



June 7th, 2022

Mr. Jim Delaney
Director, Uranium and Radioactive Waste Division
Electricity Resources Branch
Natural Resources Canada

Dear Mr. Delaney,

The Athabasca Basin in Northern Saskatchewan is a unique geographic area in Canada and has been a very active mining and exploration region for uranium for over 80 years. Other commodities in the area of interest to proponents include gold, cobalt, nickel and rare earth elements.

The Ya'thi Néné Land and Resource Office works to promote and enhance the environmental, social, cultural, and economic health and well-being of the Athabasca Basin Communities (being Black Lake First Nation, Fond du Lac First Nation, Hatchet Lake First Nation, Stony Rapids, Wollaston Lake, Uranium City and Camsell Portage) and their residents. This organization is the first point of contact between industry, government, and the local residents of the Athabasca Region regarding land and resource management. We effectively work to promote sustainable development while providing information, education, and a supportive voice to the residents of the Athabasca Region.

The Ya'thi Néné Land and Resource Office provides a critical point of contact between residents of northern Saskatchewan, Indigenous groups, and the mineral industry, particularly uranium proponents. Our office engages with community members to gain traditional knowledge, insights, and opinions relevant to Northern Saskatchewan Mines, Mills and Decommissioned/Historic sites.

The Ya'thi Néné Land and Resource Office monitors the impacts of uranium Mines, Mills and Decommissioned/Historic sites on the Traditional Territories (Nuhénéhé) of the Athabasca Denesūłiné First Nations. We are mandated by the First Nations and municipal communities to represent their collective interests, to give them a voice for their concerns and report directly back to our community appointed board of directors and local leadership. We are guided by their knowledge, traditions, and ambitions.

Ya'thi Néné Lands and Resources

100-335 Packham Ave, Saskatoon, Saskatchewan S7N 4S1

Phone: (306) 477-1251 Fax: (306) 802-4895

The Ya'thi Néné Land and Resource Office works to protect the land and promote the people, protect Aboriginal and Treaty Rights and to ensure all historic sites are decommissioned to standards that meet our member's expectations. The protection of Nuhenéné is no small task. The Athabasca Denesuḡiné way of life is deeply connected to the health of the land and the way its resources are managed. Our cultural identity, spirituality, and overall wellbeing are all tied to how we interact with Nuhenéné. Part of that is the Athabasca Denesuḡiné's role as caribou people. It's no mystery as to why this culture is so deeply linked to the barren-ground caribou that provide the cornerstone of Denesuḡiné culture. And as the stewards of Nuhenéné, it is the sacred duty of the Athabasca Denesuḡiné to protect this land and preserve its resources for future generations.

There is concern locally and globally about the risk of wastes generated by uranium exploration, mining and milling on the plants, animals, water, land, and air over time. Adding to local sensitivities around potential uranium industry impacts is the legacy of the abandoned mines and exploration sites in the region. Many of the mines operated and closed from the 1950s to 1980s which was during a time when environmental protection, decommissioning & reclamation requirements were minimal along with consultation and engagement requirements with indigenous people. Hence there is a legacy of minimal participation and long-term damage to the land that impacts local perspective about industry in the region and sometimes traditional land use activities in certain areas.

Taking the above into consideration, the following are our comments and feedback on the 'DRAFT MODERNIZING CANADA'S POLICY FOR RADIOACTIVE WASTE MANAGEMENT AND DECOMMISSIONING':

Page 3 - Government of Canada's vision for radioactive waste management and decommissioning:

- Include reference to the need for government and industry to increase their understanding of how historic and current radioactive waste impacts Treaty and Aboriginal Rights. From our perspective, these impacts are not clearly understood or acknowledged.

Page 4 – Principles advance three key areas to be prioritized in terms of federal government commitments:

- Include a fourth principal, "Acknowledge impacts to Treaty and Aboriginal rights while working with impacted communities to support reconciliation, mitigate impacts and compensate for any degradation."

Page 5 – Section 1, modify section to include the underlined wording:

- “Health, safety, security and environmental protection are the federal government’s top priorities with respect to radioactive waste management and decommissioning. The government is committed to ensuring that responsibilities are clearly delineated, and that the necessary policy and legislative framework are in place to establish requirements, guidance, licensing and compliance in these priority areas. This applies to waste arising both from normal operations, historic sites, decommissioning, and from nuclear or radiological emergencies.”

Page 5 – Section 1.2, modify section to include the underlined wording:

- “has established a legislative and regulatory regime, centered on an independent nuclear regulator with meaningful participation from impacted indigenous communities, to oversee and regulate radioactive waste management and decommissioning, including funding and operational responsibilities in accordance with approved waste disposal and decommissioning plans;”

Page 5/6 – Section 1.4, modify section to include the underlined wording:

- “recognizes the long time scales associated with the management of radioactive waste and the associated obligations to ensure ongoing stewardship of radioactive waste disposal facilities and sites once closed, so that they remain safe and secure for people and the environment in perpetuity. The federal government ensures that responsibility for maintaining institutional controls over the very long term is assigned to an appropriate entity with meaningful inclusion and participation from impacted indigenous communities to mitigate impacts of fear and stigma associated with impacted sites, and that there is continuity of responsibility over successive entities if necessary, and, where no appropriate entity is available, it works with other levels of government, including indigenous government, to develop arrangements to ensure that such controls are maintained;”

Page 7 – Section 2.6, modify section to include the underlined wording:

- “engage with Indigenous peoples, provinces, territories, interested communities, scientific experts and other interested persons in Canada to develop and maintain an integrated strategy for radioactive waste management and decommissioning activities that defines, reports on and sets out approaches for the long-term management, including disposal, of all of Canada’s historic, current and future radioactive wastes; “

Thank you for the opportunity to provide comments.

Sincerely,

A large black rectangular redaction box covering the signature and name of the sender.