



Supplementary Information

**Written submission from
Orano Canada Inc. on the Request
for Ruling filed by the Ya'thi Néné
Land and Resource Office**

In the Matter of the

Cameco Corporation, Beaverlodge Project

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

Commission Public Hearing

March 24, 2022

Renseignements supplémentaires

**Mémoire d'Orano Canada Inc. au
sujet de la demande de décision
déposée par le Bureau des terres et des
ressources de Ya'thi Néné**

À l'égard de

Cameco Corporation, Projet Beaverlodge

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

Audience publique de la Commission

24 mars 2022

Subject: Response to the Request for Ruling filed by Ya'Thi Néné Lands and Resources Office in Respect to the March 24, 2022 Public Hearing related to Cameco Corporation's Application for a Licensing Decision to Amend the Beaverlodge Waste Facility Operating Licence to Allow Release of 18 Beaverlodge Properties from CNSC Licensing

Submitted by: Orano Canada Inc.

Date: March 9, 2022

As an intervenor to the March 24, 2022 public hearing for Cameco Corporation's (Cameco) request to amend the licence for the decommissioned Beaverlodge mine and mill site, releasing 18 decommissioned properties, Orano Canada Inc. (Orano) was notified by the Commission Registry of the Canadian Nuclear Safety Commission that the the Ya'thi Néné Land and Resource Office (YNLRO) has submitted a Request for Ruling (CMD 22-H5.15A).

At this time Orano is providing comment with respect to the Request for Ruling (2)¹ to adjourn the public hearing regarding Cameco's application to amend the decommissioned Beaverlodge mine and mill site licence to allow release of 18 properties from CNSC licensing, scheduled for March 24, 2022.

As a company operating in the uranium mining and milling industry in northern Saskatchewan, a partner with Cameco on other operations, a co-signer of the Collaboration Agreement signed with the Athabasca Basin First Nations and municipal communities in 2016 and participant in various engagement activities, Orano is well positioned to provide feedback on Cameco's efforts related to Indigenous and community engagement conducted on the decommissioned Beaverlodge mine and mill site.

The decommissioned Beaverlodge mine and mill site has been subject to longstanding engagement activities conducted by Cameco regarding the release of properties from CNSC licensing, including workshops, meetings and tours supporting site activities and public hearings held in 2009, 2013 and 2019. These engagement activities have provided opportunities for Cameco and regulators to hear expressed concerns and be advised of adverse impacts resulting from licensing decisions. The accepted regulatory process continues to be followed and applies to the 2022 licensing activity, with specific engagement opportunities occurring in 2020 and 2021.

It is Orano's understanding from the review of documents related to the decommissioned Beaverlodge mine and mill site that Uranium City has been identified as the primary stakeholder for this site, and as such has been the focus for engagement activities. Engagement has included workshops, community tours, meetings with leadership, and discussions with the Northern Saskatchewan Environmental Quality Committee, the Athabasca Working Group and then the Athabasca Joint Engagement and Environmental Subcommittee (AJES) formed through the 2016 Collaboration Agreement signed by Cameco, Orano and the Athabasca Basin First Nations and municipal communities (Black Lake Denesuline First Nation, Fond du Lac Denesuline First Nation, Hatchet Lake Denesuline First Nation, Camsell Portage, Stony Rapids, Uranium City, and Wollaston Lake). The YNLRO has a representative on this subcommittee and has intervened at previous public hearings regarding the decommissioned Beaverlodge mine and mill site. During the 2019 public hearing to amend the Beaverlodge licence for the release of 20 properties, the YNLRO expressed that they were *"pleased with the level of communication between the CNSC, Cameco and our office."*

¹ Ya'thi Néné Lands and Resources Office, 2022. Request for Ruling (2) *"An order that the Hearing be adjourned indefinitely or in the alternative, be adjourned for 12 months, in order to allow for the Duty to Consult and Accommodate to be fulfilled."*

Orano acknowledges the concerns raised regarding the safety and on-going regulatory oversight of properties following the release from CNSC licensing; however, we have confidence in the regulatory process and the framework developed cooperatively by Cameco and the Joint Regulatory Group consisting of the CNSC, Saskatchewan Ministry of Environment (SMOE), Department of Fisheries and Oceans (DFO) and Environment and Climate Change Canada (ECCC). This framework was reviewed by public stakeholders including Northern Saskatchewan Environmental Quality Committee (EQC), as well as residents and leaders of the Uranium City community to ensure the decommissioned Beaverlodge properties were remediated and meeting established performance criteria, in that the properties are safe, secure and stable/improving, prior to being released from CNSC licensing; the properties have unrestricted access, with no barriers to exercising Aboriginal or Treaty Rights.

Orano also highlights that properties released from CNSC oversight into the Institutional Control Program are not eliminated from regulatory oversight; properties are transferred to the Province of Saskatchewan, a responsible regulator, for on-going monitoring and oversight.

Orano's concern as licensee, operator, and joint-venture partner in uranium mining and milling operations in northern Saskatchewan, is that this could become a common strategy for intervenors, to raise concerns in the 11th hour in attempt to delay scheduled proceedings, rather than engaging with proponents in good faith, leading to significant regulatory uncertainty for both new proponents and existing licensees.

As stated in CNSC CMD 22-H5, the release 18 properties from CNSC regulatory oversight has undergone robust engagement and does not propose any new activities that could potentially impact the ability to exercise Aboriginal or Treaty Rights, as such Orano supports the hearing moving forward on its scheduled March 2022 date.