joint Engagement and
Environmental Subcommittee**

In the Matter of

À l'égard de

**Regulatory Oversight Report for Uranium
Mines, Mills, Historic and Decommissioned
Sites in Canada: 2017**

**Rapport de surveillance réglementaire des
mines et usines de concentration d'uranium et
des sites historiques et déclassés au Canada :
2017**

Commission Meeting

Réunion de la Commission

December 12, 2018

Le 12 décembre 2018

October 29, 2018

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Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
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Re: Intervention letter on Regulatory Oversight Report for Uranium Mines, Mills and Historic Decommissioned Sites in Canada: 2017

Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am pleased to provide a letter in regards to the 2017 Regulatory Oversight Report for Uranium Mines, Mills and Historic Decommissioned Sites in Canada (ROR).

The AJES is a subcommittee that flows from the Ya'thi Néné Collaboration Agreement¹ (CA). AJES members are the primary liaisons between Cameco, Orano, the Athabasca First Nations and Athabasca 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. As a representative of the Athabasca communities, I have been an active member of the AJES since inception in 2016 when the Agreement was signed and I continue to be an active member of the AJES.

Prior to the implementation of the CA, Cameco and Orano maintained a long standing relationship with the Athabasca communities. For over two decades, Cameco and Orano have engaged with Athabasca residents through subcommittees such as the Athabasca Working Group, the Environmental Quality Committee and through direct communication with community members and leadership. Over the years, the communities have been generally supportive of both Cameco and Orano's operations.

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 The Parties to the Ya'thi Nene Collaboration Agreement are: Cameco Corporation, Orano Canada Inc., Black Lake First Nation, Hatchet Lake First Nation, Fond du Lac First Nation, the community of Stony Rapids, the community of Uranium City, the community of Camsell Portage, and the community of Wollaston Lake.

- 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 for the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, Wollaston Lake)

The Ya'thi Néné Lands and Resource Office was also created at the time of 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. As this important environmental mandate is congruent with the AJES, one of the other members on the AJES is:

- The executive director of the Ya'thi Néné Lands and Resource Office

Community members are encouraged to bring forward any questions or concerns about the operations and the environment to their community AJES representatives. The AJES members will then raise the question during the quarterly meetings so that it can be addressed by the company representatives. As the local experts, the community AJES representatives also play an important role for the companies by providing advice, based on interest and need, regarding community engagement strategies for planned and future site based projects.

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 has been a big success, and since its initiation in 2000, routinely demonstrated that samples collected nearby the Athabasca communities are not influenced by the active uranium mining and milling operations in the region.

Moving forward, the AJES has agreed with a change to the AWG monitoring program. Initiated in the winter of 2018, the CBEMP will focus 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. The 2018 CBEMP focuses on the Black Lake First Nation and the community of Stony Rapids, and the program report is anticipated for release to the communities in early 2019.

Also recognised by the AJES is the Eastern Athabasca Regional Monitoring Program (EARMP). AJES is aware that the EARMP monitoring work is partially funded by the CNSC and is in full support of the program.

The AJES works to ensure information is shared regarding areas of interest that have specifically been identified by community members. For example, during the 2017 licence renewal of the McClean Lake operation, an interest in the decommissioning process for modern uranium mines

was identified. As a result, in June 2018, a detailed workshop on decommissioning activities, including the relevance and importance of community input into the decommissioning objectives, was held in Saskatoon. This workshop included participation from the CNSC and the Province of Saskatchewan to discuss the regulatory and oversight regime related to decommissioning.

In summary, the AJES is a single, joint forum for the companies and community members to share information on matters related to the environment, the operations, proposed authorizations, and to address issues raised by the communities. The single forum ensures that adequate operational and regulatory updates are reaching the Athabasca Basin communities ensuring community members are adequately informed and that community members' concerns are heard during engagement opportunities with the companies.

The AJES has reviewed the ROR submission. As you can see from Table 1 (attached), which outlines all the meetings the AJES had over the course of 2016 to 2018, we have been well informed about the operations included in this 2017 ROR.

Sincerely,



Denise Bougie, AJES – Athabasca Municipalities

cc. Georgie McDonald AJES - Fond du Lac Denesuline First Nation
Ray MacDonald, AJES - Black Lake Denesuline First Nation
Paul Denecheze, AJES - Hatchet Lake Denesuline First Nation
Linda McNab, AJES - Ya'thi Néné Lands and Resource Office
Veronica Roesler, AJES - Ya'thi Néné Lands and Resource Office
Carolanne Inglis-McQuay, AJES – Orano
Janna Switzer, AJES - Cameco

Table 1

Activity	Location and date	Key topic/ issues
AJES Meeting	October, 2016	Cameco project specific meeting with the AJES to discuss the proposed activity of hauling waste from Cigar Lake to Rabbit Lake Above Ground Tailings Management Facility
AJES Meeting	October, 2016	Official AJES meeting kick off meeting to discuss roles and responsibilities of all members. Update on site activities.
AJES Meeting	December, 2016	Review operational engagement plans for the 2017 year; 2017 exploration activities in the area; finalize new approach to Community Based Environmental Monitoring Program (CBEMP)
Site Tour of McClean Lake Operation	February, 2017	Detailed site tour of the McClean Lake Operation in order to ensure the AJES members were adequately informed in advance of the McClean Lake Licence Renewal; Detailed update on Rabbit Lake
AJES Meeting	May, 2017	Update on the McClean Lake Operation
AJES and Community Meeting in Hatchet Lake	September, 2017	AJES Meeting combined with Community Meeting in Hatchet Lake First Nation – AJES members presenting information on the change to the Community Based Environmental Monitoring Program
AJES Meeting	November, 2017	Review 2018 exploration activities; review operational engagement plans for 2018; Operational updates from McClean Lake, Cigar Lake and Rabbit Lake
AJES Meeting	February, 2018	Planning for Decommissioning Workshop; update on Operations
Workshop and AJES Meeting	June, 2018	Detailed workshop on Decommissioning of Uranium mines and mills; presentation from the CNSC on the ROR AJES meeting – Update on the Community Based Environmental Monitoring Program; Operational Updates; Planning for community meeting.
AJES Meeting	September, 2018	Update on the Community Based Environmental Monitoring Program; Operational Updates; Planning for community meeting
AJES and Community Meeting in Stony Rapids / Black Lake	Planned for November 19 and 20, 2018	Presentation to Black Lake First Nation and the municipality of Stony Rapids on the initial findings from the Traditional Food study program; regular AJES meeting to discuss community engagement planning for 2019; 2019 budget; Exploration activities