



CMD 25-H12.49

Date: 2026-01-20

**Written Submission from the
Willow Lake Métis Nation
(Redacted)**

**Mémoire de la
Nation métisse de Willow Lake
(Caviardé)**

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

REQUEST TO INTERVENE AND WRITTEN SUBMISSION

NexGen Energy Ltd.

Rook I Uranium Mine and Mill Project

Canadian Nuclear Safety Commission (CNSC) Public Hearing

Reference: 2025-H-12

Filed by: Willow Lake Métis Nation (WLMN)

Filing date: January 20, 2026 (pursuant to extension granted by the Commission Registry)

Note: WLMN contact information is provided on a separate page to support confidentiality, consistent with the
CNSC Revised Notice.

1. Request to intervene (Rule 19)

Willow Lake Métis Nation (WLMN) respectfully submits this Request to Intervene and Written Submission to the Canadian Nuclear Safety Commission (the Commission) in relation to NexGen Energy Ltd.'s licence application for the Rook I Uranium Mine and Mill Project (Ref. 2025-H-12). This submission is filed pursuant to an extension granted by the Commission Registry to January 20, 2026.

The Project is proposed on the Patterson Lake peninsula in northern Saskatchewan, within the southwest Athabasca Basin, and is the subject of a 2-part public hearing (Part 1 held November 19, 2025; Part 2 scheduled for February 9-13, 2026).

WLMN is an Indigenous rights-bearing Métis community within the meaning of section 35 of the Constitution Act, 1982. WLMN's Traditional Territory includes lands and waters in and around the Athabasca Basin in what is now northeast Alberta and northwest Saskatchewan and in the Clearwater River and Athabasca River watersheds. WLMN members have used and relied on these lands and waters for generations for harvesting, travel, and cultural practices. WLMN maintains governance through a democratically elected leadership representing its citizens.

WLMN has a direct interest in the Commission's decision because the Project is located within the Athabasca Basin region and may adversely affect the continued meaningful exercise of WLMN section 35 rights, including hunting, fishing, trapping, gathering, and associated cultural practices.

WLMN has information that may assist the Commission in coming to a decision about the Project, including Indigenous knowledge of land and water conditions, traditional use, harvesting areas, and community concerns regarding project-specific and cumulative effects and long-term confidence in environmental protection in a uranium mining and milling context.

WLMN requests to participate by (select one):

☐ Written submission only

☒ Written submission and oral presentation during Part 2 of the hearing (Feb. 9-13, 2026)

2. Executive summary

- WLMN asserts section 35 rights and ongoing land and water use in its Traditional Territory in the Athabasca Basin and Clearwater River watershed region, including northwest Saskatchewan and northeast Alberta.
- WLMN is not represented by the Métis Nation-Saskatchewan (MNS) or the Métis Nation of Alberta Association (MNAA). WLMN is governed by its own elected leadership and advances its rights independently.
- WLMN's central concern is that the Crown and/or the proponent engagement approach has excluded WLMN from meaningful consultation and accommodation on a project of the scale, footprint, and longevity of Rook I, in a region already burdened by cumulative industrial pressures.

- Without WLMN-informed assessment and enforceable mitigation, monitoring, and follow-up, the Project may further diminish WLMN's ability to exercise harvesting and cultural practices by affecting access, wildlife and fish abundance, water quality or water levels, and confidence in the safety of land and water use.
- WLMN requests that the Commission not authorize the Project unless it is satisfied that potential Project impacts to WLMN's rights and interests have been meaningfully assessed and addressed, and that enforceable license conditions and follow-up measures are in place to avoid, minimize, and offset adverse effects, including cumulative effects.

3. WLMN interest and connection to the Project area

WLMN is a local settlement of the Historic Métis Nation. WLMN's Traditional Territory includes the Athabasca Basin and lands, waters, and travel corridors in and around northwest Saskatchewan and northeast Alberta. WLMN members have relied on these lands and waters to hunt, fish, trap, gather plants (including berries and medicines), and to carry out cultural and community practices tied to seasonal harvesting cycles. Historical records, including fur trade post journals, demonstrate the presence of WLMN ancestors in locations in northeast Alberta and northwest Saskatchewan, including in the area of the Clearwater River, Portage La Loche, and Fort McMurray, from the 1870s. WLMN continues to use the Clearwater River and Athabasca River watershed areas for harvesting and other traditional land uses.

The WLMN are descendants of the Historic Métis Nation who resided and continue to reside in that part of the Métis Nation Homeland in what is now known as northwest Saskatchewan and northeast Alberta referred to as the "WLMN Traditional Territory".

Prior to 1900, some members of the Metis Nation lived within the WLMN Traditional Territory and comprised a distinct Aboriginal cultural and political community, who collectively possessed, occupied, used and had the benefit of lands and resources in accordance with their own laws and customs. This situation developed as follows:

During the evolution of the Historic Metis Nation, the ancestors of the WLMN continued to hunt, trap, gather and fish for both commercial and subsistence purposes in and around the fur trading posts at Ile a la Crosse and its network of secondary posts at Portage la Loche, Fort McMurray, and Fort Chipewyan.

As part of the economy and business life of the area, the WLMN ancestors dealt in a fur economy of credit and debt using a "Made Beaver" monetary system which was not replaced by a cash monetary system until as late as 1908; and with the expansion of trading posts, Metis settled in various communities in the area now known as northwest Saskatchewan and northeast Alberta; historically and presently those Metis made and continue to make their livelihood from the lands and resources in the WLMN Traditional Territory.

Many of the historic villages/settlements in the WLMN Traditional Territory continue to exist to this day as Métis villages in their former locations, such as Ile a la Crosse, La Loche, Lac la Biche and Fort Chipewyan, while others within the WLMN Traditional Territory have been established in the intervening years by residents of these original historic Métis villages.

Marquerite Boucher a Métis from Fort Chipewyan married Jean-Baptiste Riel, a French voyageur from Quebec, and their son, Louis Riel Sr, was born on July 7, 1817, at Ile a la Crosse and died at the Red River Settlement on January 21, 1864.

In 1870, the Métis Nation under the leadership of President Louis Riel, the son of Louis Riel Sr. negotiated the entry of the province of Manitoba into Confederation through the Manitoba Act, 1870. Many similar family kinships and intermarriages maintained a strong connection between Northwest Saskatchewan/ Northeast Alberta and the Red River Settlement. WLMN is ancestrally connected to the regional rights bearing Metis community now known as the Northwest Saskatchewan Metis Community.

WLMN's ancestors have long used and occupied lands and waters in what is now Alberta and Saskatchewan. WLMN's Traditional Territory includes the Athabasca basin area in Canada and includes the lands, forests, hills, muskeg, and rivers in and around northwest Saskatchewan and Northeast Alberta.

Prior to the effective control by the Crown over its Traditional Territory, WLMN's ancestors had a well-established way of life, culture, and economy as part of the Historic Metis Nation. In carrying out this way of life, WLMN supported themselves in a variety of ways, including through hunting, fishing, trapping, and gathering plants, such as berries and medicinal plants. WLMN also participated in commercial trade with other Indigenous groups and Europeans, exchanging furs, provisions, and other material goods.

The availability of large game was and remains central to WLMN's hunting-based culture and way of life. Although WLMN's ancestors had long depended on wood bison for subsistence and cultural purposes, the wood bison population in WLMN's Traditional Territory began declining in 1820 and was all but eradicated by the early 1830s. Following the demise of the wood bison in or around 1830, WLMN's ancestors were forced to rely more heavily on other species, such as moose, caribou, elk, and, to a lesser extent, bear and deer.

By 1900, moose was the primary species taken by WLMN. It played and continues to play an integral role with respect to WLMN's culture, identity, and way of life. WLMN's way of life depended on the availability of and access to preferred lands, waters, and natural resources of sufficient quality and quantity to maintain WLMN's traditional seasonal harvesting and subsistence cycles, including seasonal movements between traditional hunting areas.

Moreover, in order to engage in effective hunting, fishing, trapping, gathering, and other land-based practices, WLMN required deep familiarity with specific lands, waters, and ecosystems. Many of these practices, such as moose hunting and the hunting of other large game required years of study and observation of specific lands, ecosystems, and wildlife populations. WLMN's way of life also depended on the ability to pass knowledge to successive generations, including knowledge about:

- the traditional seasonal harvesting and subsistence cycle;
- traditional hunting, fishing, trapping, and gathering practices; and
- spiritual, ceremonial, and other cultural beliefs and practices.

This knowledge was passed to successive generations orally, through cultural and spiritual practices, as well as through participation in traditional hunting, fishing, trapping, and gathering practices – all of which depended on the continued availability of and access to preferred lands, waters, and natural resources.

WLMN has never been affiliated with the MNS. WLMN members are not members of the MNS. Some of the members of WLMN were members of the MNAA Region One and they were represented by the Metis Nation of Alberta Association Metis Local Council #780 Anzac until approximately February 2020.

On or about August 3, 2021, WLMN members terminated their membership in the MNAA, and they authorized the WLMN, as represented by the Willow Lake Metis Community Association, to represent their section 35 aboriginal rights, pursuant to their right to self-determination.

WLMN notes that provincial boundaries established in 1905 divided WLMN's Traditional Territory, but do not extinguish Métis rights. WLMN continues to assert that its rights are ongoing on both sides of the provincial boundary and must be meaningfully addressed where Crown decisions and project effects may adversely affect those rights.

WLMN's concerns are heightened by the long-term nature of uranium mining and milling, the need for high confidence in environmental protection, cumulative impacts (including climate change), and the importance of sustained access to safe land and water for present and future generations.

4. Issues for the Commission

4.1 Adequacy of consultation and accommodation with WLMN

WLMN's primary issue is that the commission has not sufficiently engaged WLMN as a potentially affected Indigenous rights-holder, that potential effects on WLMN have not been assessed, and that accommodation measures were not considered where adverse effects on WLMN rights may occur. WLMN understands that federal engagement for the Project has prioritized First Nations and Métis governments and communities in Saskatchewan. WLMN submits that this approach is not adequate and has resulted in WLMN being excluded from consultation on decisions affecting its Traditional Territory.

WLMN respectfully requests that the Commission:

- Require CNSC staff to place on the record a clear summary of Crown consultation undertaken with WLMN specific to the Project and find it deficient.
- Defer the licensing decision until adequate consultation and accommodation with WLMN occurs or impose binding conditions that require meaningful engagement with WLMN before key authorizations proceed.

4.2 Cumulative effects on land and harvesting rights

WLMN submits that cumulative effects are central to understanding real-world impacts on Indigenous rights. Industrial disturbance, habitat fragmentation, access change, and long-term contamination risk can together undermine the continued meaningful exercise of harvesting and cultural practices.

WLMN respectfully requests that the Commission:

- Ensure the EA explicitly addresses cumulative effects on Indigenous harvesting and land use, including WLMN use areas and travel corridors.
- Require follow-up and monitoring programs that track cumulative effects indicators relevant to Métis harvesting, with WLMN participation in design implementation, and interpretation.

4.3 Water protection and confidence in safe use

For WLMN, the ability to use water bodies safely (for drinking, fish consumption, and other cultural uses) is inseparable from harvesting rights. WLMN is concerned about long-term risks from mining and milling, including potential releases, tailings management, and the durability of controls over the life of the facility and beyond.

WLMN respectfully requests that the Commission:

- Require robust baseline and follow-up water monitoring that is publicly reported and includes culturally relevant indicators (fish tissue where appropriate, traditional use sampling priorities identified with WLMN, thresholds relevant to rights-based land use, and clear communication of results in plain language).
- Require clear, enforceable triggers and response actions for any exceedances or adverse trends, including notification protocols that include WLMN.

4.4 Access management, disturbance, and reclamation

WLMN is concerned about direct and indirect access effects, including changes to travel patterns, increased third-party access, and disturbance (noise, light, dust) that can displace wildlife and reduce the quality of harvesting. WLMN is also concerned about whether reclamation commitments will be sufficient and enforceable over time.

WLMN respectfully requests that the Commission:

- Require an access management approach that addresses third-party access pressures and protects key harvesting values to the extent possible.
- Require reclamation objectives, performance criteria, and long-term monitoring commitments that consider and protect WLMN section 35 rights, and are clearly enforceable and transparent, including progressive reclamation where feasible.

4.5 Indigenous knowledge, oversight, and adaptive management

WLMN submits that Indigenous knowledge must be integrated respectfully and meaningfully, with clear rules for confidentiality, ownership, and use. WLMN also submits that effective oversight requires transparent reporting and adaptive management that can respond quickly to emerging risks.

WLMN respectfully requests that Commission:

- Require a WLMN-specific Indigenous knowledge and land use engagement protocol (including confidentiality and consent) to inform monitoring and mitigation programs.
- Require periodic reporting to the Commission on Indigenous engagement, monitoring outcomes, and adaptive management actions, including WLMN participation in review meetings and follow-up.

5. Requested outcomes

WLMN respectfully requests that the Commission:

- Decline to issue the requested licence at this time, or defer its decision, as the record does not demonstrate adequate consultation and accommodation of WLMN in relation to adverse effects on WLMN section 35 rights; and
- In the alternative, if the Commission proceeds to authorize the Project, impose enforceable license conditions that:
 - Require meaningful engagement with WLMN,
 - Address cumulative effects and culturally relevant monitoring,
 - Ensure transparent reporting, triggers, and response actions for environmental protection, and
 - Provide for ongoing oversight and adaptive management with WLMN involvement.

WLMN reserves the right to provide supplementary submissions if additional information becomes available, and to respond to information presented during the hearing.

6. Closing

Respectfully submitted on behalf of Willow Lake Métis Nation.

Signature: Matthew Michetti

Name and title: Matthew Michetti, Senior Manager Government and Industry Relations

Date: January 20, 2026

Appendix A:

- Map of WLMN Traditional Territory

Note: Appendix A has been redacted subject to a Request for Confidentiality under Rule 12