



CANADIAN
NUCLEAR
WORKERS' COUNCIL

Canadian Nuclear Workers' Council

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November 12, 2019

Louise Levert
Secretariat
Canadian Nuclear Safety Commission
280 Slater St. P.O. Box 1046
Ottawa, Ontario
K1P 5S9

Ms. Levert:

Re: Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2018

Please include this submission for the December 11, 2019 meeting of the Commission.

The Canadian Nuclear Workers Council (CNWC) is an umbrella organization of Unions representing workers in all sectors of the Canadian nuclear industry. It is ***the collective voice of organized labour in the Canada's Nuclear Industries.***

The CNWC is in full support of the annual assessment process. It should be noted that the presence of the Unions in these workplaces provides another level of oversight for the issues assessed in these reports.

The CNWC has reviewed the CNSC Staff's Oversight Report for Uranium Mines, Mills, in Canada: 2018 with our member Unions at the facilities listed below.

- **Cameco McArthur River Uranium Mine** – United Steel Workers (USW) Local 8914
- **Cameco Key Lake Mill** USW Local 8914
- **Orano Mclean Lake Mill** – UNIFOR 48 S

The Canadian Nuclear Workers' Council is comprised of Locals of the following unions: Canadian Union of Public Employees, International Association of Firefighters, International Association of Machinists & Aerospace Workers, International Brotherhood of Electrical Workers, and Power Workers' Union, Professional Institute of the Public Service, Society of Energy Professionals, United Steelworkers, and Union for Canada (UNIFOR), Union of Professional Engineers and Associates. & the following organizations: Grey Bruce Labour Council, Northumberland Labour Council, Durham Region Labour Council, & the Ontario Building and Construction Trades Council.

The CNWC believes that if the workplace is safe then the public is also safe... All of the Unions at these sites take worker safety and the environment very seriously and they work with their employers to continuously improve safety.

All of these facilities have joint health and safety committees (JHSC) where the unions appoint the worker representatives. These unions all have additional provisions in their collective agreements for Health & Safety that exceeds legislative provisions. Union health and safety representatives inspect their workplaces on a regular basis and are in contact with workers on a daily. This, plus additional provisions that apply to union representatives, ensures that any health and safety issues is addressed and resolved promptly. Workers are encouraged to report any safety issues and have the right to refuse unsafe work.

Both the USW and UNIFOR National Unions have safety professionals on staff which can assist the local unions with safety concerns if necessary. Both the CNSC and Saskatchewan Labour inspectors interact with USW & UNIFOR health and safety representatives during their site visits.

Over the years the CNWC Annual Conference has been held in Saskatoon on several occasions. Delegates were able to visit the Cameco McArthur River Mine, the Key Lake Mill as well as the MacLean Lake Mill Delegates were able to see firsthand how worker safety, environmental controls, etc are managed at these sites.

These visits plus the annual reports provided at our annual conference by UNIFOR & USW representatives has ensured the CNWC that these site are operated safely.

The workplace safety performance at these facilities as identified in the CNSC Staff's oversight report and confirmed by our member Unions is exemplary

We note that all sites received a satisfactory rating for worker safety. The CNWC believes that continuous improvement has to be part of safety programs. We look forward to these facilities being rated as fully satisfactory in this area in the future.

The CNWC concurs with the CNSC Staff's conclusions:

- That McArthur River Uranium Mine, Key Lake Mill, & Mclean Lake Mill were operated safely during 2018.
- that each of the above sites covered by this report made adequate provision for the health and safety of the workers, the protection of the public and the environment, and Canada's international obligations.

Respectfully Submitted

David Shier
National Director