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Oral Presentation

Exposé oral

Written submission from the Athabasca Joint Engagement and Environmental Subcommittee

Mémoire de Athabasca Joint Engagement and Environmental Subcommittee

In the Matter of the

À l'égard de

**Orano Canada Inc.,
McClellan Lake Operation**

**Orano Canada Inc.,
Établissement minier de McClellan Lake**

Application for licence amendment for the expansion of the JEB Tailings Management Facility (TMF) at the McClellan Lake Operation

Demande de modification de permis pour l'agrandissement de l'installation de gestion des résidus (IGR) JEB à l'établissement de McClellan Lake

Commission Public Hearing

Audience publique de la Commission

October 4, 2021

4 octobre 2021

August 12, 2021

Senior Tribunal Officer, Secretariat
Canadian Nuclear Safety Commission
280 Slater St. Ottawa ON
Email: cncs.interventions.ccsn@canada.ca

Re: Intervention letter on licence amendment application for the expansion of Orano Canada Inc.'s (Orano) McClean Lake Operation JEB Tailings Management Facility (TMF)

Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am pleased to provide a letter regarding the licence amendment application for the expansion of Orano's McClean Lake Operation JEB Tailings Management Facility (TMF).

The seven Athabasca Basin communities (including the Denesuline First Nations of Black Lake, Fond du Lac and Hatchet Lake, along with the communities of Stony Rapids, Wollaston Lake, Uranium City and Camsell Portage) signed the Ya'thi Néné Collaboration Agreement¹ (CA) in 2016 with Orano and Cameco. The agreement confirms the partnership between the communities and industry in development of the uranium resources in the Athabasca Basin. The agreement also builds on an impact management agreement signed in 1999, and is structured on five pillars of workforce development, business development, community investment, and community engagement and environmental stewardship.

Under the agreement the AJES was created and appointed as the primary liaison between industry and the Athabasca Indigenous and municipal communities for the sharing of environmental monitoring and other environmental information and act as the first point of contact with respect to community engagement matters.

The 2020 CA report to the community, based on 2019 progress, outlined the great local work being done by all those involved under the agreement and noted \$62.2 million was provided for business development, community investment and workforce development to the Basin communities.

Prior to the CA, Orano engaged with Athabasca residents through subcommittees such as the Athabasca Working Group, the Environmental Quality Committee and through direct communication with community members (youth, Elders and land and resource users) and leadership.

The AJES meets at a minimum of four times per year and consists of the following members:

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 Orano
- 1 representative from Cameco
- 1 representative from the Black Lake Denesuline Nation
- 1 representative from the Hatchet Lake Denesuline Nation
- 1 representative from the Fond du Lac Denesuline Nation
- 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 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 and provide information to leadership. 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.

Orano engaged with AJES regularly regarding the McClean Lake Operation JEB TMF Expansion project including providing information at quarterly meetings and requesting feedback, a site tour of the JEB TMF in September 2020 describing the expansion and a workshop in May 2021 which provided technical information regarding tailings and the proposed JEB TMF Expansion. This 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 supports the licence amendment application for the expansion of Orano's McClean Lake Operation's JEB TMF. We have been well informed about the expansion plans. Orano adequately responded to questions raised during information sessions, tours and workshop, which included follow-up discussions on topics such as embankment stability, post closure vegetation, project schedule, protection of the receiving environment, future tailings capacity needs. Members of the AJES have not received concerns regarding the project from community members or our leadership. Orano has taken proactive measures during the current COVID-19 pandemic to ensure safety of workers and communities and we feel, the programs, processes and people are in place to safely plan, complete and operate the expanded tailings management facility.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jerilyn B.', is written over a horizontal line.

Jerilyn Benonie
AJES - Hatchet Lake Denesuline First Nation

cc. Garrett Schmidt, AJES - Ya'thi Néné Lands and Resource Office
Glenn Lafleur, AJES – Orano
Kristin Cuddington, AJES – Cameco
Georgie McDonald, AJES-Fond du Lac Denesuline First Nation
John Toutsaint, AJES- Black Lake Denesuline First Nation
Louise Bougie-Still, AJES-Athabasca PRO Communities