Regulatory Oversight for Cluff Lake Mine Reclamation, Closure, and Long-Term Management Saskatchewan Ministry of Environment	
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Thank you for the opportunity to present today. The information that I plan to share regards the regulatory oversight for the Cluff Lake uranium mine and mill site as it has moved through its life cycle past decommissioning and into Institutional Control



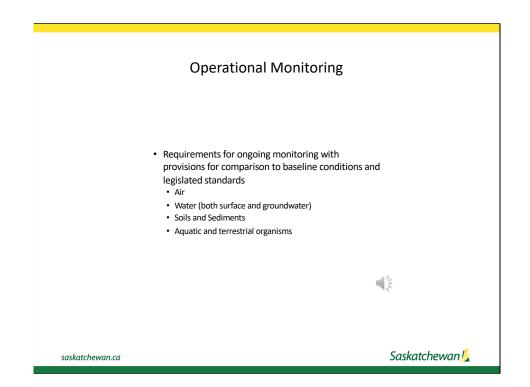
As part of the discussion, I think it's a good idea to provide a bit of information on how we arrived at this point, so I'll share some history of the regulatory oversight that has been provided since the project started. I'll describe work done to support the decommissioning and reclamation and provide some information on how institutional control works in Saskatchewan, as it's something that we are proud to have as an option for the end state of sites.



For reference, this is a list of Saskatchewan legislation applicable to mine regulation.



Regulatory oversight of the Cluff Lake project began in earnest in the late 1970's. As a response to environmental assessment information presented by the company and public concern respecting uranium mining in Saskatchewan, the Cluff Lake Board of Inquiry was established to examine, among other things, the probable environmental effects of this project. As part of this work, recommendations were made regarding monitoring requirements and for the provision of decommissioning and reclamations criteria in legislation that were adopted by the province.

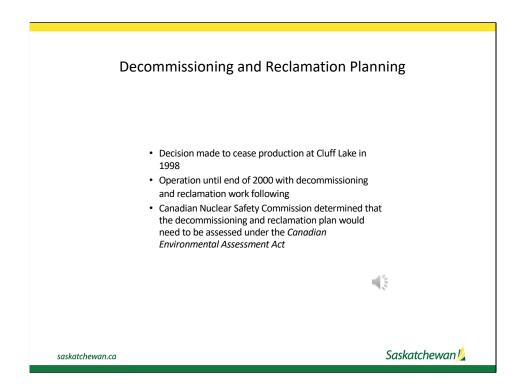


Throughout the construction and operation period, monitoring of environmental effects was key to regulatory oversight. Comparisons to baseline data helped determine effects levels and fed into plans for remedial work. The company measured effluent and emission releases and compared those to regulatory standards to ensure compliance was being maintained and that effects were still within the scope of assessment predictions.

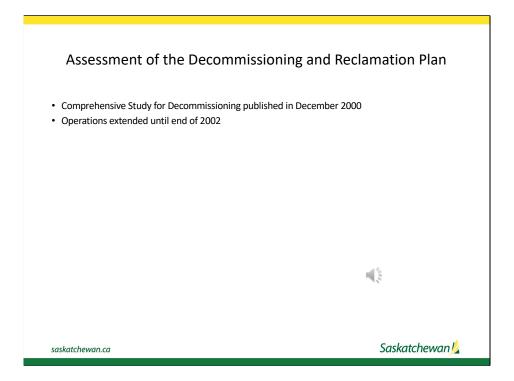


Along the way, other uranium mine development was assessed and evaluated. The 1990's saw some substantial new mines being proposed and some significant expansion projects at existing mines being contemplated. This proposed increase in mine activity lead to increased scrutiny of the industry and in the mid 1990's, a joint federal/provincial panel was established to examine the implications of this development. The panel resulted in many recommendations for consideration of the regulators and affected stakeholders. Key to these recommendations were that decommissioning and reclamation requirements be provided for in legislation and that the planning for decommissioning and reclamation include cost estimates for financial assurances. Financial assurances were a major regulatory enhancement and provided insulation for taxpayers from the issues seen with some projects that were undertaken before these things were considered.

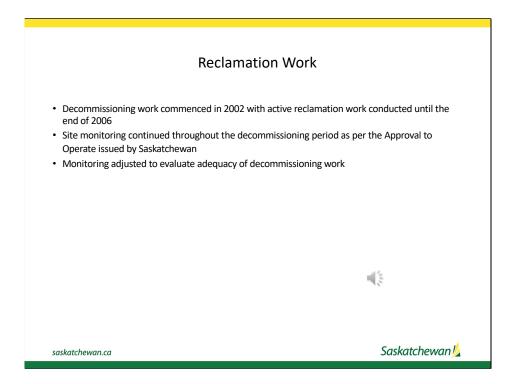
With this backdrop, we can see how decommissioning and reclamation planning was an important component in the regulation of the Cluff Lake project right from the initial contemplation of the development.



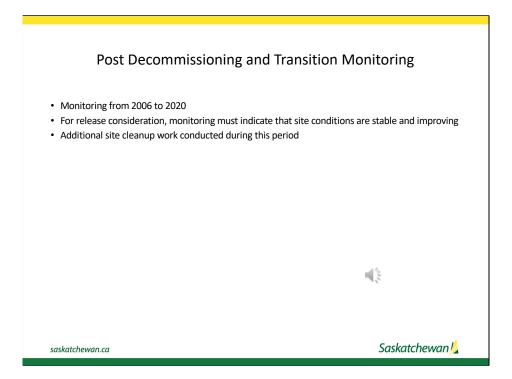
As a result of depressed uranium prices and the increased costs to the continued operation of the Cluff Lake Project, in 1998 a decision was made to cease production and close the mine at the end of 2000. Although the project had an approved decommissioning and reclamation plan, the Canadian Nuclear Safety Commission determined that an assessment of that plan would be required before it could be reaffirmed. Hence a comprehensive study under the Canadian Environmental Assessment act was undertaken.



The comprehensive study was published and presented in December 2000. Much of the work that was described in the decommissioning and reclamation plan was confirmed and the company began scheduling the reclamation work. While the reviews were being undertaken, the company extended the operational life of the mine and mill until the end of 2002.



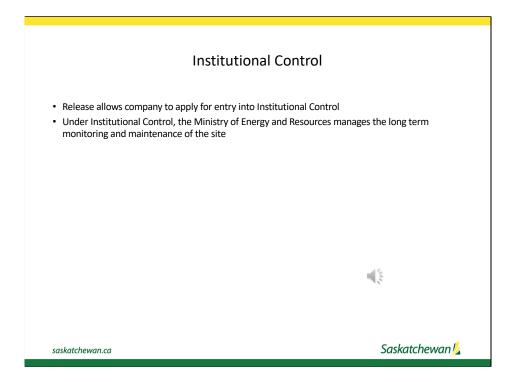
The bulk of the active decommissioning and reclamation work was conducted from the end of 2002 to the end of 2006. The province maintained the Approval to Operate for the project throughout the decommissioning work in the same manner that it used the approval to regulate the project during operations. Site facilities for managing effluent and emission discharges were maintained until they were no longer required and they themselves were decommissioned.



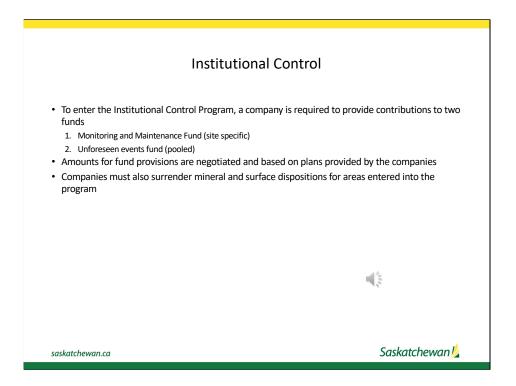
Monitoring programs were maintained throughout decommissioning and reclamation and then extended into the post decommissioning period to determine the suitability of the decommissioning work. Criteria for release from decommissioning and reclamation requirements in contingent on site conditions being stable and improving. Where need was indicated, additional site cleanup work was completed. Scheduled reporting as required by provincial approvals continued throughout the post decommissioning monitoring period.



In September 2022, the company submitted the site end state report, which form the basis for the company's request for release from decommissioning and reclamation requirements. This document described the work undertaken to meet the decommissioning and reclamation plan requirements and to get the site into a state where the environmental conditions were stable and improving. The information underwent review by both the province and the CNSC. The CNSC established that the work undertaken met requirements and exempted the site from licensing requirements under the *Nuclear Safety and Control Act* on May 10, 2023. This exemption is a requirement for the site to be considered for entry into the Saskatchewan Institutional Control Program as described in *The Reclaimed Industrial Sites Act*. The provincial review also established that the work met requirements and a Release from Decommissioning and Reclamation Requirements as per *The Mineral Industry Environmental Protection Regulations* was issued September 5, 2023.



In Saskatchewan, sites on provincial Crown land, once released from decommissioning and reclamation requirements, can apply for entry into the Institutional Control Program. The Institutional Control Program was established by Saskatchewan to provide a means for the company to relinquish responsibility for a reclaimed site so long as certain conditions are met. The Ministry of Energy and Resources then maintains the site and ensures that ongoing monitoring and maintenance work is conducted.



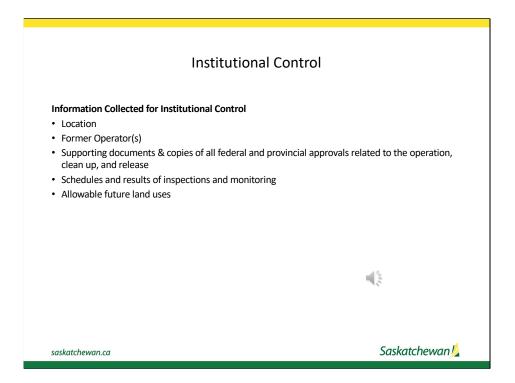
In order for a site to be considered for institutional control, the company must have obtained a release from the Ministry of Environment. For uranium, the site must also be exempted from licensing requirements from the Canadian Nuclear Safety Commission. The company must provide a plan and funds to ensure ongoing monitoring and maintenance work and contingency for potential unforeseen events. The company must also surrender the mineral and surface dispositions for the areas that will be entered into the program.



Funds for institutional control are provided entirely by the company. The Ministry of Energy and Resources and the Ministry of Environment review the monitoring and maintenance plan developed by the company to ensure that it meets requirements. The plan is cost estimated and future projected and once agreement on the amount is reached, the company provides funds to the Ministry of Energy and Resources. The Monitoring and Maintenance Fund is used to conduct monitoring work, publish reports, and provide scheduled maintenance as per the plan. Companies also contribute to a pooled fund that is intended to provide for coverage of unforeseen events. Recently, provisions of funds have also been included to cover future stakeholder engagement.



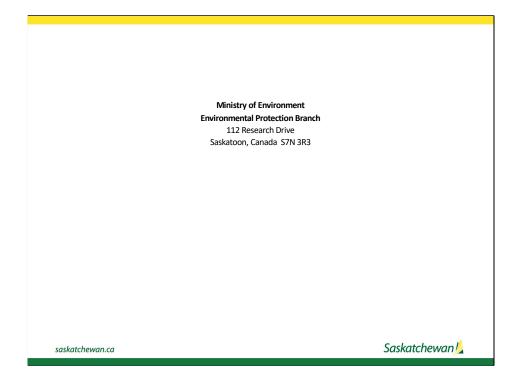
Once a site is accepted into Institutional Control, the Ministry of Energy and Resources maintains the site and a registry of all the information available on the site for a permanent record. The Ministry Of Energy and Resources also acquires the mineral and surface access rights to the site so that it can manage any future site access and activities. The Ministry of Environment maintains regulatory oversight of all properties in Institutional Control and assists the Ministry of Energy and Resources with monitoring report reviews and recommended follow up work where required.



Information collected for institutional control includes: location of the sites, former operators, supporting documents & copies of all federal and provincial approvals related to the operation, clean up, and release of the site, the schedules and results of inspections and monitoring, and notes regarding allowable future land uses.



The institutional control registry will: commission and supervise property monitoring and maintenance work, ensure information on the site is available for public access, oversee the management of the Institutional Control Management Fund, and prepare and issue an Annual Report on the program.



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