



**Written submission from
The Buffalo Narrows
Metis Community Council**

**Mémoire de
Buffalo Narrows
Metis Community Council**

In the Matter of

À l'égard de

Cluff Lake Project

Établissement de Cluff Lake

Request by Areva Resources Canada to accept the reduction of the Cluff Lake Project Financial Guarantee and Amend the Decommissioning Licence with the company's new name Orano Canada Inc.

Demande d'Areva Resources Canada pour accepter la réduction de la garantie financière du projet Cluff Lake et modifier le permis de déclassement avec le nouveau nom de l'entreprise, Orano Canada Inc.

Public Hearing - Hearing in writing based on written submissions

Audience Publique - Audience fondée sur des mémoires

June 2018

Juin 2018



BN - Metis Community Council

PO Box 250; Buffalo Narrows, Saskatchewan; S0M 0J0

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"Governance-Partnership-Service"

May 23, 2018

Canadian Nuclear Safety Commission
Slater Street, PO Box 1046-Station B
Ottawa, Ontario. K1P 5S9
cnscc.interventions.ccsn@canada.ca

RE: Request to Intervene
AREVA Cluff Lake Decommissioning License Amendments

CNSC Board of Directors:

The Buffalo Narrows, Metis Community Council is requesting from CNSC to approve our Metis Community Intervenor Status on the following CNSC hearing.

The date of hearing: June 5, 2018

Licensee/Applicant: AREVA Resources Canada Inc

Subject: Two amendments on existing cluff lake reclamation to : Revise existing financial guarantee and to change the licensee name .

Person to Intervene: Mr. Raymond Laliberte; Buffalo Narrows – Metis Community Council; Program Director-Coordinator; rlaliberte.metsnationlocal62@sasktel.net

Mail Address: PO Box 250, Buffalo Narrows, Saskatchewan; S0M 0J0.

Telephone: 306 235 2300 Office and 306 235 7317 Cell

Preference of Contact Communication: email first then cell phone next.

Presentation preference: In writing, through written submission.

Participant Funding Received: none.

Written Submission:

The Buffalo Narrows – Metis Community Council (BN-MCC) is the community governance board that is community mandated through the Metis Nation – Saskatchewan Constitution and has Metis National Council as our National representative. BN-MCC also represents the Metis individuals and families in the Northern Municipal Village of Buffalo Narrows, Saskatchewan.

The Metis in BN-MCC are the rights-holders that are protected in Canada Constitution under Section #35. The BN-MCC today struggles with governance-administrative capacity to represent and respond to our views on crown land license- permit requests.

Buffalo Narrows is located 283.63 km by air from Cluff Lake and 346 km by driving distance. Also since beginning of cluff lake exploration, mining operation to reclamation there is only one road access which comes through Buffalo Narrows main street.

The BN-MCC elders were part of the plaintiffs in the 1994 Northwest Metis land Claim.

The BN-MCC has been observing uranium development activity in our community since 1960 – to date and we consider all our citizens and BN-MCC as experts related to the matter that has to be decided on. The total amount of uranium mined from cluff lake in its life time including surface and sub surface mining methods is approximately 64 million pounds. The value of this mining operation is estimated to be in the 5.6 billion.

The adverse impact in reclamation cannot be only the cosmetic improvements to the immediate mining site land and environment but must also include the cumulative impact related to the entire mining **activities in their entirety**. In the opinion of the BN-MCC this included the impact of taking a valuable non renewable mineral resource (uranium) and its impact on our communities citizens for generations, going forward. This resource eliminated has to assist our BN-MCC Citizens to transfer sustainability of our economic base to some alternate source(s) such as tourism, etc.

BN-MCC has no issue with AREVA Resources Canada Inc to change the licensee name. We have been through many names since 1960 which include: AMOK, COGEMA, AREVA and now Orano Canada Inc only to ensure that all legal responsibility for corporate entity and responsibility remain the same.

BN-MCC opposes and has extreme concerns regarding with CNSC approval on the AREVA Canada Inc request to "revise the financial guarantee from current \$33.6 million to \$26.8 million on the AREVA's Cluff Lake Project licence expiry date of July 31, 2019 and have CNSC modernize the current licence . The difference of \$6.8 million must be used as suggested by the BN-MCC individuals and families to transform our economic base and sustain our communities for generations.

BN-MCC is formally requesting CNSC "shall" hold fiduciary responsibility as agent for the crown for adversely impacted Metis People to trigger the REGDOC -3.2.2 Aboriginal Engagement based on the fact that our community has not been consulted and meaningfully engaged or accommodated regarding the above issues and have not seen or discussed the details related to the proposed: "updated 2014 Detailed Decommissioning Plan ("DDP")".

Please advise on the next steps of the approval process. Thanks

Sincerely,

A handwritten signature in black ink, appearing to read "Raymond Laliberte", written in a cursive style.

Raymond Laliberte, Program Director-Coordinator
Buffalo Narrows – Metis Community Council