



**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

**Request for 2-Year Licence Renewal for  
Cameco Corporation's Beaverlodge Project**

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**Demande de renouvellement, pour 2 ans, du  
permis de Cameco Corporation pour le projet  
de Beaverlodge**

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Public Hearing - Hearing in writing based on  
written submissions

Audience publique - Audience fondée sur des  
mémoires

**March 2023**

**Mars 2023**

February 9, 2023

Georgie McDonald  
General Delivery  
Fond du Lac, Saskatchewan  
S0J 0W0

Senior Tribunal Officer, Commission Registry  
Canadian Nuclear Safety Commission  
280 Slater Street  
Ottawa, Ontario  
Email: interventions@cnsccsn.gc.ca

Re: Intervention letter on the 24-month renewal of the Beaverlodge Waste Facility Operating Licence.

Dear Senior Tribunal Officer:

On behalf of the Athabasca Joint Engagement and Environmental Subcommittee (AJES), I am providing a letter regarding Cameco's requested 24-month renewal of the Beaverlodge Waste Facility Operating Licence to allow Cameco time to complete the regulatory process and engagement associated with the release of the remaining 27 properties of the decommissioned Beaverlodge properties from CNSC licensing to Saskatchewan's Institutional Control Program (ICP).

The seven Athabasca Basin communities (Denesūliné First Nations of Black Lake, Fond du Lac, and Hatchet Lake and communities of Stony Rapids, Wollaston Lake, Uranium City, and Camsell Portage) signed the Ya'thi Néné Collaboration Agreement<sup>1</sup> (CA) in 2016 with Cameco and Orano. The Agreement confirms the partnership between the communities and industry in development of uranium resources in the Athabasca Basin relative to the existing operations. 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, community engagement, and environmental stewardship.

Under the Agreement the AJES was created and appointed as the primary liaison between Cameco, Orano, and the Athabasca First Nations and Athabasca communities for the sharing of environmental monitoring and other environmental information. AJES serves as the first point of contact for Cameco and Orano with respect to community engagement.

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<sup>1</sup> 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.

The Ya'thi Néné Lands and Resources Office (YNLR) was also created by the seven Athabasca Basin communities at the time of the signing of the Agreement for the benefit of the communities. YNLR has a mandate to protect the land and promote the interests of Basin residents. This mandate is congruent with all pillars of the CA.

Cameco and Orano established and maintained a relationship with the Athabasca communities prior to the CA. 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.

The AJES representatives are appointed by community Leadership and meet at a minimum of four times per year. The community and industry members consist of the following:

- 1 representative from Cameco
- 1 representative from Orano
- 1 representative from Black Lake Denesūliné First Nation
- 1 representative from Hatchet Lake Denesūliné First Nation
- 1 representative from Fond du Lac Denesūliné First Nation
- 1 representative for the Athabasca municipalities (Uranium City, Camsell Portage, Stony Rapids, Wollaston Lake)
- The Executive Director of Ya'thi Néné Lands and Resources

To support AJES, the Community Liaisons and invited guests attend AJES meetings. Community Liaisons are community members from the three First Nation communities who are employed by Cameco and Orano. Their role is to support the implementation of the CA within the Athabasca Basin communities.

AJES representatives and attendees are encouraged to bring forward questions or concerns from community members and/or Leadership about Cameco and Orano's operations so that concerns can be addressed by company representatives. Discussions range from exploration to decommissioning, including the decommissioned sites and impacts to the environment. As community members, the AJES representatives also play an important role for the companies by providing advice on community engagement strategies for planned and future site-based projects. As such, the AJES is the conduit for sharing of information between companies and communities, which is the process defined together under the agreement. The AJES, with support from the YNLR and the Community Liaisons, work to ensure operational and regulatory updates are provided to the Athabasca Basin communities in an effort to ensure community members are informed and concerns are heard.

One of the roles of the AJES is to review the Community-Based Environmental Monitoring Program (CBEMP). CBEMP conducts environmental monitoring throughout the Athabasca Basin, and is similar in scope to its predecessor, the Athabasca Working Group (AWG) environmental monitoring program. Since 2000, the AWG program has routinely demonstrated that samples collected near Athabasca communities are not negatively impacted by active uranium mining and milling operations in the region. The program continues to show the health benefits of consuming traditional country foods, and that traditional foods and water near these communities

remain safe. As a result, regular consumption of locally collected fish, meat and vegetation is encouraged, while respecting the water and fish advisories in the Beaverlodge area.

Each year, the CBEMP focuses on a single community area to conduct a dietary food survey and associated monitoring. Initiated in 2018, the CBEMP has been successfully completed in Stony Rapids, Black Lake, Fond du Lac, Hatchet Lake, and Wollaston Lake, with results presented to Leadership and community members. CBEMP is currently being conducted for the communities of Uranium City and Camsell Portage.

The AJES is familiar with the Eastern Athabasca Regional Monitoring Program (EARMP), which also supports environmental monitoring, and that this program is partially funded by the CNSC. Similar to the CBEMP program, EARMP includes sampling in Lake Athabasca and continues to demonstrate that country foods remain safe and do not pose a risk to Athabasca Basin communities. The recent 10-year anniversary of EARMP provided an opportunity to summarize and highlight the positive findings over the past decade in a summary report. The AJES endeavours to share information regarding areas of interest that have specifically been identified by community members.

Updates and discussion regarding Beaverlodge with AJES continue regularly in addition to Cameco's annual in-community meetings. During engagement with AJES, a variety of topics are discussed one of which is the development of a long-term monitoring plan as part of the Institutional Control Program requirements, to be implemented upon final release of the decommissioned Beaverlodge properties. This licence renewal will allow time for thorough engagement to occur with those interested, particularly those in the local vicinity of the Beaverlodge sites.

The AJES has received information about this licence renewal request and has been included in Cameco's plans for the development of a long-term monitoring plan.

Sincerely,

A handwritten signature in black ink, appearing to read 'Georgie McDonald', with a horizontal line underneath.

Georgie McDonald AJES – Fond du Lac Denesųłiné First Nation

cc. Jerilyn Benonie, AJES – Hatchet Lake Denesųłiné First Nation  
John Toutsaint, AJES – Black Lake Denesųłiné First Nation  
Louise Bougie-Still, AJES – Athabasca Municipalities  
Garrett Schmidt, AJES – Ya'thi Néné Lands and Resources  
Glenn Lafleur, AJES – Orano  
Kristin Cuddington, AJES – Cameco