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March 6, 2023

Dr. Marcos A. Orellana
Special Rapporteur on Toxics and Human Rights
United Nations Human Rights Council

VIA EMAIL: hrc-sr-toxicshr@un.org

Dear Dr. Orellana:

RE: Submission for Special Rapporteur’s thematic report on detoxification/decarbonization

Cameco Corporation (Cameco) welcomes the opportunity to provide examples of ‘good practices and lessons learned on preventing toxic pollution that can result from producing, using, or preventing waste from climate change technologies’ as part of the call for input to your thematic report on detoxification/decarbonization.

Cameco is one of the largest global providers of the uranium fuel needed to energize a clean air world. We have controlling ownership of the world’s largest high-grade uranium reserves and low-cost mining operations in northern Saskatchewan, Canada and in the western United States (Wyoming and South Dakota). We are also a leading supplier of uranium refining, conversion, and fuel manufacturing services, operating these facilities out of Ontario, Canada. Additionally, we are a minority owner and non-operator of JV Inkai in Kazakhstan. Utilities around the world rely on Cameco’s nuclear fuel products to generate safe, carbon-free, affordable, baseload nuclear power.

We recognize the important role our company plays in enabling the vast reductions in global greenhouse gas emissions required to achieve a resilient net-zero carbon economy. We support climate action that is consistent with the ambition of the Paris Agreement and the Canadian government’s commitment to the agreement.

Cameco embraces our responsibility to manage our operational activities, and those of our partners like JV Inkai, with care for the protection of environmental resources and alignment with our core value of integrity. For example, the Eastern Athabasca Regional Monitoring Program (EARMP), established in 2011, is a partnership between the Government of Saskatchewan, Cameco, Orano, the communities of Black Lake Dēnesųhné First Nation, Fond du Lac Dēnesųhné First Nation, Hatchet Lake Dēnesųhné First Nation, Stony Rapids, Wollaston Lake, Camsell Portage and Uranium City, and the Canadian Nuclear Safety Commission (CNSC). This collaboration has been a testament to how government and industry can work with local communities to ensure a safe and secure environment. Program results, released in January 2023, show water and traditional foods in the Athabasca Basin have remained a safe and healthy part of the local diet for the last ten years. To read the full report visit earmp.ca.

For additional examples of our safe and ethical practices we urge the Special Rapporteur to review our 2021 Environmental, Social and Governance (ESG) Report. For your ease of reference, we have also attached a hard copy of the report. Key highlights from our report that may be of interest are indicated below:

Environmental protection and stewardship at Cameco are guided by a rigorous policy and programs designed to minimize our impacts on air, land, and water and to safeguard the biodiversity of surrounding ecosystems.

- See pages 32-35 for a discussion of our water management practices.
- See pages 36-42 for a discussion of our tailings and mining waste management practices, which align with the Mining Association of Canada's [Towards Sustainable Mining Tailings Management Protocol](#) and are independently reviewed on an annual basis.
- For an overview of Canada's plan for the safe long-term storage of used nuclear fuel waste please visit the [Nuclear Waste Management Organization](#) website.
- See pages 43-45 for a discussion of our greenhouse gas and energy management practices. Additionally, pages 33-34 in our [Management's discussion and analysis \(MD&A\) report](#) dated February 9, 2023 for a discussion our commitment to being an active and constructive partner in the fight against climate change.
- See pages 49-50 for a discussion of our operational decommissioning and closure plans. Cameco is required by regulation to develop and maintain preliminary decommissioning plans for all our mines and fuel services facilities as well as ensure we have financial assurances, in the forms of letters of credit or surety bonds, in place to cover the costs of carrying out these plans in the future.

Cameco believes respectful, strong, and mutually beneficial relationships with our workforce, Indigenous Peoples, and local communities are fundamental to our success.

- See pages 52- 56 for details regarding our relationships with Indigenous Peoples and local communities near our operations and our company-wide Code of Conduct and Ethics.
- See pages 57-60 for a discussion of our core value of safety, and how we use this to guide all decision making throughout the design and operation of our facilities.
- See pages 61-64 for details regarding the robust nuclear safeguards we have in place, in alignment with our national and international licenses, permits, and regulations.
 - Our product packaging meets the rigorous requirements found in the CNSC [Packaging and Transport of Nuclear Substances Regulations](#), which are based on the International Atomic Energy Agency (IAEA) *Regulations for the Safe Transport of Radioactive Material*. At our Port Hope conversion facility uranium hexafluoride (UF₆) is filled as a liquid and turns solid in a specially designed cylinder. The cylinders are then placed on a cradle system on top of a specialized sea container (flat rack) or trailer for transport.
 - When working with hazardous chemicals, such as UF₆ and fluorine gas, we utilize a defence-in-depth approach to protect our workforce and the public. This starts with the specialized design of our facilities and systems (the first layer) and extends through multiple controls to the last layer of defence, which is emergency response.

We would also offer that the operator of our JV Inkai follows Kazakhstan's regulations on radiation protection, which closely align with international practices from the IAEA and International Commission on Radiological Protection (ICRP). A core part of the international system of radiation protection is the concept of keeping radiation doses As Low As Reasonably Achievable, societal and economic factors considered, i.e., the ALARA Principle. JV Inkai's approach to radiation

protection has incorporated this principle and, as a result radiation doses, at JV Inkai are low and in-line with other uranium operations internationally.

Cameco supports the intent of the Special Rapporteur's thematic report on detoxification/decarbonization. We agree that a successful transition to a low carbon economy and energy sector requires all decarbonization technologies to develop and integrate strategies that support the continued safety, integrity, and wellbeing of the surrounding environment and communities. We believe we have offered sufficient evidence that Cameco maintains the necessary mature and effective policies and programs across our nuclear energy value chain to do just that.

Sincerely,



R. Liam Mooney
Vice President
Safety, Health, Environment, Quality and Regulatory Relations
Cameco Corporation

RS:kbw

c: Cameco: K. England, K. Bruce-Welsch, Regulatory Records