



CMD 25-H12.35

Date: 2025-01-09

**Written Submission from
Integral Ecology Group**

**Mémoire du
Integral Ecology Group**

In the matter of

À l'égard de

NexGen Energy Ltd.

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

NexGen Energy Ltd.

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

Février 2026



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January 9, 2026

File: Admin

Canadian Nuclear Safety Commission

REFERENCE: NEXGEN ENERGY LTD.'S ROOK I PROJECT

To whom it may concern:

I am writing pursuant to rule 19 of the Canadian Nuclear Safety Commission Rules of Procedure, as a person who has an interest or expertise in this matter or information that may be useful to the Commission in coming to a decision on NexGen Energy Ltd.'s (NexGen's) application.

I have been involved in the Rook I project since October 2020, as a consultant providing advice and services to NexGen on matters related to reclamation and environmental standards. As such, I should first be transparent that I occupy an interested position, in that I and my company have benefited directly from NexGen's Project, and there is a reasonable probability of further benefit should the Project receive the necessary licensing and approvals to move forward. As a small consultancy, we generally do not take advocacy positions—we try to do our best work for our clients, but strive to maintain neutrality around key issues such as project approvals. That is, we try to supply the best information we can to the people who matter in decision making, but generally do not try to influence their decisions.

I also want to say that as an individual and as a company, I/we have little immediately at stake in this decision. NexGen is an important client for us, and we have also formed important relationships—facilitated by NexGen—with members and residents of the Clearwater River Dene Nation (CRDN). However, of approximately 40 employees in our company, only one lives within 500 km of the Project, and so there is a way in which the vast majority of my colleagues and I are not directly affected by the decision around the Rook I Project, and want to be very respectful of the positions of people who are more directly affected. We believe that development approvals should be decided by those with most at stake: the Treaty signatories and rightsholders, the regulators, NexGen, and anyone else directly and substantively affected by the Project.

That being said, I am aware of a range of opinions around the Rook I Project, and many of these opinions are positive. My understanding from conversations

with some CRDN members non-member community residents is that they view the economic development and employment associated with the project as important potential contributors to the wellbeing of the community. My colleagues and I have seen the positive aspects of NexGen's camp culture for Dënë workers—including after-work cultural activities, joy in seeing friends and acquaintances, and active and frequent use of the Dënësułinë language—and contrast that to less positive atmospheres we've experienced at other industrial sites. In our experience, NexGen has supported a number of environmental programs—both in the CRDN community and at the Rook I site—that have involved members of CRDN, Birch Narrows Dene Nation, Buffalo River Dene Nation, and the Métis Nation of Saskatchewan (MNS), and we have heard students and teachers from the Clearwater River Dene School (CRDS) speak about the importance of this work. NexGen has for multiple years supported a tree-planting program with CRDS, both in CRDN and at the Rook I site. On one memorable occasion, we planted over the course of two days at the Rook I site, and camped in tents in the grassy area in the centre of the Project camp. That evening was a bit of a community party, with students talking with friends and relatives working in camp, and swimming in the lake, and checking out the games rooms in camp. Further, NexGen has committed to upholding standards of environmental excellence, and has since 2023 supported a seed collection and tree planting program. In the spring of 2025, CRDS students and an MNS member planted trees and other plants that were grown from seeds previously collected by CRDS students on site. To our knowledge, this is the first program of its kind in Saskatchewan, in which seedlings were grown from seed collected by local Indigenous people and then also planted by local Indigenous people. NexGen has also committed to a formal process for working with local communities to collaboratively develop a vision and plan for the transition to a post-mining landscape. This plan is voluntary, and again, to our knowledge, the first of its kind in Saskatchewan.

I am also aware of members and residents of CRDN who are concerned about the recent increase in exploration and development activities in northwest Saskatchewan—both specific to Rook I and the area that it will affect around Patterson Lake, and more generally with respect to what the cumulative effects of a uranium development "boom" in this area might be. I believe that these concerns have validity, and will need to be carefully considered and managed. At the same time, NexGen, as an early entrant to this area in this current round of development, has tried with success to set high environmental standards and



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include local Indigenous people in their work, and has made meaningful positive contributions to local communities.

Thank you very much for your consideration of this matter, and for providing the opportunity to comment.

Yours sincerely,

A handwritten signature in blue ink, appearing to be "J. Straker", written over a light blue circular background.

Justin Straker, MSc, PAg (SK)

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