



**Oral presentation**

**Exposé oral**

**Written submission from the  
Métis Nation-Saskatchewan**

**Mémoire de la  
Nation métisse de la Saskatchewan**

In the Matter of the

À l'égard de

**Cameco Corporation, Rabbit Lake  
Operation**

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**Cameco Corporation, établissement de  
Rabbit Lake**

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Application for the renewal of uranium  
mine/mill licence for Rabbit Lake Operation

Demande visant le renouvellement du permis  
d'exploitation de mine et d'usine de  
concentration d'uranium pour l'établissement  
de Rabbit Lake

**Commission Public Hearing**

**Audience publique de la Commission**

**June 7-8, 2023**

**7-8 juin 2023**

Cameco Corporation's Rabbit Lake Project Licence Renewal  
Request (CMD 23-H7)

## Written Intervention from the Métis Nation-Saskatchewan

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May 1, 2023

Project No.: R23C0084.00400.01

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**Document details**

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Project Name	Cameco Corporation's Rabbit Lake Project Licence Renewal Request (CMD 23-H7)
Document Title	Written Intervention from the Métis Nation-Saskatchewan
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## ABBREVIATIONS

Abbreviations	Name
Application	uranium mine/mill license renewal request for Rabbit Lake Operation
AJES	Athabasca Joint Engagement and Environment Subcommittee
Cameco	Cameco Corporation
CBEMP	Community-Based Environmental Monitoring Program
DDP	detailed decommissioning plan
EARMP	Eastern Athabasca Regional Monitoring Program
Homeland	Métis Homeland in Canada is the area of land in west central North America used and occupied as the traditional territory of the Métis, this area is linked to fur trade waterways, their livelihood, resources, and their alliances and kinship connections with nearby Indigenous peoples. The Métis were Federally recognized as a distinct people, separate from their First Nations and European ancestry in the <i>Manitoba Act</i> of 1870 and again in the <i>Canadian Constitution Act</i> of 1982.
IMA	impact management agreement
JIES	Joint Engagement Subcommittee
JIEES	Joint Engagement and Environment Subcommittee
Locals	local councils of Métis communities
MN-S	Métis Nation-Saskatchewan
NR1	Northern Region 1
NR2	Northern Region 2
NR3	Northern Region 3
PDP	preliminary decommissioning plan
Report	technical review report
RLO	Rabbit Lake Operation
TRC	Truth and Reconciliation Commission
TWC	Two Worlds Consulting
UNDRIP	<i>United Nations Declaration on the Rights of Indigenous Peoples</i>

## EXECUTIVE SUMMARY

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This technical report (Report) summarizes the review and analysis of the Cameco Corporation (Cameco) application to renew the uranium mine/mill licence (“Application”) for Rabbit Lake Operation (RLO) as well as supporting documents. The Report—prepared for submission to the CNSC—documents issues found in the Application and provides recommendations for the RLO going forward.

Two Worlds Consulting (TWC) conducted the review on behalf of Métis Nation-Saskatchewan (MN-S) taking into consideration:

- impacts to the Métis Homeland including legacy and cumulative effects from resource development projects.
- impacts to Métis kinship relationships.
- impacts to Métis land use activities.
- alignment with Métis interests under the 1994 Métis Land Claim, which covers the Project’s geographical area and which the Government of Canada and Métis Nation-Saskatchewan agreed to address through the 2018 Framework Agreement.
- alignment with MN-S’ *Duty to Consult and Accommodate Policy and Principles* and engagement expectations.
- acknowledgement and appropriate consideration of Métis Knowledge.

Technical review of the Application and supporting materials was guided by areas of primary interest to Métis; feedback shared by MN-S and NR1, NR2, and NR3 Regional Directors and Locals; and available funding. Seven key issues were identified during TWC’s review of Cameco’s Application and supporting materials:

- Inadequate engagement before Application.
- Inadequate engagement during Application.
- No Métis Knowledge included in Application.
- Lack of Métis participation, including in economic opportunities, in Application.
- Environmental monitoring and conclusions do not reflect Métis Knowledge or land use.
- Lack of commitments for continuing Métis involvement, including in plans for Decommissioning.
- Legacy and cumulative effects on long-term Métis interests.

MN-S was limited by resources from being able to adequately consider and respond to renewal request CMD 23-H7. Without the availability of further funding, MN-S is unable to engage subconsultants with care and maintenance, decommissioning, wildlife and terrestrial ecosystems, fish and fish habitat, and water quality expertise. Additional funding would also support engagement sessions between MN-S, Regional Directors, Locals, and Métis Citizens on the Application.

## 1. INTRODUCTION

In April of 2016, Cameco Corporation (Cameco) announced that production at the Rabbit Lake Operation (RLO) was suspended, and that the facility would be placed into a safe state of care and maintenance. Cameco anticipates it may resume production when market conditions improve. No exploration, development, or production activities have taken place since 2016.

While in care and maintenance

- the Mill will continue ongoing treatment of contaminated water.
- Eagle Point Mine activities will focus on the continued dewatering of the mine.
- the in-pit Tailings Management Facility will continue to operate.

To verify environmental protection is being achieved during the period of care and maintenance, RLO's water management practices and reclamation activities will continue to be monitored.

Cameco has applied to the Canadian Nuclear Safety Commission (CNSC) to renew the uranium mine/mill licence for the RLO ("Application"). Rabbit Lake Operation is in the Métis Homeland; specifically, Métis Northern Region 1 (NR1) with effects to Northern Region 2 (NR2) and Northern Region (NR3). The current Project licence is valid for a 10-year term that concludes on October 31, 2023. Cameco initially requested an indefinite term for the RLO licence but revised the Application to a 20-year term.

On behalf of Métis Nation-Saskatchewan (MN-S), Two Worlds Consulting (TWC) reviewed the Cameco Application and supporting materials to prepare this technical report ("Report") for submission to the CNSC. The Report documents issues and provides recommendations for the Project going forward.

### 1.1 Métis of Saskatchewan

The MN-S is recognized by Canada as "the democratic representative government of the Métis Nation within Saskatchewan and has the responsibility for providing responsible and

“*The Métis culture will continue to be lived and celebrated when we pass our knowledge on to the generations who follow us* (MN-S 2023, 1)”

accountable self-government for its Citizens and Métis collectively throughout Saskatchewan" (*Metis Nation within Saskatchewan Self-Government Recognition and Implementation Agreement*, 2023 s 5.02(c)). Canada also recognizes that MN-S "is exclusively mandated to represent the Metis Nation within Saskatchewan based on the authorizations it receives from its Citizens and the Metis collectively throughout Saskatchewan comprised of those Citizens, in respect of collectively held Metis Rights, interests, and claims" (*ibid* s. 5.02(e)).

MN-S operates in accordance with the *Constitution of the Metis Nation – Saskatchewan* ("Constitution"). NR1, NR2, and NR3 are "Regions", as defined in the Constitution, which are responsible under the Constitution for programs and services decentralized to the regional level

by MN-S. Each Region is governed by a Regional Council comprised of the presidents of the MN-S Locals (“Locals”) within the Region (positions which are elected but unpaid).

Under the Constitution, Locals are the basic unit of MN-S within each community which can be created or dissolved by Regions where ratified by the MN-S Métis Nation Legislative Assembly.

MN-S works in collaboration with Regions and Locals to support Métis consultation and engagement during the environmental assessment process. Métis rights are collective and are not specific to any Local or Region. Consultation and engagement with respect to Métis Aboriginal rights and interests requires consultation and engagement with MN-S, but may be facilitated through Locals and Regions in collaboration with the MN-S.

Past and existing resource development projects continue to affect Métis Citizens and communities. This Report reflects Métis of Saskatchewan valued interests and expectations.

## 1.2 Guiding Principles

TWC’s review on behalf of MN-S followed these guiding principles:

- Impacts to the Métis Homeland including legacy and cumulative effects from resource development projects
- Impacts to Métis kinship relationships
- Impacts to Métis land use activities
- Alignment with Métis interests under the *1994 Métis Land Claim*, which covers the Project’s geographical area and which the Government of Canada and Métis Nation-Saskatchewan agreed to address through the *2018 Framework Agreement*
- Alignment with MN-S’ *Duty to Consult and Accommodate Policy and Principles* and engagement expectations
- Acknowledgement and appropriate consideration of Métis Knowledge.

## 1.3 Documents Reviewed

TWC’s review was informed by the documents listed below:

- *Rabbit Lake Operation Annual Report 2021* (Cameco 2021b)
- *Rabbit Lake Operation Environmental Risk Assessment* (Cameco 2020)
- *Supplementary Information: Written submission from CNSC Staff in the Matter of the Cameco Corporation, Rabbit Lake Operation: Application for the renewal of uranium mine/mill licences for Rabbit Lake Operation* (CNSC 2023b)
- *Written submission from Cameco Corporation in the Matter of the Cameco Corporation, Rabbit Lake Operation: Application for the renewal of uranium mine/mill licences for Rabbit Lake Operation* (CNSC 2023c)
- *Preliminary Decommissioning Plan and Cost Estimate* (Cameco n.d.)



- CNSC Staff's *Position on the United Nations Declaration on the Rights of Indigenous Peoples* (CNSC 2022).

## 1.4 Methodology

Technical review of the Application and supporting materials was guided by areas of primary interest to Métis; feedback shared by MN-S, Regional Director of NR1, and NR1, NR2, and NR3 Locals; and available funding. As a result, the review focused on

- engagement before Application
- engagement during Application and expectations going forward
- Métis Knowledge
- care and maintenance period
- economic and procurement opportunities
- environmental monitoring
- decommissioning planning
- legacy and cumulative effects

## 2. TWO WORLDS CONSULTING

Two Worlds Consulting (TWC) is a Canada-wide social and environmental consultancy. We partner with Indigenous Nations, governments, and the private sector to support rigorous process, informed decision-making, and shared prosperity. TWC originated as a Certified Aboriginal Business based in Victoria, BC. Launched by Jennifer Campbell in 2016, TWC has evolved into a thriving consulting firm with reach from coast to coast to coast.

"Guidance with Integrity" is our brand promise and an internal call to action that governs all our work. At TWC, integrity is inherent in everything we do. In our role as project advisors, we use our experience and technical expertise to help project leaders and participants respectfully navigate complex processes, regulatory requirements, and decision-making that yields shared value.

### 2.1 TWC Reviewers

Daryl Harrison, BA, ADP GIS, provided review of the Application and supporting materials as well as senior technical authorship of TWC's reporting. Mr. Harrison has over 15 years' experience with resource development, land use planning and environmental assessments. He has contributed to socio-economic impact assessments across Canada and internationally.

Eliza Bethune, MPPGA, provided technical review of the Application and supporting materials as well as authorship of TWC's reporting. Ms. Bethune has 5 years designing, executing, and evaluating effective Indigenous, public, and stakeholder engagement programs. She has led and supported engagement programs for oil and gas, mining, road and rail, policy, contaminated sites, aluminum, and infrastructure projects, across a variety of regulatory jurisdictions.

Heidi Klein, MES, provided senior technical guidance of TWC's reporting. Ms. Klein has over 30 years of experience in the practice of environmental assessment, including legislation advisor,

project assessment, socio-economic impact assessment, Indigenous knowledge collection and documentation, cumulative effects assessment, and Indigenous and stakeholder relations.

### 3. ENGAGEMENT FEEDBACK

MN-S hosted an engagement session about the Application on April 21, 2023, with representatives from Cameco and the CNSC as well as NR1 Regional Director, NR1, NR2, and NR3 Locals. Interests, issues, and concerns identified by MN-S and NR1, NR2, and NR3 Locals in relation to the Application during the engagement session are outlined in Table 1.

MN-S has planned another engagement session about the Application on May 6, 2023. Feedback from this session will inform MN-S' presentation at the CNSC public hearing about the Application in June 2023.

*Table 1: Engagement Feedback*

Topic	Feedback Shared by MN-S, NR1 Regional Director, NR1, NR2, and NR3 Locals
Métis Knowledge, Homeland, and ways of doing	<ul style="list-style-type: none"> <li>• Noted Métis adopted traditions of the Woodland Cree and bridged their own distinct culture.</li> <li>• Noted NR1 and other regions within the Métis Homeland cover a vast area.</li> <li>• Acknowledged the interconnectedness of Métis across the Métis Homeland.</li> </ul>
Engagement	<ul style="list-style-type: none"> <li>• Recommended that Cameco improve their engagement with Métis and not rely on practices set when the RLO was licenced.</li> <li>• Confirmed that Métis are located throughout each region of the Métis Homeland and not all Métis communities are represented by a Local.</li> <li>• Expressed concern that Cameco focused engagement efforts on communities with Contribution Agreements and failed to engage all potentially impact Métis communities.</li> <li>• Noted First Nations benefit from the RLO and Métis do not.</li> <li>• Requested Cameco notify Regional Directors of permit amendments/requests to support information sharing with all Métis in their respective regions.</li> <li>• Emphasized the importance of Cameco having relationships with people in the north.</li> </ul>

Topic	Feedback Shared by MN-S, NR1 Regional Director, NR1, NR2, and NR3 Locals
	<ul style="list-style-type: none"> <li>• Noted Pinehouse and Patuanak do not speak for or represent all potentially impacted Métis communities and Cameco should not ignore communities above the 54<sup>th</sup> parallel.</li> <li>• Inquired how Cameco determined Indigenous communities to be engaged on the RLO. Noted engagement with Indigenous communities in close proximity to the RLO does not reflect Métis land use and ways of doing.</li> <li>• Noted Cameco representatives have not been to Beauval even though the RLO transportation route goes through Beauval.</li> <li>• Supported Cameco funded and organized site visits at the RLO.</li> <li>• Suggested Cameco’s reporting distinctly note public community meetings versus meetings with Métis leadership.</li> </ul>
Economic opportunities including procurement, employment, and education	<ul style="list-style-type: none"> <li>• Noted education and training benefits are not realized in northern communities. Funding provided to communities like Beauval has been limited (e.g., \$5,000 for education and training versus \$5 million provided to Saskatoon).</li> <li>• Requested Cameco consider economic opportunities for all potentially impacted Métis communities.</li> </ul>
Environmental monitoring	<ul style="list-style-type: none"> <li>• Expressed concern that Cameco relied on committees comprised of communities that had signed Contribution Agreements with Cameco to conduct environmental monitoring in and around the Project area.</li> <li>• Noted single Métis involvement in environmental monitoring (e.g., Curtis Fiss Local #80 – Stony Rapids for RLO) is not sufficient Métis involvement.</li> <li>• Expressed concerns for selenium and palladium entering the receiving environment from the</li> </ul>

Topic	Feedback Shared by MN-S, NR1 Regional Director, NR1, NR2, and NR3 Locals
	<p>RLO, as well as, wondering after other effluents.</p> <ul style="list-style-type: none"> <li>• Suggested Métis involvement in the development of monitoring criteria and questions.</li> </ul>
Legacy impacts	<ul style="list-style-type: none"> <li>• Reported that Métis have been affected by past mine failures in the Métis Homeland (e.g., metals releasing into the environment).</li> <li>• Inquired about the increase in uranium grade over time at the RLO.</li> </ul>

### 3.1 Métis Communities Engaged by Cameco

Figure 1 illustrates the Métis communities that Cameco has engaged on its RLO to date.

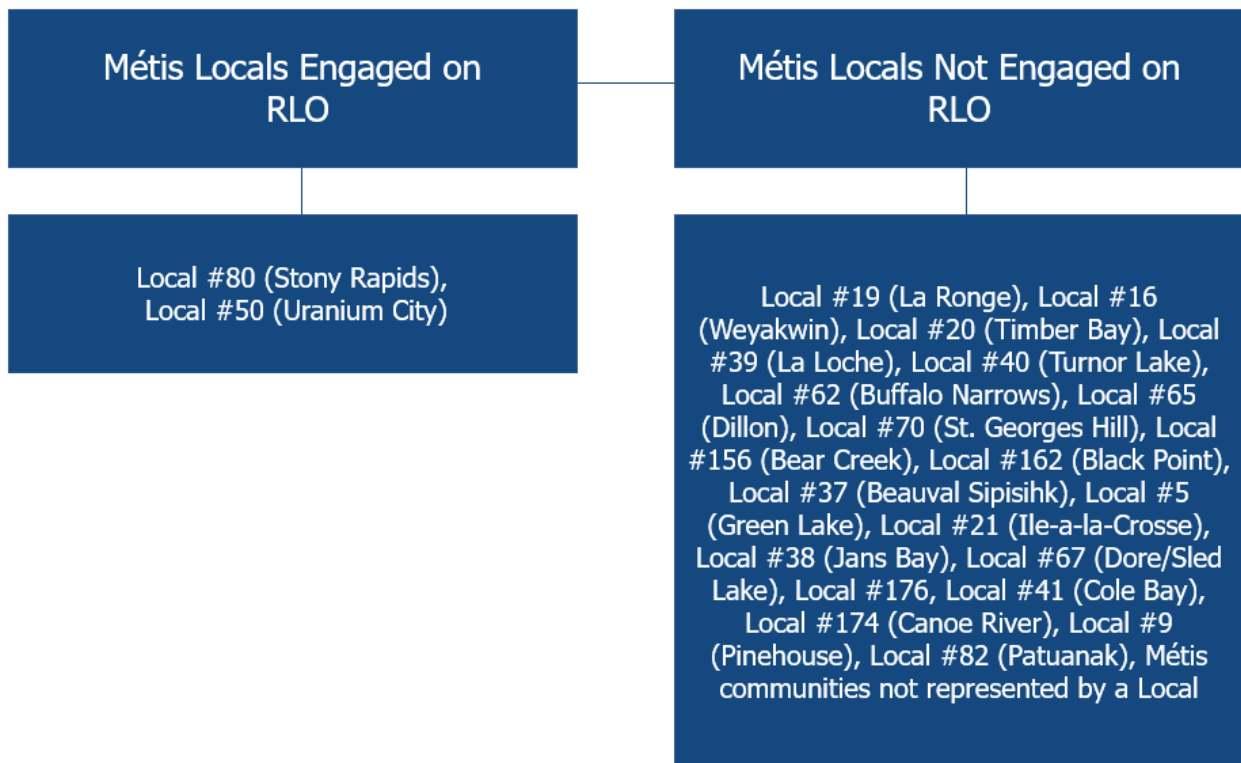


Figure 1: Métis communities engaged by Cameco on the RLO to date

## 4. DETAILED REVIEW

Section 4 details issues identified during TWC’s review of Cameco’s Application and supporting materials including a summary of each issue and recommendations for Cameco.

### *Issue 1: Inadequate engagement before Application.*

#### **Issue Summary**

- Cameco refers to “target” communities as “stakeholders” in its Application (CNSC 2023c). This language does not respect or uphold the recognition of Métis as Rights holders.
- Cameco relied on public engagement activities to engage the Métis. Public engagement activities do not constitute collaborative and meaningful two-way engagement with MN-S and MN-S Regional Directors and Locals. Though some public engagement meeting attendees may have been Métis, these meetings are not to be considered engagement with MN-S, including MN-S Regional Directors and Locals. Engagement with MN-S, MN-S Regional Directors and Locals, and Métis Citizens should be distinct from engagement efforts with the public and other Indigenous Nations. This includes information sharing outlined in Cameco’s Public Disclosure Protocol.
- Despite Canada’s recognition of MN-S as the *exclusively mandated* representative of *Métis rights, interests, and claims*, Cameco did not include MN-S.
- MN-S and NR1, NR2, and NR3 Regional Directors and Locals are not considered “primary” or “target” audiences under Cameco’s RLO engagement program. Cameco’s Application states, “The primary audience for the RAM-PIP is the rights-bearing First Nation and Métis communities and municipalities of the Athabasca Basin that are located in the vicinity of the site” (CNSC 2023c, 48). “Primary” and “target” audiences identified by Cameco include Black Lake Denesų́liné First Nation, Fond du Lac Denesų́liné First Nation, and Hatchet Lake Denesų́liné First Nation.
- Cameco engaged Métis through public engagement activities. Cameco notes in its Application that they engaged with the Métis in the vicinity of RLO through their Contribution Agreement, and worked with Uranium City Métis Local #50 and the Stony Rapids Métis Local #80 (CNSC 2023c).
- The Athabasca Joint Engagement and Environment Subcommittee (AJES) does not include representation from MN-S, NR1, NR2, and NR3. Cameco engaged Indigenous Nations primarily through the AJES (CNSC 2023c).
- Despite Canada’s recognition of MN-S as the *exclusively mandated representative of Métis rights, interests, and claims*, Cameco did not include MN-S, specifically or in tandem with potentially impacted NR1, NR2, and NR3 Regional Directors and Locals, in this discussion and therefore engagement principles do not reflect feedback from representatives of Métis. Cameco noted in its Application that engagement activities were guided by principles developed through roundtable consultation with northern opinion leaders (CNSC 2023c).

- Engagement activities were not conducted with MN-S, specifically or in tandem with potentially impacted NR1, NR2, and NR3 Regional Directors and Locals. Cameco noted in its Application that engagement activities included meetings and events at RLO such as tours, and technical workshops.
- The methods of engagement used for the Application are not considered sufficient for engaging MN-S, specifically or in tandem with potentially impacted NR1, NR2, and NR3 Regional Directors and Locals. Cameco noted in its Application that methods of engagement included conventional media, social media, and polling.
- No engagement events were conducted with MN-S or any NR1, NR2, and NR3 Regional Directors and Locals. Cameco conducted 94 engagement events in its current licence term. Cameco's Indigenous Engagement Report dated February 23, 2023 includes a summary table of some of Cameco's engagement conducted by Cameco from 2013 to present. The summary table does not include one reference to engagement with MN-S or any NR1, NR2, and NR3 Regional Directors and Locals.
- CNSC has relied on Cameco to help meet consultation obligations. Cameco's consultation approach was not satisfactory for consulting MN-S specifically or in tandem with potentially impacted NR1, NR2, and NR3 Regional Directors and Locals.

### **Recommendations for Cameco**

- Co-develop an Indigenous Engagement Program with and for MN-S which includes ongoing involvement of NR1, NR2, and NR3. Meet with MN-S and NR1, NR2, and NR3 to discuss engagement expectations going forward including
  - scheduling and frequency.
  - preferred methods of engagement (e.g., community open houses).
  - communication pathways.
  - information sharing requirements (e.g., meetings with accompanying plain language materials).
  - capacity funding.
  - opportunities for involvement in environmental monitoring and decommissioning planning.
- Implement and report annually on the Indigenous Engagement Program with MN-S, including in tandem with, NR1, NR2, and NR3. Share the annual report with MN-S, NR1, NR2, and NR3 for review and comment. This reporting should include a detailed record of contact between Cameco and MN-S, NR1, NR2, and NR3. The record of contact should include
  - all phone call, meeting, and email communications between Cameco and MN-S/NR1/NR2/NR3/Métis Citizens.
  - summary description of details shared via phone, email, or meeting.
  - who was involved.

- any issues/interests shared by MN-S, NR1, NR2, NR3, Métis Citizens during all communications (i.e., phone call, email, meetings) and resolution to the issues.
- list materials and documents shared via each email as well as during meetings, workshops, and other engagement events.
- Provide funding to support MN-S, NR1, NR2, and NR3's involvement in meetings to discuss engagement expectations, the development of an Indigenous Engagement Program, and review of the annual Indigenous Engagement Report.

### *Issue 2: Inadequate engagement during Application preparation.*

#### **Issue Summary**

- MN-S was made aware of Cameco's request through the CNSC and therefore did not have the opportunity to share concerns with this request directly with Cameco up to the development of the Application. Cameco initiated engagement activities about the RLO Application in 2021 (CNSC 2023c). Cameco primarily engaged the AJES about the request to renew the RLO (CNSC 2023c). Cameco also discussed the request to renew the RLO licence at the Northern Saskatchewan Environmental Quality Committee meetings (CNSC 2023c).
- Cameco created a dedicated webpage for posting relicensing information (CNSC 2023c). Posting relicensing information on a webpage is not considered an appropriate method of engagement with MN-S, NR1, NR2, and NR3.
- Cameco states its corporate values, commitments, and measures of success align with the Crown's duty to consult and accommodate which constitutes sound business practices (CNSC 2023c). Cameco has not sufficiently engaged MN-S, NR1, NR2, and NR3 on the RLO Application to understand potential adverse impacts of a 20-year permit to the Métis. Cameco noted in its Application that it recognizes the right of Indigenous Peoples to be consulted on projects that could potentially impact the exercise of Indigenous or treaty rights (CNSC 2023c). A 20-year permit without an engagement plan co-developed by MN-S, in tandem with, NR1, NR2, and NR3 will limit Métis input and involvement.
- Cameco invited AJES and community members to visit the RLO in August 2022. Cameco does not note if any of the community members invited on the site tour were Métis. The site tour invitation was not extended to MN-S on its own or in tandem with NR1, NR2, and NR3 Regional Directors and Locals.
- Cameco conducted public engagement meetings specific to the RLO Application in Uranium City, Black Lake, Stony Rapids, Fond du Lac, and Wollaston Lake between November 21 and 23, 2022. The CNSC was also present during these meetings. Though some meeting attendees may have been Métis, these meetings are not to be considered engagement with MN-S or NR1, NR2, and NR3 Regional Directors and Locals.

#### **Recommendations for Cameco**



- Arrange site visits for MN-S and NR1, NR2, and NR3 Regional Directors and Locals. Provide funding to support MN-S, NR1, NR2, and NR3's involvement site visits and meetings to discuss Cameco's RLO Application.
- Meet with MN-S, in tandem with, NR1, NR2, and NR3 to discuss any issues coming out of the review of the renewal and discuss resolution of the issues.
- Meet with MN-S, in tandem with, NR1, NR2, and NR3 to discuss engagement expectations going forward including preferred methods of engagement (e.g., community open houses), communication pathways, and information sharing and documentation requirements (e.g., meetings with accompanying plain language materials). Provide funding to MN-S, NR1, NR2, and NR3 for the development of the engagement plan and participation in the development of the plan and related engagement activities.
- Meet with MN-S, in tandem with, NR1, NR2, and NR3 to discuss its position on UNDRIP and MN-S' Guiding Principles including its interpretation of free, prior, and informed consent regarding longer licence terms. Reflect MN-S and NR1 feedback from these meetings in permitting documents shared with the CNSC and/or Government of Saskatchewan.

### *Issue 3: No Métis Knowledge included in Application.*

#### **Issue Summary**

- Cameco's Application does not include Métis Knowledge, or the commitment to include Métis knowledge in the future decision-making and management of the RLO going forward.

#### **Recommendations for Cameco**

- Provide funding to support MN-S, in tandem with, NR1, NR2, and NR3 to conduct a Métis Knowledge Study to understand potential effects to the Métis resulting from a licence renewal for RLO. This study should be conducted before Cameco comes out of care and maintenance and re-starts operations or goes into decommissioning at the RLO; if the Application is approved by the CNSC.

### *Issue 4: Lack of economic opportunities for Métis in Application.*

#### **Issue Summary**

- Cameco did not sign an impact management agreement (IMA) with MN-S or with any of the potentially impacted NR1, NR2, and NR3 Regional Directors and Locals (CNSC 2023c). NR1, NR2, and NR3 Regional Directors and Locals were never engaged on RLO benefits related to workforce development, business development, or community investments (e.g., preference for hiring, career awareness programs, scholarship funding, preference for community-owned businesses, community projects, community engagement, and environmental stewardship). Cameco and Orano signed an IMA with Black Lake Denesūłiné First Nation, Fond du Lac Denesūłiné First Nation, Hatchet Lake Denesūłiné First Nation, and municipalities including Northern Settlement of Camsell Portage,



Northern Hamlet of Stony Rapids, Northern Settlement of Uranium City, and Northern Settlement of Wollaston Lake. Cameco and Orano signed a Collaboration Agreement in 2016 with these same communities (CNSC 2023c). Cameco has invested over \$28 million into Athabasca Basin communities since 1999 and over \$592 million on businesses eligible under the Contribution Agreement.

- Cameco notes in its Application that about half of their employees and long-term contractors at RLO are residents of northern Saskatchewan and part of “primary target audiences” (CNSC 2023c, 50). Cameco did not acknowledge what percentage of their workforce at the end of 2022 were Métis. This information contradicts the “primary audience” communities listed on page 48 of Cameco’s Application (CNSC 2023c).

### **Recommendations for Cameco**

- Engage with MN-S in tandem with NR1, NR2, and NR3 Regional Directors and Locals to better understand employment and procurement interests on RLO and the potential for Métis specific education to join the Uranium Mining work force.
- Co-develop and sign a Collaboration Agreement with MN-S and any impacted NR1, NR2, and NR3 Regional Directors and Locals who are not signatories to existing Collaboration Agreements.
- Provide funding to support MN-S, NR1, NR2, and NR3’s involvement in the development of a Collaboration Agreement and related meetings.

### ***Issue 5: Environmental monitoring and conclusions do not reflect Métis Knowledge or land use.***

#### **Issue Summary**

- MN-S directly or through NR1, NR2, and NR3 Regional Directors and Locals have not been involved in the Eastern Athabasca Regional Monitoring Program (EARMP). The EARMP environmental monitoring and conclusions drawn do not reflect Métis Knowledge or land use in and around the RLO. Cameco relied on the EARMP to monitor the safety of traditionally harvested country foods by collecting and testing representative water, fish, berry, and mammal tissue samples from seven communities located in the region. Cameco did not note which communities are sampled as part of the EARMP in its Application. The 10-year summary report prepared by the EARMP states the communities in the region studied does not include MN-S or any potentially impacted Métis communities. Cameco stated in its Application that sampling locations focus “on areas where community members fish, hunt, and gather, and samples are collected by, or with the aid of, community members” (CNSC 2023c, 51). Cameco has relied on the 2021/2022 EARMP results to determine that “country foods are safe for consumption with chemical profiles for water, fish, berry, and mammal tissue samples” (CNSC 2023, 51).
- Cameco noted in its April 21, 2023 presentation to MN-S, NR1 Regional Director, and NR1, NR2, and NR3 Locals that the Community-Based Environmental Monitoring Program (CBEMP), formerly the Athabasca Working (AWG) Program, is a focused “monitoring program that alternates yearly with the different communities in the Athabasca Basin”

(Cameco 2023, 15). Cameco shared that studies through the CBEMP have been conducted for Black Lake, Stony Rapids, Fond Du Lac, Hatchet Lake, Wollaston Lake, Uranium City, and Camsell Portage (Cameco 2023). The CBEMP relies on the support of community members to help with data collection on foods they eat, how much they eat, and where food comes from (Cameco 2023). The CBEMP was developed under the Ya'Thi Néné Collaboration Agreement which does not include representation from MN-S or potentially impacted NR1, NR2, and NR3 Regional Directors or Locals.

### Recommendations for Cameco

- Ensure Métis involvement in the CBEMP and EARMP if Cameco intends to continue to rely on the EARMP to inform determinations on project-related effects to human health and Indigenous land use. Cameco should include a culturally appropriate monitoring program that specifically involves Métis, to advise Cameco during remaining operations and decommissioning planning.
- Provide funding to support MN-S, NR1, NR2, and NR3 design, implement, and report annually on a Métis environmental monitoring program for the RLO. Incorporate findings from the Métis environmental monitoring program to RLO human health risk assessments. Share a copy of the updated human health risk assessment, including plain language materials reflecting findings from the Métis environmental monitoring program with the MN-S for NR1, NR2, and NR3 for review and comment. The Métis environmental monitoring program will enhance Cameco's understanding of project-related impacts to the safety of traditional foods that community members routinely consume by incorporating Métis Knowledge, ways of knowing, and doing.
- Meet with MN-S and NR1, NR2, and NR3 to discuss
  - engagement expectations going forward (e.g., frequency of engagement).
  - preferred method of engagement (e.g., community open houses).
  - communication pathways.
  - information sharing requirements (e.g., meetings with accompanying plain language materials).
  - capacity funding.
  - opportunities for involvement in environmental monitoring and decommissioning planning.

### *Issue 6: Decommissioning plans did not include engagement with Métis.*

#### Issue Summary

- Cameco did not engage MN-S, directly or in tandem with impacted NR1, NR2, and NR3 Regional Directors and Locals in the development of the preliminary decommissioning plan (PDP). Cameco provided information that describes the requirements, objectives and key elements of the preparation of a RLO PDP as a high-level plan for decommissioning and a preliminary decommissioning cost estimate (Cameco Corporation. n.d.). The information

provided by Cameco in the PDP highlights an objective to return the site to a condition suitable for traditional land use, and that a detailed decommissioning plan (DDP) would be developed with consideration of feedback provided by relevant stakeholders through engagement. It's expected that Cameco will engage MN-S or all potentially impacted NR1, NR2, and NR3 Regional Directors and Locals in the development of the DDP.

- CNSC staff determined that the decommissioning activities, which will take place in a staged manner over years, and the cost estimate was sufficient to cover the decommissioning liabilities.
- Cameco noted in its Application that the RLO has ongoing reclamation activities in areas of the site no longer required for future mining or milling activities (CNSC 2023c).

### **Recommendations for Cameco**

- Engage MN-S in tandem with all potentially impacted NR1, NR2, and NR3 Regional Directors and Locals on the PDP and in the development of the final DDP. The DDP should not be considered final until feedback from MN-S and NR1, NR2, and NR3 Regional Directors and Locals is incorporated.
- Share the draft Detailed Decommissioning Plan with MN-S and potentially impacted NR1, NR2, and NR3 Regional Directors and Locals for review and comment.
- Involve MN-S and all potentially impacted NR1, NR2, and NR3 Regional Directors and Locals on their expectations on progressive reclamation on an on-going basis.
- Include Métis Knowledge in the preparation and design of any decommissioning plans.
- Provide funding to support MN-S, NR1, NR2, and NR3's involvement in current decommissioning and future decommissioning planning (e.g., participating in meetings, reviewing documents, and ongoing involvement).
- Meet with MN-S, in tandem with NR1, NR2, and NR3, to discuss
  - engagement expectations going forward (e.g., frequency of engagement).
  - preferred method of engagement (e.g., community open houses).
  - communication pathways.
  - information sharing requirements (e.g., meetings with accompanying plain language materials).
  - capacity funding.
  - opportunities for involvement in environmental monitoring and decommissioning planning.

*Issue 7: Legacy and cumulative effects on long-term Métis interests.*

**Issue Summary**

- Cameco's Application, beyond the EARMP, did not include cumulative effects considerations important to MN-S, NR1, NR2, and NR3 (e.g., fish health and water quality).
- Métis Citizens are living with the legacy of the RLO while in care and maintenance without deriving any benefits and will be living with the legacy of RLO in the post-decommissioning period.

**Recommendations for Cameco**

- Meet with MN-S in tandem with NR1, NR2, and NR3 to better understand legacy and cumulative effects of the RLO, and other uranium mills and mines in the Athabasca Basin on the Métis. This would allow Cameco to better understand the ongoing impacts of past and existing activities that continue to affect Métis kinship and use of lands and resources in the Métis Homeland. Cameco to provide funding to support MN-S, NR1, NR2, and NR3's involvement in this meeting.
- Provide funding to support MN-S, NR1, NR2, and NR3 establish a working group to develop, evaluate, and action measures to address cumulative effects concerns from Cameco's operations in the Athabasca Basin.
- Include Métis Knowledge in the preparation and design of any decommissioning plans.

## 5. CLOSURE

TWC prepared this report for MN-S to submit to Cameco and the CNSC for review to better understand the extent of potential RLO Licence renewal impacts to MN-S. If there any questions about the contents of this report, please contact the undersigned:

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