Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

**CMD 25-H12.31**

Date: 2025-01-09

# Written Submission from Métis Nation - Saskatchewan

# Mémoire de la Nation métisse de la Saskatchewan

In the matter of

À l'égard de

**NexGen Energy Ltd.**

**NexGen Energy Ltd.**

License application to prepare a site for and construct its Rook I uranium mine and mill project

Demande de permis concernant la préparation de l'emplacement et la construction de son projet de mine et d'usine de concentration d'uranium Rook I

**Commission Public Hearing**

**Audience publique de la Commission**

February 2026

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Canada

Métis Nation – Saskatchewan
310 20th Street East,
Saskatoon, SK S7K 0A7

January 9, 2026

Hilary Hunter
Canadian Nuclear Safety Commission

**Project:** NexGen Energy Ltd.'s Rook I Project

**Subject:** Métis Nation – Supporting Written Intervention for the Rook I Project and Environmental Impact Statement Evaluation

Dear Hilary,

Métis Nation – Saskatchewan Northern Region 2, in collaboration with the Métis Nation – Saskatchewan (collectively, the Métis Nation), confirm our consent and support for NexGen Energy Ltd.'s (NexGen) Rook I Project (Project). The Métis Nation and NexGen engaged early and often regarding the Project, and the parties' relationship with respect to the Project was formalized in June 2023 with the signing of an Impact Benefit Agreement (IBA).

The Métis Nation and NexGen have been engaging since 2013 on all aspects of the Project. The parties signed a Study Agreement in 2019 that formalized a collaborative engagement process as the Environmental Assessment (EA) for the Project was undertaken, including funding for the Métis Nation to complete a self-directed Traditional Land Use Study, and the formation of a Joint Working Group (JWG) to support the inclusion of Métis knowledge into the EA. The Study Agreement was superseded by the IBA, which considers the entire lifecycle of the Project.

The IBA was negotiated and drafted by the Métis Nation and NexGen, including through the involvement of the parties' respective leadership, legal, and third-party subject matter experts, while consultation and community engagement with Métis Nation citizens was conducted in conjunction. The IBA incorporates accommodation measures for the Project's impacts on the Métis Nation's rights and provides for NexGen's commitment to social programs for Métis Nation citizens. The IBA includes mechanisms to facilitate NexGen's ongoing engagement with the Métis Nation on environmental and social concerns, to support the Métis Nation and Métis Nation citizens' access to business and employment opportunities for the Project, and to support the Métis Nation in its engagement with

federal and provincial bodies and its involvement in Project-related environmental programs.

The Métis Nation participated in both the provincial and federal regulatory processes for the Project, including by participating on the Federal-Indigenous Review Team (FIRT) with Canadian Nuclear Safety Commission (CNSC) staff to review the draft Environmental Impact Statement (EIS) for the Project, and by submitting additional comments through the federal public comment period for the draft EIS. As per letters submitted to CNSC staff on December 5, 2023 and November 4, 2024, the Métis Nation confirmed our acceptance of both NexGen's responses to the Métis Nation's FIRT information requests, and to the public comments, respectively. Whenever possible, the Métis Nation worked directly with NexGen to discuss and address the Métis Nation's comments, issues, and interests on the Project, including working directly with NexGen on the issues and concerns validation through the joint Environmental Committee.

An additional letter was sent to CNSC staff on January 23, 2024 confirming that the Métis Nation accepted the manner in which NexGen addressed or responded to issues and concerns raised during the EA process. This letter confirmed that that all issues and concerns that could be addressed at that time had been resolved, and for issues and concerns that can only be addressed during the Project's lifespan, NexGen and the Métis Nation have developed the necessary approaches and methods to address those issues and concerns at the appropriate time in the future.

In support of the Commission's hearing process, the Métis Nation retained Two Worlds Consulting (TWC) to prepare the attached evaluation of the final EIS (FEIS) for the Project. This report summarizes how NexGen has addressed, or plans to address, Project-related issues and interests identified by the Métis Nation to date. TWC reviewed the FEIS against the outstanding issues and concerns summarized by the CNSC in the *CMD 25-H12 NexGen Energy Ltd. Application for a Licence to Prepare Site and Construct the Rook I Uranium Mine and Mill report* (October 2025).

The Métis Nation are confident that NexGen has addressed Métis issues and concerns, and that the IBA's mechanisms and processes, including the Environmental Committee and Implementation Committee processes, will enable the tailoring of monitoring to reflect Métis interests. The Métis Nation is also confident that should any future issues and concerns arise during the Project's lifespan, these mechanisms and processes will be adequate to generate new mitigations and commitments as part of the adaptive management framework.

The Métis Nation, in partnership with NexGen, have developed a collaborative and transparent approach to engagement that has resulted in a strong relationship between the parties, as together we advance the Rook I Project with the highest safety and

environmental standards. The Métis Nation have full confidence that NexGen will deliver this much-needed Project with the oversight and support from the Métis peoples.

In conclusion, the Métis Nation confirm that we have been adequately consulted and engaged by the CNSC on the Rook I Project, and that NexGen has fulfilled their procedural aspects related to consultation that was assigned by the CNSC. The Métis Nation provide our consent and support for the Project, and we look forward to setting a new path forward in the way of Indigenous resource development.

Sincerely,

Brent Laroque
Director of Environment

TWO WORLDS
CONSULTING

GUIDANCE WITH INTEGRITY.

# Final Environmental Impact Statement Technical Evaluation Report

NexGen's Rook I Project
January 2026
Project Number: 400.07

# Contents



## Tables

# Executive Summary

NexGen Energy Ltd. (NexGen) is proposing to build, operate, and decommission the Rook I Project (Project), an underground uranium mine and milling operation with an anticipated life of 43 years. The Project is located in the Métis Homeland of northern Saskatchewan, on the Patterson Lake Peninsula, approximately 130 kilometres north of La Loche, Saskatchewan, in Métis Nation – Saskatchewan (MN-S) Northern Region 2 (NR2). The Project is subject to a cooperative assessment under the *Canadian Environmental Assessment Act, 2012* (S.C. 2012) and *The Environmental Assessment Act* (2018, c. 42) of Saskatchewan, administered by the Canadian Nuclear Safety Commission (CNSC) and the Saskatchewan Ministry of Environment, Environmental Assessment and Stewardship Branch respectively. NR2, in collaboration with the MN-S (collectively, the Métis Nation), has been working collaboratively with NexGen since 2013. The Métis Nation submitted comments on the draft Environmental Impact Statement in the fall of 2022 and have since collaborated with NexGen to resolve Métis issues and interests related to the Project.

This report was prepared by Two Worlds Consulting on behalf of the Métis Nation and summarizes how outstanding Métis Project-related issues and interests have been or will be addressed in partnership with NexGen.

# 1.0 Introduction

NexGen Energy Ltd. (NexGen) is proposing to build, operate, and decommission the Rook I Project, an underground uranium mine and milling operation with an anticipated life of 43 years. The Project is located in the Métis Homeland of northern Saskatchewan, on the Patterson Lake Peninsula, approximately 130 kilometres north of La Loche, Saskatchewan, in Métis Nation – Saskatchewan (MN-S) Northern Region 2 (NR2). The Project is subject to a cooperative assessment under the *Canadian Environmental Assessment Act, 2012* (S.C. 2012) and *The Environmental Assessment Act* (2018, c. 42) of Saskatchewan, administered by the Saskatchewan Ministry of Environment, Environmental Assessment and Stewardship Branch. NexGen will also require a licence from the Canadian Nuclear Safety Commission (CNSC) under the *Nuclear Safety and Control Act* (2017 C.9) prior to Project construction.

NR2, in collaboration with the MN-S (collectively, the Métis Nation), has been working collaboratively with NexGen since 2013. The Métis Nation submitted comments on the draft Environmental Impact Statement in the fall of 2022 and have since collaborated with NexGen to resolve Métis issues and interests related to the Project and achieve an Impact Benefits Agreement in 2023.

This report was prepared by Two Worlds Consulting on behalf of the Métis Nation, and summarizes how Métis Project-related issues and interests have been or will be addressed in partnership with NexGen.

# 2.0 Issue and Interest Assessment Approach

Two Worlds Consulting reviewed the Métis issues and interests related to the Project against commitments made in the final EIS and the Federal Commitments Report prepared by NexGen (**Appendix A**). Table 4-1 presents a CNSC summary (**Appendix B**) of Métis Project-related issues and interests, organized by Valued Component (VC) or key topic, NexGen's response to issues and interests, mitigations and commitments made by NexGen in the EIS and/or Federal Commitments Report, and a resolution status of each issue and interest, from the Métis Nation's perspective.

Documents that were reviewed to support the development of this report:

- CNSC's *Environmental Assessment Report: Rook I Project* (September 2025)
- CNSC's *CMD 25-H12 NexGen Energy Ltd. Application for a Licence to Prepare Site and Construct the Rook I Uranium Mine and Mill* report (October 2025)
- NexGen's *Consolidated Comments from Indigenous Nations and Communities and the Public on the NexGen Rook I Project Draft EIS (For NexGen Response)* document (November 2024)
- NexGen's *Rook I Project: Federal Commitments Report* (April 2024)
- NexGen*'s NexGen Rook I Project Environmental Impact Statement* (November 2024)
- The Métis Nation's *NR2, MN-S, and NexGen Partners in the Rook I Project* presentation
- Two Worlds Consulting's *NexGen Rook I Project: NexGen Joint Working Group Issues and Concerns Summary Table – Technical Review Comparison* memorandum (June 2023)

# 3.0 Ongoing Engagement Between NexGen and the Métis Nation

The Métis Nation have worked closely with NexGen through the early stages of the exploration and development of the Rook I Project. The Métis Nation will continue to engage collaboratively with NexGen to address Métis issues and interests related to the Project. Below is a list of the Métis Nation's engagement expectations, which have been collaboratively developed and defined between the Métis Nation and NexGen, and which will carry through the life of the Project:

- NexGen will continue to provide capacity funding to support the Métis Nation's involvement in Project-related engagement.
- NexGen will continue to provide opportunities for the Métis Nation to be involved in Project decision-making, including decision-making related to monitoring and adaptive management (e.g., through the Implementation Committee and the Environmental Committee established under the Impact Benefit Agreement).
- NexGen and the Métis Nation will continue to implement consent-seeking practices to protect Métis Rights and interests (e.g., NexGen will seek the Métis Nation's consent on reclamation, decommissioning, and post-decommissioning).
- NexGen and the Métis Nation will continue leading the path to Truth and Reconciliation Call to Action #92.
- NexGen and the Métis Nation will continue to be collaborative and respectful partners that support a mutually beneficial relationship.

According to the final EIS, NexGen acknowledges the importance of addressing the Métis Nation's issues and concerns and is committed to continuing to listen to, respond to, and where possible, address all issues and concerns raised during the Project's lifespan. The final EIS also confirms that outcomes from future discussions between NexGen and the Métis Nation regarding the Métis Nation's issues and concerns will be documented in subsequent Indigenous Engagement Report updates, as required (NexGen Energy Ltd. 2024a, 186). NexGen has provided a framework under the Impact Benefit Agreement to address any future Métis issues and concerns that may arise during the Project's lifespan.

Table 3-1 outlines commitments made by NexGen in the Federal Commitments Report that require further engagement with Indigenous groups, including the Métis Nation. NexGen has established Indigenous group-specific Environmental Committees and the Implementation Committees that are part of each Benefit Agreement (NexGen Energy Ltd. 2024a, 153), and will be the primary vehicles to resolve concerns and interests that arise during the Project's lifespan.

**Table 3-1: Indigenous-specific Project Commitments**

| Topic | Project Commitment Made by NexGen | Indigenous Involvement Identified by NexGen |
|---|---|---|
| **Engagement** | Implement an Indigenous and Public Engagement Program that includes "sharing monitoring results with local communities, engagement of trappers and Indigenous land users to share Project information and address any issues as they arise, and sharing of environmental monitoring results with local communities" (NexGen Energy Ltd. 2024b, 10) | Indigenous communities, trappers, and land users |
| | Implement a Benefits Agreement inclusive of provisions related to culture, traditional values, employment, training, and economic development (NexGen Energy Ltd. 2024b, 35). | Primary Indigenous groups identified by NexGen, including the Métis Nation |
| | Work with Indigenous communities to develop fishing policies that, "consider both fisheries protection and traditional use activities" (NexGen Energy Ltd. 2024b, 26) | Indigenous communities |
| **Community Health and Wellbeing** | "Work with local Indigenous Groups and communities to develop and implement a community well-being monitoring program that addresses the various elements that make up community well-being. The specific indicators would be developed in consultation with Indigenous Groups and stakeholders (NexGen Energy Ltd. 2024b, 43) | Indigenous groups |
| | Work with local Indigenous Groups in an effort to complete a targeted Traditional Foods study to help validate or modify the dietary assumptions made in the human health risk assessment (NexGen Energy Ltd. 2024b, 42) | Indigenous groups |
| | Develop and issue a perception survey questionnaire, developed with input from Indigenous Groups (NexGen Energy Ltd. 2024b, 38). | Indigenous groups |
| **Socio-economics** | Include employment representation by Indigenous identity in the Mining Operations Report to be shared with the Province (NexGen Energy Ltd. 2024b, 43). | Not specified |
| | "Support and promote Indigenous community participation and employment in the traditional economy" (NexGen Energy Ltd. 2024b, 36). | Not specified |
| | "Pre-qualify each Indigenous business listed in the business registry and provide feedback to any Indigenous business that does not successfully pre-qualify" (NexGen Energy Ltd. 2024b, 35). | Indigenous businesses |
| | "Develop and maintain a business opportunities workplan that describes the steps NexGen and each primary Indigenous Group would take to achieve the desired outcomes of the respective Benefit Agreement" (NexGen Energy Ltd. 2024b, 35). | Primary Indigenous groups identified by NexGen, including the Métis Nation |
| **Land and Resource Use** | Establish a Project feedback and grievance mechanism to "record and action issues identified by local priority area residents. Indigenous land and resource use issues would be tracked and addressed as they arise and periodically analysed through management reviews" (NexGen Energy Ltd. 2024b, 42). | Local priority area residents |
| | Meet regularly with Indigenous land users (independently and through the Indigenous and Public Engagement Program) "to review the previous season and understand any issues or concerns that could be addressed" and conduct necessary follow up (NexGen Energy Ltd. 2024b, 42). | Indigenous land users |
| | Work with Indigenous land users to maintain access to areas of importance (NexGen Energy Ltd. 2024b, 10). | Indigenous land users |
| **Monitoring and Adaptative Management** | Establish an Environmental Committee to monitor the environmental performance of the Project with each Indigenous Group (NexGen Energy Ltd. 2024b). | Primary Indigenous groups identified by NexGen, including the Métis Nation |
| | Engage Indigenous communities in the development of the Caribou Mitigation and Offsetting Plan and in a Fish and Fish Habitat Offsetting Plan, if required by the Department of Fisheries and Oceans Canada (NexGen Energy Ltd. 2024b, 24 and 42). | Primary Indigenous groups identified by NexGen, including the Métis Nation |
| | "Establish an Implementation Committee to provide a forum for regular communication and information exchange between NexGen and communities for effective management of the Benefit Agreement commitments and for the early resolution of issues and/or disputes that may arise" with each Indigenous Group (NexGen Energy Ltd. 2024b, 35). | Primary Indigenous groups identified by NexGen, including the Métis Nation |
| | Provide "funding for full-time independent Indigenous Monitors to enable unrestricted environmental monitoring, subject to the Indigenous Monitor complying with appropriate health safety and other reasonable site-specific requirements" (NexGen Energy Ltd. 2024b, 35). | Primary Indigenous groups identified by NexGen, including the Métis Nation |

# 4.0 Métis Issue and Interest Assessment

Table 4-1 lists Project-related issues and concerns raised by the Métis Nation to date and summarized by the CNSC, NexGen's response to raised issues and concerns, mitigation and commitments proposed and/or implemented by NexGen to address issues and concerns, and the resolution status of these issues and concerns.

Based on our review, the mitigations and commitments in Table 4-1 provide a framework for NexGen and the Métis Nation to resolve concerns and interests that can only be addressed during the Project's lifespan. As such, there are no outstanding issues or interests that require further mitigation at this time.

**Table 4-1: Métis Project-related Issues and Interests Resolution**

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
|---|---|---|---|---|---|
| **Air Quality, Noise, and Climate Change Issues and Interests (FEIS Section 7)** | | | | | |
| Métis Nation recommended that all objectives for screening against Ambient Air Quality Objectives (AAQO) be entirely health-based. | NexGen has maintained that the ambient air quality criteria selected for the air quality screening of COPCs are appropriate. NexGen used a precautionary approach for screening COPCs, following standard best practices for human health risk assessments (HHRAs). The criteria used in the HHRA were in accordance with current science and regulatory requirements, and NexGen has stated no additional consideration of guidelines is required for the final Environmental Impact Statement (FEIS) (Canadian Nuclear Safety Commission 2025, 205). | - Primarily use liquified natural gas, which generates lower emissions per unit of energy produced than diesel, for on-site power generation.<br>- Evaluate opportunities to reduce fuel combustion requirements of infrastructure and equipment, to the extent practical, during detailed design.<br>- Optimize haul routes to reduce fuel consumption and emissions from equipment.<br>- Recover heat from the liquified natural gas power plant exhaust and use to heat other process and ancillary buildings, to the extent practical.<br>- Use pollution control technology on process plant exhaust stacks with preventative maintenance and stack testing, as well as adaptive management, if necessary.<br>- Use Tier 4 diesel mobile equipment for underground operations, whenever practical, with applicable mine ventilation airflow rates specified by Canada Centre for Mineral and Energy Technology, when available.<br>- Apply water and/or suppressants to site roads, access road, and airstrip, as necessary. Use dust suppressants that minimize environmental risk and are government-approved for use.<br>- Limit idling of vehicles and equipment to the extent practical.<br>- Limit vehicle speed on unpaved site roads to reduce fugitive dust during Construction and Operations.<br>- Develop a site-specific effluent treatment plant to treat constituents of potential concern to appropriate release limits in accordance with provincial standards and licence/permit conditions.<br>- Collect, store, and routinely monitor contact water to confirm discharge water meets water quality criteria appropriate for release.<br>- Monitor treated effluent flow and quality.<br>- Treat sewage to appropriate release limits in accordance with provincial standards and licence/permit conditions.<br>- Monitor treated sewage flow and quality.<br>- Use engineered cemented paste backfill and tailings to control source concentrations.<br>- Install engineered cover system on potentially acid generating and non-potentially acid generating waste rock storage areas.<br>- Implement a Project-specific Environmental Protection Program.<br>- Implement a Project-specific Environmental Monitoring Plan that includes ambient air monitoring. | - Implement an Indigenous and Public Engagement program.<br>- Establish an Environmental Committee to monitor environmental performance of the Project. | - Implement a Project-specific Effluent and Emissions Plan.<br>- Use and maintain emissions control devices on combustion-based equipment.<br>- Identify and implement procurement criteria to confirm stationary and mobile engines meet applicable performance standards.<br>- Maintain mobile mining equipment and vehicles and operate the equipment within parameters for engine exhaust system design.<br>- Conduct regular equipment maintenance.<br>- Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise. | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation recommended that all constituents of potential concerns (COPCs) acting within a non-threshold level of toxicity be included for further assessment, regardless of whether they exceed AAQOs. | | | | | |
| Métis Nation emphasized that intermediate components, such as air, should be considered and discussed within the EIS when selecting boundaries for Indigenous land and resource use. | NexGen has confirmed that the information requested was considered when defining the spatial boundaries for assessment and is provided in Draft EIS Section 16. The definition of the local study area and regional study area for the Indigenous land and resource use valued component were defined to include predicted effect on supporting intermediate components (Canadian Nuclear Safety Commission 2025, 205). | | | | |
| Métis Nation asked if the Environmental Risk Assessment (ERA) reflects Métis Knowledge that demonstrates that air quality is extremely high in the Study Area, rather than those already impacted by activity. | | | | | |
| Métis Nation questioned why short-term exposures to air quality pollutants were not included in the HHRA. | NexGen has maintained that further quantitative assessments for nitrogen dioxide, particulate matter, and uranium are not required as the screening assessments showed that only minor, short-term, reversible effects to human health could potentially occur. NexGen has committed to implementing a monitoring program to measure ambient air concentrations to maintain human health (Canadian Nuclear Safety Commission 2025, 205). | | | | |
| **Surface Water Quality and Sediment Quality (EIS Section 10)** | | | | | |
| Métis Nation identified concerns with how NexGen was selecting COPCs for their environmental risk assessment. | NexGen confirmed that end-of-pipe concentrations of COPCs are predicted to be higher than the chronic Project threshold, but below acute toxicity levels for fish and has | Not applicable. | Not applicable. | - Implement a Project-specific Environmental Monitoring Plan that includes monitoring for | Status: **Resolved** – Issues and interests have been addressed by the identified |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
|---|---|---|---|---|---|
| Métis Nation indicated that it was unclear if COPCs that exceeded water quality objectives at end-of-pipe treatment, but met water quality objectives in the mixing zone were excluded from further assessment.<br><br>Métis Nation made it clear that using dilution in surface water as part of their ecological risk assessment was not best practice.<br><br>Métis Nation also expressed concern that NexGen was relying on design criteria and road access management controls to mitigate any release of uranium or other COPCs from an accident near surface water bodies such as the Clearwater River.<br><br>Métis Nation asked how NexGen will monitor aquatic environments until decommissioning and asked NexGen to detail its environmental monitoring plan for aquatic species. | committed to developing a comprehensive monitoring plan including surface water quality. As acutely toxic COPCs would not be released to the environment, NexGen has maintained that their assessment, including the use of dilution, is appropriate. NexGen noted that to address increased road use and mitigate the release of COPCs from an accident, upgrades to existing access roads are planned. Finally, NexGen has clarified that the invasive species management plan will be developed during licensing (licence to prepare site and construct) (Canadian Nuclear Safety Commission 2025, 296). | | | hydrology, water quality, benthic invertebrates, fish, and wildlife.<br>- Implement a Project-specific Environmental Monitoring Plan that includes monitoring in the receiving environment in the vicinity of the Project, as required, in accordance with licence requirements and the federal Metal and Diamond Mining Effluent Regulations to monitor the potential effects of Project discharges on water and sediment quality, and on the fish population and benthic invertebrate community.<br>- Implement a Project-specific Effluent and Emissions Plan.<br>- Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project. | mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation indicated that whitefish is an inadequate fish to use to predict COPCs concentrations in sediments as they do not behave in the same manner as other fish species, such as Burbot, that may be potentially impacted due to COPC concentrations in sediment given they are more sedentary and move smaller distances. | NexGen noted that northern pike was selected to represent burbot as a primarily piscivorous benthic-dwelling fish in addition to lake whitefish. Additionally, NexGen completed an aquatic health assessment to evaluate the potential magnitude of effects on sensitive aquatic species, which showed that potential health effects on burbot would be minimal and within the range of variability observed in unexposed populations (Canadian Nuclear Safety Commission 2025, 264). | | | | |
| **Vegetation (FEIS Section 13)** | | | | | |
| Métis Nation noted that it was unknown if soils investigations were completed to describe soil characteristics in the Project study areas. | NexGen has confirmed that soil investigations were completed at a total of 118 sites (Canadian Nuclear Safety Commission 2025, 280). | - Establish and enforce speed limits on site and access roads to reduce dust production.<br>- Limit vehicle speed on unpaved site roads to reduce fugitive dust during Construction and Operations.<br>- Optimize haul routes to reduce fuel consumption and emissions from equipment.<br>- Limit total suspended particulate emissions during Construction by enforcing a 25 km/h speed limit for heavy equipment involved in material movement and earthworks on the mine / mill terrace. This speed limit does not apply to site road traffic or the haul route from the headworks to the waste rock piles.<br>- Apply water and/or suppressants to site roads, access road, and airstrip, as necessary. Use dust suppressants that minimize environmental risk and are government-approved for use.<br>- Implement a Project-specific Environmental Monitoring Plan that includes soil quality and ambient air monitoring.<br>- Implement a Project-specific Environmental Protection Program. | - Establish an Environmental Committee to monitor environmental performance of the Project.<br>- Provide funding for full-time independent Indigenous Monitors to enable unrestricted environmental monitoring, subject to the Indigenous Monitor complying with appropriate health and safety and other reasonable site-specific requirements. | - Implement a Project-specific Environmental Monitoring Plan that includes monitoring for soil quality to determine if Project activities (e.g., dust generation and other air particular generation) are influencing soil chemistry.<br>- Implement a Project-specific Effluent and Emissions Plan.<br>- Develop and implement a Preliminary Decommissioning and Reclamation Plan.<br>- Minimize areas of vegetation clearing and soil disturbance.<br>- Implement progressive reclamation and revegetation of disturbed areas no longer required.<br>- Reclaim and revegetate areas where non-permanent Project facilities have been decommissioned.<br>- Implement a Project-specific Environmental Protection Program, which includes actions to prevent, detect, and control areas with prohibited, noxious, and nuisance weed / invasive species (e.g., along the access road, airstrip, and loading or staging site), following best practice guidance.<br>- Mark clearly with an applicable set-back distance and avoid known rare plants, where feasible. Where disturbance to rare plants is unavoidable, compensation would be considered following discussion with and guidance from regulators. | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation noted concerns of Project-related dust and its potential impacts to vegetation as a pathway of effects to humans and wildlife. | NexGen updated the Final EIS Appendix 2B to provide key mitigation efforts for this pathway. NexGen has noted that secondary pathways, including fugitive dust and vegetation changes from particulates, are not expected to contribute to cumulative effects and cause minor changes relative to existing conditions or guideline values. Therefore, residual effects for secondary pathways have not been considered (Canadian Nuclear Safety Commission 2025, 280). | | | | |
| Métis Nation requested NexGen include results from supplemental vegetation inventory and rare plant surveys in the EIS. | NexGen has clarified that additional rare plant studies conducted in 2021 found no additional rare plant species, and therefore no update was required to the Draft EIS (Canadian Nuclear Safety Commission 2025, 281). | | | | |
| Métis Nation questioned the omission of lesser duckweed (Lemna minor), despite it being a provincially listed species observable within ecosite BP25. | NexGen has clarified that due to taxonomic changes, all Lemna minor observations in the project area have been changed to Lemna turionifera (Common Duckweed), a species that is not provincially tracked (Canadian Nuclear Safety Commission 2025, 281). | | | | |
| Métis Nation indicated a number of additional pathways, including secondary | NexGen updated the Final EIS Appendix 2B to provide key mitigation efforts for this pathway. NexGen has noted that secondary pathways, including fugitive dust and | | | | |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
|---|---|---|---|---|---|
| pathways, that should be considered concerning potential impacts to vegetation. | vegetation changes from particulates, are not expected to contribute to cumulative effects and cause minor changes relative to existing conditions or guideline values. Therefore, residual effects for secondary pathways have not been considered (Canadian Nuclear Safety Commission 2025, 280). | | | - Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project. | |
| Métis Nation noted a concern that the Environmental Monitoring Plan for vegetation was not identified. | NexGen confirmed that the development of environmental monitoring details for the Project would occur outside of the environmental assessment process, and involve engagement with primary Indigenous Nations and communities, including the Métis Nation. NexGen has stated that while all reasonable efforts will be made to reestablish vegetation communities representative of existing conditions, the terrain would have changed as a result of the Project and the effectiveness of such a reclamation is uncertain. NexGen has confirmed that surveys for non-vascular plants were not conducted as no plant species at risk or critical habitat, including lichen, were listed in the regional study area(Canadian Nuclear Safety Commission 2025, 281). | | | | |
| Métis Nation identified that reclamation activities should be completed such that vegetation communities present at the time of disturbance would be reestablished and also indicated it was not clear which vegetation species would be used for reclamation and asked NexGen to confirm the completion of surveys for non-vascular plants or lichen Species of Conservation Concern. | | | | | |
| **Hydrogeology and Hydrology (EIS Section 8 and Section 9)** | | | | | |
| Métis Nation noted a lack of clarity concerning cumulative impacts to groundwater from nearby future developments as groundwater drawdown from the Project activities is predicted to extend 2-4 kilometres from the Project site, but it is not evident if groundwater drawdown from a reasonably foreseeable future development case will overlap or cause additional impacts to NexGen's groundwater drawdown. | NexGen has noted that the simulated drawdown in the upper horizon does not overlap with the Patterson Lake South Project area, and overall Patterson Lake represents a strong boundary for the groundwater flow system, minimizing changes in groundwater elevation and flow directions. The total groundwater flow to Patterson Lake may be affected by the concurrent development of the two projects, however NexGen does not expect cumulative effects due to the collection, treatment and discharge of Project groundwater inflows to Patterson Lake mitigating reduction in baseflow. Furthermore, NexGen has confirmed that seepage pathways for the Project and Patterson Lake South Project will not overlap, therefore, groundwater affected by the two projects is not expected to interact in the groundwater environment (Canadian Nuclear Safety Commission 2025, 233). | - Collect, store, and routinely monitor contact water to confirm discharge water meets water quality criteria appropriate for release.<br>- Monitor treated effluent flow and quality.<br>- Treat sewage to appropriate release limits in accordance with provincial standards and licence/permit conditions.<br>Monitor treated sewage flow and quality.<br>- Implement a Project-specific Industrial Air Source Environmental Protection Plan.<br>- Implement Project-specific monitoring programs (e.g., Effluent Monitoring Plan, Environmental Monitoring Plan) that includes ambient air monitoring, surface water quality monitoring, sediment quality monitoring and adaptive management, if necessary.<br>- Implement a Project-specific Environmental Protection Program.<br>- Implement Groundwater Protection and Monitoring Plan.<br>- Implement a Project-specific Mine Waste Management Plan and site water management procedures. | Not applicable. | - Develop and implement a Preliminary Decommissioning and Reclamation Plan.<br>- Design and maintain a mine dewatering system to manage the flow of groundwater inflow.<br>- Monitor groundwater quantity and quality as a part of the Project, including continued monitoring of background wells located upgradient of the Project footprint.<br>- Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project. | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation noted that the residual effects for groundwater indicated a negative change to groundwater elevation but a neutral change for groundwater flows and direction. Métis Nation indicated that groundwater elevation influences flow and direction and questioned the differing conclusions reached as part of the groundwater effects assessment. | NexGen clarified that the assessment of changes to environment resulting from changes to the hydrogeological environment predicted no significant residual adverse effects to any VCs (Canadian Nuclear Safety Commission 2025, 233). | | | | |
| **Human Health (EIS Section 15)** | | | | | |
| Métis Nation questioned why short-term exposures to air quality pollutants were not included in the HHRA. | NexGen has maintained that further quantitative assessments for nitrogen dioxide, particulate matter, and uranium are not required as the screening assessments showed that only minor, short-term, reversible effects to human health could potentially occur. NexGen has committed to implementing a monitoring program to measure ambient air concentrations to maintain human health (Canadian Nuclear Safety Commission 2025, 205). | - Optimize haul routes to reduce fuel consumption and emissions from equipment. Apply water and/or suppressants to site roads, access road, and airstrip, as necessary. Use dust suppressants that minimize environmental risk and are government-approved for use.<br>- Primarily use liquid natural gas for power generation, which generates lower emissions per unit of energy produced than diesel, for on-site power generation. | - Provide funding for full-time independent Indigenous Monitors to enable unrestricted environmental monitoring, subject to the Indigenous Monitor complying with appropriate health and safety and other reasonable site-specific requirements. | - Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project. | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any |
| Métis Nation expressed concerns with the HHRA, including which COPCs were included, the methodology for evaluating | NexGen has maintained that the methodology for completing the HHRA was appropriate, applying a precautionary approach, appropriate guidelines, and | | | | |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
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| toxicity interactions, inconsistencies with the Health Canada policy on incremental cancer risk, and a lack of specifics on residual effects from arsenic.<br><br>Métis Nation noted that the HHRA should form an integral part of any robust and holistic assessment of community wellbeing and requested that the analysis of community wellbeing be updated to that effect. | health-based screening for COPCs. NexGen has noted that the HHRA and effects to human health were considered in the assessment of community wellbeing. Further details on the rationale to determine Project effects can be found in Draft EIS sections 7-19 (Canadian Nuclear Safety Commission 2025, 323). | - Install and operate an effluent treatment plant and a sewage treatment plant to reduce release of constituents of potential concern (e.g., major ions, metals, radionuclides) to the environment and discharge treated effluent and treated sewage to Patterson Lake.<br>- Monitor treated effluent and treated sewage flow and quality.<br>- Collect, store, and routinely monitor contact water to confirm discharge water meets water quality criteria appropriate for release.<br>- Collect and monitor contact water to determine whether treatment is required prior to release to the environment. Implement a Project-specific Environmental Protection Program.<br>- Implement a Project-specific Industrial Air Source Environmental Protection Plan.<br>- Implement a Project-specific Effluent Monitoring Plan that includes monitoring the quality of treated effluent prior to release to the environment.<br>- Implement a Project-specific Environmental Monitoring Plan that includes ambient air monitoring and adaptive management based on ambient air quality standards, and water quality monitoring and adaptive management if necessary. | | | future issues that may arise during the Project lifespan. |
| Métis Nation sought clarification on how NexGen is defining "acceptable" levels of risk to human health and recommended that NexGen clarify the effects of radiological exposure on human health. | NexGen emphasized the promotion of health, safety and well-being of people and the environment to achieve acceptable levels of risk and exposure (Canadian Nuclear Safety Commission 2025, 323). | | | | |
| Métis Nation requested the inclusion of a detailed comparative review of health guidelines from multiple jurisdictions to guarantee the consistent application of those guidelines. | NexGen has stated that no additional consideration of guidelines is required, as the guidelines used were in accordance with current science and regulatory requirements, the most restrictive of federal or provincial guidelines were used, and health-based guidelines from other jurisdictions were used when no federal or provincial guidelines were published (Canadian Nuclear Safety Commission 2025, 323). | | | | |
| **Fish and Fish Habitat (EIS Section 11)** | | | | | |
| Métis Nation indicated that, given Burbot's unique physiology, use of habitat and feeding habits, they should have been selected as a fish species VC to more fully assess baseline information and knowledge gaps for the EIS.<br><br>Métis Nation identified that using one forage fish species may be inadequate to assume how other forage species may retain COPCs. | NexGen has maintained that the selective VCs are representative of burbot physiology, habitat, and feeding habits, however NexGen is open to discussions regarding future monitoring activities. NexGen completed an aquatic health assessment to evaluate the potential magnitude of effects on sensitive aquatic species, which showed that potential health effects on other forage fish species (namely, burbot) would be minimal and within the range of variability observed in unexposed populations (Canadian Nuclear Safety Commission 2025, 296). | Not applicable. | Not applicable. | - Implement a Project-specific Effluent and Emissions Plan.<br>- Confirm discharge (i.e., contact water, treated effluent, treated sewage) meets discharge quality criteria prior to release to the environment.<br>- Monitor effects on fish and fish habitat during the Project lifespan and apply adaptive management, where necessary.<br>- Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project. | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation requested more information regarding effluent release and how mixing zones and temperature changes in water may attract fish and affect refuge-type habitat and use.<br><br>Métis Nation noted concerns that the environmental risk assessment (ERA) identified benthic invertebrates as the most sensitive endpoints for copper exposure in Patterson Lake's north arm. | NexGen has noted that the predicted effects would be within the resilience and adaptability limit of VCs and therefore the Project is not predicted to have significant adverse effects (Canadian Nuclear Safety Commission 2025, 296). | | | | |
| **Wildlife and Wildlife Habitat (EIS Section 14)** | | | | | |
| Métis Nation questioned the choice of Valued Components (VCs) for the Environmental Impact Statement (EIS), emphasizing that omitted species, specifically Burbot, can address baseline knowledge gaps. | NexGen has maintained that the selective VCs are representative of burbot physiology, habitat, and feeding habits, however NexGen is open to discussions regarding future monitoring activities. NexGen completed an aquatic health assessment to evaluate the potential magnitude of effects on sensitive aquatic species, which showed that potential health effects on other forage fish species (namely, burbot) would be minimal and within the range of variability observed in unexposed populations (Canadian Nuclear Safety Commission 2025, 296). | Not applicable. | - Not applicable. | - Implement a Project-specific Environmental Protection Program.<br>- Implement a Project-specific Environmental Monitoring Plan that includes monitoring for hydrology, water quality, benthic invertebrates, fish, and wildlife.<br>- Implement a Caribou Mitigation and Offsetting Plan.<br>- Conduct wildlife patrols regularly during waterbird nesting periods (Zone B6: late April to mid-August; ECCC 2018) to monitor the effectiveness of | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
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| Métis Nation noted a disconnect between field studies and assessments, as the number of traditional plant species listed is less than the number observed during baseline surveys. | NexGen noted that baseline and assessment study areas do not align, however this is common practice due to differences in methodologies for grouping plant species (Canadian Nuclear Safety Commission 2025, 280). | | | deterrents and apply adaptive management, as necessary.<br>- Design above-ground infrastructure so that the need for wildlife crossing structures is minimized (e.g., small to moderate diameter pipeline conveyance systems directly along the ground, often through low points such as small ditches).<br>- If sensitive species are confirmed in the Project footprint, apply activity restriction guidelines for sensitive species established by the Government of Saskatchewan (ENV 2017) to the Project as required.<br>- Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project.<br>- | future issues that may arise during the Project lifespan. |
| Métis Nation questioned the data collection methods and survey results, particularly the number of nighthawks reported and the methods for gauging the size of bat populations. Noting that the study area for birds is different from that of waterfowl and raptors, Métis Nation underscored that this could impact the findings for different wildlife groups. | NexGen clarified that the Automatic Recording Unity (ARU) data represents species occurrences for nighthawks, and high calling rates in a given area indicate the area is consistently used but cannot estimate the number of individuals. NexGen noted that the Alberta protocol for recording bat population could not be followed exactly due to logistics of the area but is confident detection methods met the requirements for baseline data collection (Canadian Nuclear Safety Commission 2025, 311). | | | | |
| Métis Nation expressed concerns about impacts to wildlife and connectivity and asked how NexGen will mitigate those impacts. | NexGen noted that mitigations and monitoring regarding connectivity will be developed in detail during licensing (licence to prepare site and construct) as part of the Environmental Management Plan. NexGen has confirmed that the woodland caribou classification is consistent and based on Government of Saskatchewan habitat mapping and confirmed that wildlife sampling including considerations of habitat use occurred across different habitat sites and seasons to support the development of habitat sustainability models (Canadian Nuclear Safety Commission 2025, 311). | | | | |
| Métis Nation asked whether the classification of caribou habitat is consistent with the Omnia (2018) report and, therefore, the EA and suggested that NexGen determine habitat use and availability based on seasonal or year-round use. | | | | | |
| Métis Nation asked NexGen to explain the correlation drawn between the rusty blackbird habitat and that of the olive-sided flycatcher and its relevance to the EA. | NexGen clarified that Project pathways with the potential to have a greater-than-negligible impacts were carried forward to the residual effect analysis. NexGen maintained sufficient information for species were available for use in the Draft EIS and confirmed that up-to-date provincial guidelines were used and the Final EIS will be updated to include references to the more recent regulations. NexGen noted that ecological context was considered with residual effects criteria to determine significance, and changes in measurement indicators were examined in the context of trends, existing conditions, and resilience to assess cumulative effects. NexGen has maintained that perceived impacts have been considered and valued equally to scientific data collection (Canadian Nuclear Safety Commission 2025, 311). | | | | |
| Métis Nation requested clarification on methods for the residual effects analysis and asked why the lack of available information for certain species was not addressed within baseline studies, and why more up-to-date provincial wildlife regulations were not used. | | | | | |
| Métis Nation noted that there are no measurement indicators for resilience and adaptability, despite the analysis for determining residual effects being based on species' resilience and adaptability limits. | | | | | |
| Métis Nation emphasized that the assessment should consider both real and perceived impacts, to reflect that knowledge of the land and resource use is just as valuable as scientific data collection. | | | | | |
| **Cultural and Heritage Resources and Indigenous Land and Resource Use (EIS Section 16)** | | | | | |
| Métis Nation citizens are concerned about accessing existing traplines in proximity to the potential mine site. Métis Nation citizens expressed the need for locals to control the land, not industry, as industry leasing the land restricts access to their traplines and cabins. Métis Nation requested that NexGen work with Métis Nation to develop fishing | NexGen has committed to accommodation measures including limiting the project footprint to the extent practical and controlling public access to the site (Canadian Nuclear Safety Commission 2025, 341). | - Limit the Project footprint to the extent practical using practices such as:<br>o optimizing use of cleared areas for Project activity;<br>o using existing road infrastructure, including existing access road and bridge crossing;<br>o storing tailings underground; and | Not applicable. | - Implement a Project-specific Environmental Protection Program.<br>- Implement an Indigenous and Public Engagement Program to share information on Project plans and activities. Summaries of relevant Project information will be translated and provided in audio format for sharing with Indigenous Groups, as relevant, and | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
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| policies that consider both fisheries protection and traditional use activities. | | ○ designing an efficient infrastructure footprint (i.e., buildings clustered together).<br>- Install a gate at the site entrance (i.e., gatehouse) to control public access.<br>- Implement progressive reclamation and revegetation of disturbed areas no longer required.<br>- Reclaim and revegetate areas where non-permanent Project facilities have been decommissioned.<br>- Implement a Security Program to provide safe and coordinated access via the access road to locations where other land and resource use is practiced.<br>- Develop and implement a Preliminary Decommissioning and Reclamation Plan with government and Indigenous communities to decommission and transfer the site to the Province under the Institutional Control Program.<br>- Implement Benefit Agreements, including:<br>○ funding and human resources to support community-related initiatives including but not limited to cultural and traditional values; and<br>○ the establishment of the Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project.<br>- Provide funding for full-time independent Indigenous Monitors to enable unrestricted environmental monitoring, subject to the Indigenous Monitor complying with appropriate health and safety and other reasonable site-specific requirements. | | use of these additional communication methods will be based on discussions with Indigenous Groups. | NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation noted a disconnect in the EIS where the number of species identified as traditional plant species is less than the number of traditional use plant species observed during baseline surveys. | NexGen noted that baseline and assessment study areas do not align, however this is common practice due to differences in methodologies for grouping plant species (Canadian Nuclear Safety Commission 2025, 281). | | | | |
| Métis Nation shared concerns that moose have moved further away because there is too much activity in the area, and one member noted that not only are there are fewer fish in the lakes, but coyotes are also venturing into the community now because there is less food for them to hunt. | NexGen has committed to developing details for an EMP during licensing (licence to prepare site and construct) with mechanisms for wildlife surveillance and independent Indigenous monitoring to observe and address changes in movement routes (Canadian Nuclear Safety Commission 2025, 344). | | | | |
| Métis Nation requested additional information related to the ongoing management and maintenance of Highway 955 given this is an important travel route to access traditional use areas. | NexGen noted that development of the Project Ground Transportation Emergency Response Plan would occur during licensing (licence to prepare site and construct) and involve engagement with the Métis Nation. NexGen has also acknowledged that maintenance of Highway 955 is outside of NexGen's control but has continued discussions with the Saskatchewan Ministry of Highways and has developed a road upgrade and maintenance agreement (Canadian Nuclear Safety Commission 2025, 346). | | | | |
| Métis Nation citizens do not believe the Cluff Lake Mine was properly decommissioned and therefore do not trust the government's requirements as they pertain to the proposed NexGen Rook I project. They question the manner in which the Cluff Lake Mine tailings pond was decommissioned; they do not trust the method used and want to know if there is radioactive contamination on the surface of waste rock. Informed by their experience with the Cluff Lake Mine, Métis Nation citizens have many concerns, the biggest of which is their distrust of the industry, an industry which refuses to explicitly state the dangers involved with uranium extraction. In general, citizens believe that the deaths of those who worked at the Cluff Lake Mine were a result of exposure, and that the high cancer rates throughout the community are also a result of exposure to uranium in dust, water, animals and plants. | NexGen noted that a detailed Project Decommissioning and Reclamation Plan would occur during licensing (licence to prepare site and construct) and involve engagement with the Métis Nation through the Environmental Committee. Independent Indigenous monitoring and discussions with the Métis Nation throughout the Project's life through the Environmental Committee will result in an accurate understanding of the Project's effects and can inform progressive reclamation and adaptive management. NexGen assessed multiple pathways that may adversely affect human health through food ingestion including emission and deposition of fugitive dust, radon, criteria air contaminants, and suspended solids as well as discharge of treated effluent and site runoff and committed to implementing a series of mitigation measures to minimize impacts on human health and the surrounding environment (NexGen Energy Ltd. 2024b, 347). | | | | |
| Métis Nation citizens have noticed a change in the quality of meat and pelts. Citizens noted increased contamination in the food, especially from areas further north; others expressed concerns about eating fish, rabbits, and moose from the north due to legacy issues associated with Cluff Lake. | | | | | |
| Métis Nation citizens shared concerns that cumulative impacts of substantial and growing projects and mineral exploration activity will severely limit their ability to | NexGen confirmed that exploration activities in the area of the project, including those conducted by NexGen, were assessed within the EA in addition to previous, existing and approved projects, and RFDs. NexGen has committed to | | | | |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
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| continue to use the region around and north of Patterson Lake. | establishing an Environmental Committee to monitor environmental performance of the Project, continued engagement with the Métis Nation, and further mitigation measures to minimize adverse effects on access to Indigenous land and resources (Canadian Nuclear Safety Commission 2025, 386). | | | | |
| **Accidents and Malfunctions (EIS Section 21)** | | | | | |
| Métis Nation requested NexGen complete a hazard scenario related to vehicles be included in the EIS. Métis Nation noted concerns of materials being hauled from Highway 955 and Highway 155 at Green Lake to the Project site and that there were no mitigations provided for reducing the potential for accidents on this stretch of road. | NexGen confirmed that the spatial extent of transportation risk was appropriately assessed, as accident rates on larger highway systems are lower than on smaller roads and very few incidents have been reported despite hazardous chemicals being transported through freeways on a national scale, and effects in the area are similar to those assessed for Highway 955 and Highway 155 while being more accessible to response transportation (Canadian Nuclear Safety Commission 2025, 358). | - Upgrades to the existing access road from Highway 955 are planned to improve the safety of the road and limit the potential for accidents occurring during the Project lifespan.<br>- The current bridge design and capacity (5.7 m deck width, weight limit of 50 t) is suitable for use by most heavy equipment and traffic, including trucks transporting the uranium concentrate. The bridge is fitted with metal guards approximately 0.15 m high to guard the driver across the deck.<br>- Use of the existing access road alignment would limit the potential for interaction between spills and the surface water environment. The existing road alignment minimizes the number of water features crossed and is set back from waterbodies and watercourses.<br>- Speed limits would be in place for the access road and Clearwater River Bridge crossing to reduce the potential for speed to contribute to or worsen the outcome of a potential accident scenario.<br>- Potentially unsafe road conditions that could contribute to a traffic accident scenario (e.g., icy road conditions) would be addressed as quickly as possible (e.g., through snow removal, sanding), and if necessary, a no-travel order would be issued.<br>- Relevant staff or contractors would receive training on how to drive safely on site and on the access road, on defensive driving techniques, and on how to respond to emergency situations, such as an accident or spill.<br>- Any spill, release, or emergency that may harm the environment or pose a risk to public health or safety would be reported immediately and managed and remediated in accordance with Saskatchewan's Environmental Management and Protection Act, 2010 and The Saskatchewan Environmental Code (Government of Saskatchewan 2014b).<br>- The clean-up, treatment, and disposal of contaminated material, including affected soils and sediment associated with a potential spill, would be handled by a certified specialized subcontractor. The spill would be cleaned up immediately and access to the affected area would be restricted, and fenced off if feasible, to limit access to the area by people and wildlife.<br>- An Environmental Protection Program and an Emergency Preparedness and Response Program would be implemented for the Project. | Not applicable. | - Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project.<br>- Develop a Fire Protection Program that, in accordance with Section 35 of The Wildfire Act, includes frequently checking mobile equipment or machinery throughout its daily use for any accumulation of combustible material, with any accumulation found being removed and disposed of safely.<br>- Controls would be implemented, and their effectiveness monitored to prevent accidents and malfunctions via management system processes defined in topic-specific programs which include, but may not be limited to the following:<br>o Integrated Management System<br>o Integrated Management System Manual<br>o Health and Safety Program<br>o Radiation Protection Program<br>o Environmental Protection Program<br>o Waste Management Program<br>o Emergency Preparedness and Response Program<br>o Fire Protection Program<br>o Security Program<br>o Training Program<br>o Contractor Management Program<br>o Indigenous and Public Engagement Program<br>o Construction Management Program<br>o Commissioning Management Program<br>o Asset Management Program. | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation indicated that in the event of a traffic accident resulting in a release of uranium concentrates, fuel, or hazardous chemicals, there is a risk to the environment, as well as a risk of initiating a fire or explosion, beyond the aquatic environment, which poses additional risks to the environment and human health. | NexGen confirmed that these potential hazards including the consideration of fires have been considered and either possess low risk or would be managed to present as low as reasonably practicable risks (NexGen Energy Ltd. 2024b, 359). | | | | |
| Métis Nation noted concerns that the proposed mitigations contained in the Ground Transportation Emergency Response Plan did not specifically mention Indigenous land and resource users in order to maintain the safety of Indigenous land and resource users utilizing Project area roads. | NexGen noted that Indigenous land and resource users and Indigenous trappers are mentioned in the plan, and detailed development of the plan will occur during licensing (licence to prepare site and construct) and involve engagement with primary Indigenous Nations and communities (NexGen Energy Ltd. 2024b, 359). | | | | |
| **Assessment of Effects of the Environment on the Project (EIS Section 22)** | | | | | |
| Métis Nation noted that the climate change analysis contained in the EIS was qualitative and high-level and that some of the | NexGen noted that a quantitative climate change assessment was conducted with estimated prediction incorporated into the hydrology assessment. NexGen | Not applicable. | - Not applicable. | - Implement a Project-specific Environmental Protection Program and a Project-specific | Status: **Resolved** – Issues and interests have been addressed by the identified |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
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| assumptions made regarding climate change effects may be too simplistic.<br><br>Métis Nation also noted that monitoring programs do not consider climate change.<br><br>Métis Nation raised questions of whether the warmer effluent being released, interacting with the potential for climate change to also raise water temperatures, to affect lake trout habitat sooner than predicted.<br><br>Métis Nation indicated it was not clear if the risk measurement and evaluation for tornado damage considered climate change. | committed to conducting detailed scoping and development of EMP details during licensing (licence to prepare site and construct) including Indigenous engagement. NexGen committed to capturing and storing treated effluent at ambient temperatures prior to release to Patterson Lake such that it is not expected to result in changes to water temperatures or volumes that would affect trout. Finally, NexGen confirmed that the effects of climate change were considered in the assessment of all weather or climate-related hazard (NexGen Energy Ltd. 2024b, 371). | | | Environmental Monitoring Plan that includes adaptive management, if necessary.<br>- Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project.<br>- Provide funding for full-time independent Indigenous Monitors to enable unrestricted environmental monitoring, subject to the Indigenous Monitor complying with appropriate health and safety and other reasonable site-specific requirements.<br>- Implement a Project-specific Effluent and Emissions Plan.<br>- Monitor effects on fish and fish habitat during the Project lifespan and apply adaptive management, where necessary. | mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| **Monitoring, Follow-up, and Adaptive Management (EIS Section 23)** | | | | | |
| Métis Nation asked how NexGen will monitor aquatic environments until decommissioning and asked NexGen to detail its environmental monitoring plan for aquatic species. | NexGen confirmed that end-of-pipe concentrations of COPCs are predicted to be higher than the chronic Project threshold, but below acute toxicity levels for fish and has committed to developing a comprehensive monitoring plan including surface water quality. As acutely toxic COPCs would not be released to the environment, NexGen has maintained that their assessment, including the use of dilution, is appropriate. NexGen noted that to address increased road use and mitigate the release of COPCs from an accident, upgrades to existing access roads are planned. Finally, NexGen has clarified that the invasive species management plan will be developed during licensing (licence to prepare site and construct). | Not applicable. | Not applicable. | - Implement a Project-specific Environmental Protection Program and a Project-specific Environmental Monitoring Plan that includes adaptive management, if necessary.<br>- Monitor effects on fish and fish habitat during the Project lifespan and apply adaptive management, where necessary.<br>- Implement Benefit Agreements, including the establishment of an Implementation Committee to communicate regularly and to reach early resolution of issues and/or disputes that may arise.<br>- Establish an Environmental Committee to monitor environmental performance of the Project.<br>- Provide funding for full-time independent Indigenous Monitors to enable unrestricted environmental monitoring, subject to the Indigenous Monitor complying with appropriate health and safety and other reasonable site-specific requirements. | Status: **Resolved** – Issues and interests have been addressed by the identified mitigations and commitments in the FEIS. Monitoring program development will refine the mitigations and commitments, as necessary. NexGen has provided a framework to address any future issues that may arise during the Project lifespan. |
| Métis Nation noted that monitoring programs do not consider climate change. | NexGen noted that a quantitative climate change assessment was conducted with estimated prediction incorporated into the hydrology assessment. NexGen committed to conducting detailed scoping and development of EMP details during licensing (licence to prepare site and construct) including Indigenous engagement. NexGen committed to capturing and storing treated effluent at ambient temperatures prior to release to Patterson Lake such that it is not expected to result in changes to water temperatures or volumes that would affect trout. Finally, NexGen confirmed that the effects of climate change were considered in the assessment of all weather or climate-related hazards (NexGen Energy Ltd. 2024b, 371). | | | | |
| Métis Nation noted a concern that the Environmental Monitoring Plan for vegetation was not identified. | NexGen confirmed that the development of environmental monitoring details for the Project would occur outside of the environmental assessment process, and involve engagement with primary Indigenous Nations and communities, including the Métis Nation. NexGen has stated that while all reasonable efforts will be made to reestablish vegetation communities representative of existing conditions, the terrain would have changed as a result of the Project and the effectiveness of such a reclamation is uncertain. NexGen has confirmed that surveys for non-vascular plants were not conducted as no plant species at risk or critical habitat, including lichen, | | | | |

| CNSC Summary of Métis Issues and Interests | NexGen Response to Issue and/or Interest | Mitigations Identified by NexGen to Address Métis Issues and Interests in the draft EIS (Table 2B-2) | Additional Mitigations Identified by NexGen to Address Métis Issues and Interests in the final EIS (Table 2B-2) | Other Relevant Project Commitments Made by NexGen in the Federal Commitments Report to Address Métis Issues and Interests | Issue and Interest Resolution Status (as of January 2026) |
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| | were listed in the regional study area (NexGen Energy Ltd. 2024b, 281). | | | | |

# References

Canadian Nuclear Safety Commission. 2025. "25-H12 - CNSC Staff Submission: NexGen Energy Ltd. Application for a Licence to Prepare Site and Construct the Rook I Uranium Mine and Mill." October 10.

NexGen Energy Ltd. 2024a. "Rook I Project: Environmental Impact Statement." November.

NexGen Energy Ltd. 2024b. "Rook I Project: Federal Commitments Report." April.

# MNS-Rook 1 Final Letter for CNSC-NexGen

Final Audit Report 2026-01-09

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