



**Written submission from
Orano Canada Inc.**

**Mémoire d'
Orano Canada Inc.**

In the Matter of the

À l'égard de

Cameco Corporation, Beaverlodge Project

Cameco Corporation, Projet Beaverlodge

**Application to amend its licence to allow
release of 18 Beaverlodge Project
properties from CNSC licensing**

**Demande de modification du permis de
Cameco visant à retirer 18 propriétés du
projet Beaverlodge du contrôle de la CCSN**

Commission Public Hearing

Audience publique de la Commission

March 24, 2022

24 mars 2022

Orano Canada Inc.

Written Intervention for Cameco Corporation Request to Amend the Beaverlodge Licence to allow release of 18 properties from CNSC licensing

CNSC Public Hearing March 23-24, 2022

February 2022

Introduction

Please accept this correspondence as Orano Canada Inc's (Orano) written intervention for Cameco Corporation's (Cameco) request to amend the Beaverlodge Project licence to allow for the release of 18 properties from CNSC licensing.

Orano Canada has been exploring for uranium, developing mines and producing uranium concentrate for more than 55 years. Headquartered in Saskatoon, Saskatchewan, Orano is a leading producer of uranium in Canada. Orano is the operator of the McClean Lake mill, the most technology advanced mill in the world for the processing of high-grade uranium ore without dilution. Orano is joint-venture partner in the Cigar Lake, McArthur and Key Lake mines and mill, operated by Cameco and is the sole owner/operator of the Cluff Lake Decommissioned Project. As such, Orano is familiar with the requirements to decommission a site, as well as the robust review process and level of engagement needed to prepare projects for acceptance into Saskatchewan's Institutional Control Program.

Orano has reviewed Cameco's application and supports the request to release 18 Beaverlodge Project properties from CNSC licensing. Cameco is a competent and responsible manager that has fully assessed the properties against the performance objectives as described in the Beaverlodge Management Framework, ensuring the properties are eligible for release from CNSC licensing and can be accepted in the provincial Institutional Control Program by the Saskatchewan Ministry of Energy and Resources.

Evaluation

Cameco has established and implemented a regulatory approved systematic process (the Beaverlodge Management Framework) for understanding environmental conditions and land use of the decommissioned Beaverlodge Project properties, with the objective to ensure the properties met the criteria for release from CNSC licensing.

Orano has reviewed the information presented by Cameco and supports the conclusion that each of the 18 properties meet the established performance objectives and are safe, secure, stable or improving and pose minimal risk to public safety and the environment and will support traditional activities, such as hunting/gather of country foods and the collection of firewood.

Upon release from CNSC licensing the properties are eligible for long-term stewardship in the province of Saskatchewan's Institutional Control (IC) Program, or free-release depending on the presence of historical mining/milling activity. The province of Saskatchewan accepts responsibility of properties that are entered into the IC Program, including the long-term monitoring, any potential maintenance and unforeseen events. The costs of these activities are covered by funds provided by Cameco to the province of Saskatchewan at the time of transfer.

Engagement

Cameco has implemented a robust Public Information Program for the Beaverlodge Project, ensuring target audiences that are interested in the decommissioned properties are informed about activities, potential effects on the environment and the health and safety of persons. In response to the restrictions in place due to the COVID-19 pandemic, Cameco adapted its engagement strategy to ensure opportunities existed to share information and receive feedback from interested parties, including virtual meetings and site tours.

In addition to the approved Public Information Program, in 2016, Cameco, along with Orano signed a confidential collaboration agreement (CA) with the seven Athabasca Basin Communities, referred to as the Ya' thi Néné CA. Two pillars of this CA, community engagement and environmental stewardship describe the company's obligations for informing and engaging with the Athabasca Basin communities. Engagement primarily occurs through the Athabasca Joint Engagement and Environmental Subcommittee (AJES), a committee formed through the CA to represent the Basin communities.

Another important group of community representatives is the Northern Saskatchewan Environmental Quality Committee (NSEQC), consisting of representatives appointed by provincial government, from 32 northern municipal and First Nations communities.

As both a signatory and a participant in presentations and information sharing opportunities with the AJES and the NSEQC, along with Cameco's robust Public Information Program, Orano is well-informed and confident in the level of engagement and outreach that Cameco has conducted on the Beaverlodge Project.

Country Food and Water Safety

Various programs such as the Community Based Environmental Monitoring Program (CBEMP), the Eastern Athabasca Regional Monitoring Program (EARMP) and a two-year study focused on the Uranium City area demonstrate that the country foods and water that are consumed by community members are safe and part of a healthy diet.

Cameco, in partnership with Orano, the Government of Saskatchewan and the CNSC established the Eastern Athabasca Regional Monitoring Program (EARMP) in 2011. The program assesses the ecological integrity of Saskatchewan's northern watersheds in order to address potential environmental concerns, to review potential environmental effects from uranium mining and milling and to identify sustainable management practices in the region.

The goal of the EARMP study design is to monitor for potential effects on the water, fish, berries, and wildlife in the Athabasca region downstream of uranium mining operations. The EARMP community program was developed to address potential concerns about the safety of traditional country foods. EARMP's community sampling program collects traditional country foods, which are currently tested by CanNorth Environmental Services, a 100% Indigenous-owned company, which then publishes an annual report. To date, the EARMP's community reports have consistently concluded that traditional country foods are safe for consumption.

Additionally, as part of the community engagement and environmental stewardship pillar of the CA, Orano and Cameco support the CBEMP, which builds off the previous data collected through the Athabasca Working Group Environmental Monitoring Program that started in 2000, with the objective to gain an understanding of traditional food use by community members and to assess if these foods remained safe for consumption. The studies obtain information from community members regarding the quantity, type and harvest location of traditional foods through community interviews. The results continue to demonstrate harvesting and eating traditional foods are integral components of good health for community members.

Conclusion

Through our close collaboration with Cameco over decades of shared operations and experiences, Orano is well-informed and confident in Cameco's competence as a responsible manager and the company's established measures, along with demonstrating performance for engaging northern communities, protecting the health and safety of workers and the public as well as the environment. Orano fully supports Cameco's assessment concluding that 18 Beaverlodge Project properties meet the criteria for release from CNSC licensing.