

# Wheeler River Project

## Indigenous Engagement Report

August 2025



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Denison's flagship Wheeler River Uranium Project is located in northern Saskatchewan within the boundaries of Treaty 10, in the traditional territory of English River First Nation, within the Nuhenéné (the Athabasca Denesų́liné territory), and in the homeland of the Métis.



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# 1 Indigenous Engagement

Indigenous peoples have a unique and important relationship with the environment, and importantly hold Treaty and/or Aboriginal Rights, which must be fully respected during the process of project assessment, permitting, development, construction, operation and decommissioning.

Denison understands the importance of engaging with Indigenous peoples and since 2016, has been engaging with various Indigenous communities and people to support the development of positive relationships and a mutual commitment to collaboration.

Denison's general engagement activities are designed to meet varying expectations while complying with both federal and provincial regulatory legislation. Engagement is defined as the sharing and gathering of project-related information from Interested Parties (sometimes referred to as Stakeholders), and the collaboration with Interested Parties in a good faith effort with the goal of developing mutually acceptable resolutions. Indigenous peoples are an important Interested Party for the Project. The development of relationships with Interested Parties is a fundamental determinant of the Project's success. Denison has outlined the following key principles to develop positive relationships through engaging with Interested Parties:

1. Conduct engagement in a variety of ways, venues, and make every effort to identify and include all Interested Parties using an iterative manner.
2. Undertake the development of a relationship between Denison and the Interested Party.
3. Provide meaningful and relevant information about the Project in a culturally appropriate format and language that is easily understandable by each specific group – which respects local traditions, timeframes, and the decision-making processes of each entity.
4. Based on information shared between Denison and the Interested Party, seek information about their interests; listen to the information shared; and aim to understand their perspectives and priorities.
5. Consider how their interests interact with Denison's and the Project.
6. Integrate their perspectives and interests in decision-making about the Project, where appropriate, including the process for assessing the Project.
7. Where concerns are raised about the process, the Project, or its potential impacts, collaborate with them in developing potential solutions to those concerns.
8. Where necessary, adjust the initial plans for the Project to reduce potential impacts and accommodate Rights and interests.
9. Make active and good-faith efforts to resolve all material issues in the above-identified fashion.
10. Commence development of the Project (if appropriate and permitted) in a manner that respects interests.

Denison has further identified key objectives respecting Indigenous engagement associated with the Project:

- Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency;
- Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion; and
- Understand how the proposed development of the Project may impact Indigenous peoples' interests (including Indigenous and/or Treaty rights), and work with Indigenous people to avoid, mitigate or otherwise address adverse impacts, while also collaborating to maximize potential positive impacts.

Denison's Indigenous engagement activities have focussed on Indigenous Communities of Interest, Other Indigenous Communities and Indigenous Organizations, further described in Section 4 of the EIS.

The submission of the proposed Project to the Federal and Provincial regulatory agencies to obtain environmental impact assessment approvals has triggered the Crown's Duty to Consult (both Federal and Provincial) with potentially affected Indigenous communities. Denison is committed to supporting the Crown in carrying out its Duty to Consult obligations. Specifically, as directed by the Province of Saskatchewan, Denison has been assigned various procedural aspects of Saskatchewan Ministry of Environment's consultation process in the development of the EIS. For this Project, the CNSC has not delegated any procedural aspects of the Duty to Consult to Denison (Denison 2022). Denison remains committed to providing CNSC, along with the Province of Saskatchewan, information that may inform the CNSC analysis of its Duty to Consult in connection with the EA process.

This Indigenous Engagement Report (IER) will outline the list of Indigenous communities identified for engagement activities, including the rationale for inclusion / exclusion; a summary of the activities conducted to date; and an outline of planned activities and associated milestones. This IER is intended to be a living document, which will be adapted, modified and reported on at various points during the associated regulatory process for the Project, including when any material changes occur to the Project or the Indigenous engagement program.

## 1.1 Regulatory Context

The Project is subject to both federal and provincial Environmental Assessment (EA) processes under the *Canadian Environmental Assessment Act, 2012* (CEAA; Government of Canada 2019) and Saskatchewan's *The Environmental Assessment Act* (Government of Saskatchewan 2018). Requirements for engagement under each regulatory process include the following guidance documentation:

- Canadian Nuclear Safety Commission (CNSC) requirements (under CEAA 2012 assessment):
  - REGDOC-3.2.1 (May 2018): Public and Indigenous Engagement – Public Information and Disclosure (May 2018). Licensees and licence applicants of uranium mines and mills, Class I and applicable Class II nuclear facilities shall develop and implement a public information program that includes a disclosure protocol. The public information program and its disclosure protocol shall be commensurate with the public's perception of risk and the level of public interest in the licensed activities, which may be influenced by the complexity of the nuclear facility's lifecycle and activities, and the risks to public health and safety and the environment perceived to be associated with the facility and activities (CNSC 2018).

- REGDOC 3.2.2, Version 1.2 Public and Indigenous Engagement – Indigenous Engagement (February 2022). The CNSC identifies requirements for CNSC licensees, with respect to Indigenous engagement. It also provides guidance and information on conducting Indigenous engagement activities. The CNSC has the responsibility for fulfilling its legal duty to consult, and where appropriate, accommodate Indigenous peoples when its decisions may have an effect on potential or established Indigenous and/or treaty rights. This includes the requirement to complete an Indigenous Engagement Report (IER). This report must include a list of Indigenous groups identified for engagement, summary of engagement activities conducted to date, a description of planned Indigenous engagement activities, and a proposed schedule for reporting to the CNSC (CNSC 2022).
- Guidance on Indigenous Engagement for Proposed Projects undergoing Environmental Assessments under CEAA 2012 (E-DOC#6470679, January 2021). The guidance document is intended to assist the proponent in preparing Indigenous documentation that will satisfy CNSC's requirements for undergoing an EA under CEAA 2012 (CNSC 2021). The document includes a description of what is expected in the Environmental Impact Statement (EIS) and the IER, CNSC's requirements for the key steps in the EA process (draft and final EIS submissions), and details on how the proponent must demonstrate they have conducted adequate or complete Indigenous engagement (including instructions related to engagement methods, topics, and recording of Indigenous engagement (i.e., a record of engagement and a summary of issues and concerns by Indigenous groups).
- Generic Guidelines for the Preparation of an Environmental Impact Statement, pursuant to the Canadian Environmental Assessment Act, 2012 (May 2016). The Generic Guidelines summarize the requirements of CEAA 2012 for public participation and Indigenous engagement. The purposes of the Generic Guidelines is to ensure opportunities for meaningful public and Indigenous peoples participation during an EA and to provide the public and Indigenous peoples with opportunities to participate in the EA. Meaningful public and Indigenous participation is best achieved when all parties have a clear understanding of the proposed project as early as possible in the review process. The proponent is required to provide current information about the project to the public and Indigenous peoples and especially to the communities likely to be most affected by the project (CNSC 2016).
- Saskatchewan requirements:
  - First Nation and Métis Consultation Policy Framework (June 2010). The Government of Saskatchewan's Duty to Consult Policy states that consultation with First Nations and rights-bearing Métis communities are required prior to any decisions that may affect Treaty Rights, Aboriginal Rights, and traditional uses of land and resources. The Duty to Consult Policy is in place to advance reconciliation and promote certainty for Saskatchewan residents, including First Nations and Métis. (Government of Saskatchewan 2010).
  - Proponents Guide: Consultation with First Nations and Métis in Saskatchewan Environmental Impact Assessment – Guidelines for Engaging and Consulting with First Nations and Métis Communities in Relation to Environmental Assessment in Saskatchewan (June 2014). This document provides direction for project proponents on the Ministry of Environment's requirements for consultation with First Nations and Métis is outlined in this Government of Saskatchewan's Proponents Guide. Engagement must be carried out by the proponent during all stages of the EA. The Duty to Consult process aims to make sure all pertinent information received during engagement activities will be incorporated in the EA, the engagement process

is well-documented for the Ministry to assess if the proponent fulfilled engagement requirements, and any potential effects to Indigenous rights and traditional uses and resources have been documented and mitigated as to the best of the proponent's abilities. (Government of Saskatchewan 2014).

- Proponent Handbook – Voluntary Engagement with First Nations and Métis Communities to Inform Government's Duty to Consult Process (November 2013). The Government of Saskatchewan has a Duty to Consult with First Nations and Métis communities when there is a possibility of effects to Treaty and Aboriginal rights, or Traditional uses of lands and resources, resulting from a decision or action (Government of Saskatchewan 2013).
- Guidelines for the Terms of Reference and Environmental Impacts Statement (November 2021). This guideline provides information to assist proponents in developing a term of reference and EIS for a proposed project determined to be a development pursuant to Section 2(d) of Saskatchewan's *The Environmental Assessment Act*. The guidelines outline the staged process a proponent must follow, general EIS requirements, advice on confidentiality, and how the province and federal governments cooperate in the EA process. Template guides are provided for the terms of reference and the EIS, including information related to engagement (Government of Saskatchewan 2021).

## 1.2 Denison's Indigenous Peoples Policy and Investment and Sustainability Philosophy

In 2021, Denison announced the adoption of an Indigenous Peoples Policy (the IPP). The IPP reflects Denison's recognition of the important role of Canadian business in the process of reconciliation with Indigenous peoples in Canada and outlines Denison's commitment to take action towards advancing reconciliation. The IPP was developed based on Denison's experiences with, as well as feedback and guidance received from, Indigenous communities with whom Denison is actively engaged. This approach was designed to make sure the IPP appropriately captures a mutual vision for reconciliation. The IPP identifies five key areas of action that will support the ongoing development of a continuously evolving Reconciliation Action Plan (RAP): Engagement; Empowerment; Environment; Employment; and Education. Through the RAP, Denison is striving to interweave the principles of reconciliation throughout all areas of the company's operations (Denison 2021a).

Development of the Project will require significant capital expenditures and will represent a considerable investment. Similar to other mine sites, the development of the Project will carry significant risks (including technical and non-technical risks). During the evaluation and assessment phase, Denison will evaluate these risks, amongst others, and determine the extent to which the Project justifies the required capital investment. Denison will always weigh the investment risks related to its ability to generate a competitive economic return for its shareholders.

Denison is committed to operating the Project in a fully sustainable manner, considering not only the maintenance of high standards of safety and environmental compliance, but also financial discipline. Denison envisions a project that provides maximal benefits to employees, potentially affected communities, business partners, and Denison shareholders. This commitment will require the partnership and support of all parties with interests in, or related to, the Project.

## 1.3 Engagement Methods

Denison has applied a variety of methods to support engagement activities throughout the engagement process and used different methods with various groups depending on requirements and preferences of the process. Engagement methods have included in-person, remote (audio only, virtual, and digital), and print. These methods were aligned with key Project phases:

- Pre-Project Description (April 2016 to May 2019);
- Post-Project Description to (July 2019 to October 2022);
- Environmental assessment outcomes and relationship to licensing / approvals (October 2022 to present); and
- Future Activities (following final EIS Submission).

Engagement methods were reviewed in March 2020 in response to the initial wave of the COVID-19 pandemic. Activities that included direct in-person interaction, such as site visits, were not possible in 2020 and 2021 and necessitated a shift to remote-style engagement methods.

**Workshops/Information Sessions:** Denison hosted these types of engagement on the overall Project and the EA. Topics included general Project information, potential effects associated with Project activities, alternatives/options assessment, identification of Valued Components (VCs), preliminary effects assessment, and mitigation.

**Site Visits:** Denison coordinated and hosted site visits at the Project location (generally in the summer months).

**Meetings:** Various types of meetings, with Indigenous and non-Indigenous members, were held to learn about the Project, meet Denison and its team, and provide an opportunity to ask questions. Meetings with leadership of Indigenous and non-Indigenous communities also occurred. The purpose of the various meetings was to provide opportunities for sharing of information and to solicit feedback.

**Virtual Meetings/Presentations:** Denison adapted to the COVID-19 pandemic by hosting virtual community meetings and/or presentations.

**Presentations:** Denison made presentations to various groups and organizations to share information and seek feedback.

**Letters:** These were distributed at key junctures in the process to inform recipients of pertinent Project information and the EA process (including identifying what stage the Project was at).

**Project Website:** Denison created a Project website to provide ongoing and updated online information about the Project and the EA process, including key milestone events and engagement activities. The Project website provided another avenue for receiving feedback about the Project, including the ability to submit email comments, questions, and information requests directly through the Project website.

**Online or Mailed Survey Questionnaire:** Due to the COVID-19 pandemic, Denison used an online survey with select key Interested Party groups to receive input on VCs and baseline land and resource user information. Online surveys were advertised to the Indigenous COIs and the non-Indigenous COIs; a mailed survey was sent to Nearby Land Users.

**Supporting Media and Tools:** Denison has used local community radio stations, digital and social media, and print media to help reach a variety of audiences.

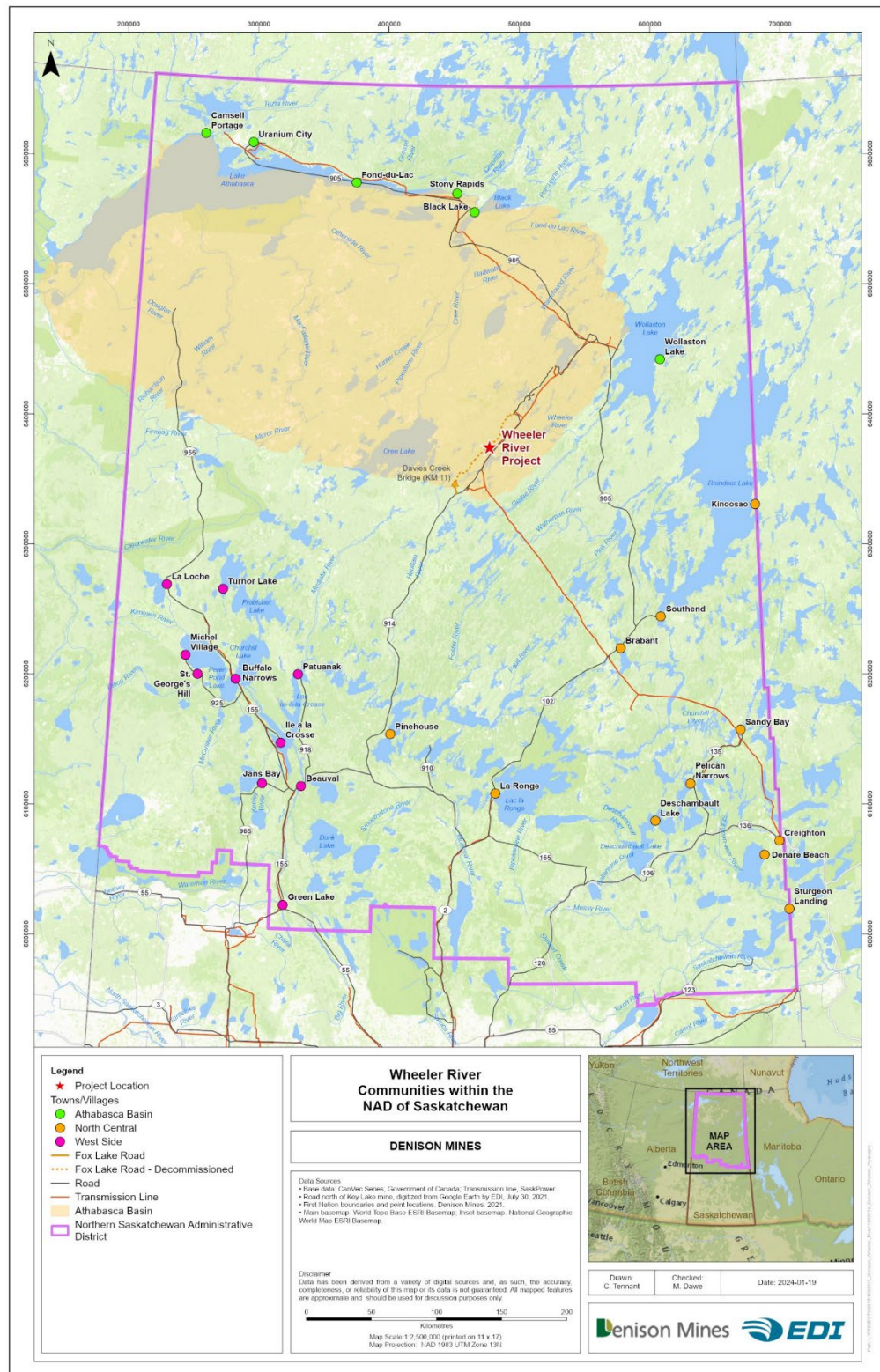
## 1.4 Engagement Recording

For each of the engagement methods described above, any perspectives that were shared with Denison were recorded and consolidated into a single Project Engagement Database. Individual comments/questions and responses were recorded and coded by one Denison staff person to ensure quality control and continuity. After this process was completed, the engagement database generated unique reports for individual subject matter specialists to support various activities. This process has resulted in a clear and documented approach towards ensuring information shared with Denison through Indigenous engagement activities is suitably understood and responded to.

## 1.5 Overview and Methodology

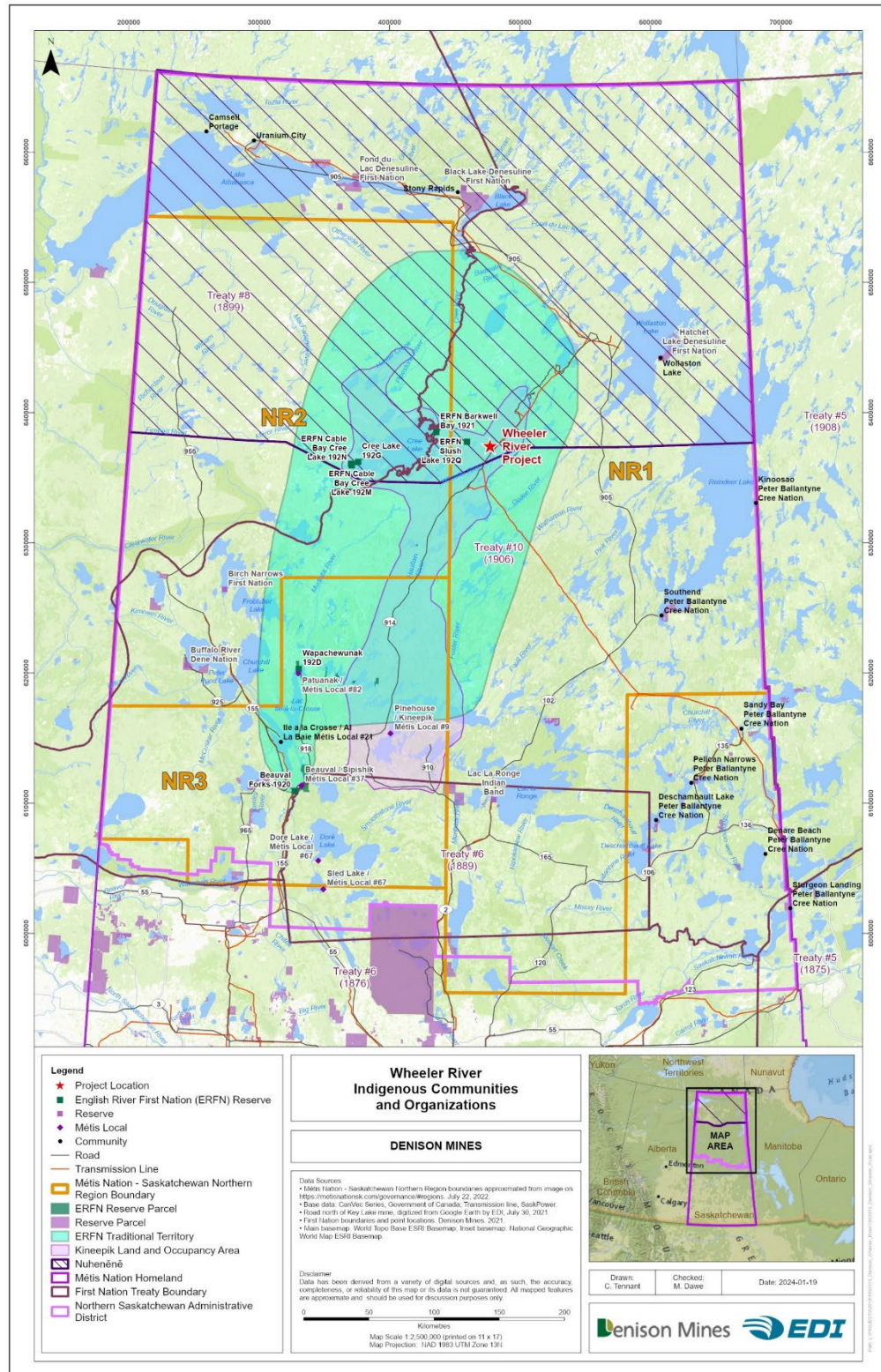
The Northern Administration District (NAD) of Saskatchewan (northern Saskatchewan) includes approximately half of Saskatchewan's land area, but less than four per cent of the province's population (Government of Saskatchewan n.d.). Northern Saskatchewan is approximately 250,000 square kilometres, or about 44% of Saskatchewan's area and is home to about 38,000 people (Statistics Canada 2017) living in approximately 45 communities, which include incorporated municipalities (such as towns, villages, hamlets, and settlements), First Nation reserves, and unincorporated areas. More than 80% of people who live in northern Saskatchewan self-identify as Indigenous. Within the NAD, the communities are roughly divided between the three regions: the Athabasca Basin region, the North Central region, and the West Side region. **Figure 1-1**, below, illustrates where these NAD communities are in relation to the Project. **Figure 1-2**, below, illustrates where identified Indigenous communities and organizations are in relation to the Project.





**Figure 1-1: Communities within the Northern Administrative District of Saskatchewan**





**Figure 1-2: Identified Indigenous Communities and Organizations in Relation to the Project**

Consistent with the history associated with other uranium mining projects located within the NAD, Denison recognizes that many Indigenous communities within the NAD typically have an interest in uranium activities, but that an approach based on appropriate criteria to determine those included in the engagement program is required.

No Indigenous communities occur in close proximity to the Project site. Calculated using a straight line, the closest Indigenous communities are approximately 150 km from the site. Travelling by existing roads, the closest Indigenous community to the Project is approximately 260 km away.

The following criteria have been used to appropriately evaluate Indigenous communities located in the NAD that would be engaged by Denison:

- Treaty 10 signatory (Treaty in which the Project is located);
- potential or established Indigenous and/or Treaty Rights within the Project Area;
- geographic proximity of community and/or reserve land to the Project site;
- known traditional territory in and around the Project site;
- history of relationship with operating companies, the CNSC, and the Province in relation to other projects located near the Project (McArthur River, Key Lake, Millennium); and
- the potential for collective exercising of Indigenous and/or Treaty Rights in proximity to the Project.

The results of the initial assessment using these criteria determined that English River First Nation (ERFN), Kineepik Métis Local #9 (KML), the Sipishik Métis Local #37, and the A La Baie Métis Local #21 would form part of Denison's initial focus for Indigenous engagement activities (see **Table 1-1**, below). These initial Indigenous groups were discussed with representatives of the Saskatchewan Ministry of Environment (SK MOE) and the CNSC. The Patuanak Métis Local #82 was added after those discussions based on further evaluation. As more information has been gained since the onset of engagement activities in 2016 regarding the various traditional land use and areas of occupancy by Indigenous groups around the Project, the list has been modified accordingly, including with respect to the reclassification of A La Baie Métis Local #21, and the addition of Hatchet Lake First Nation (HLFN). Engagement details with the current four Indigenous COI, as set out below, are also included in **Section 4.3.2** of the EIS.

**Table 1-1: Indigenous Communities of Interest and Focus of Engagement Activities**

Indigenous Communities of Interest	Brief Description of Rationale Criteria
English River First Nation	<ul style="list-style-type: none"> <li>• Treaty 10 signatory.</li> <li>• Potential or established Indigenous/Treaty Rights within the Project Area.</li> <li>• Geographic proximity of community and/or reserve land to the Project site (Slush Lake reserve approximately 16 km away; Barkwell Bay reserve 39 km away; community of Patuanak 229 km away in straight line).</li> <li>• Known traditional territory in and around the Project site, including travel routes.</li> <li>• History of relationship with operating companies, the CNSC and the Province in relation to other projects located near the Project (McArthur River, Key Lake, Millennium).</li> <li>• Potential for collective exercising of Indigenous/Treaty Rights in proximity to the Project.</li> </ul>

Indigenous Communities of Interest	Brief Description of Rationale Criteria
Kineepik Métis Local #9	<ul style="list-style-type: none"> <li>• Potential or established Indigenous/Treaty Rights within the Project Area.</li> <li>• Geographic proximity of community and/or reserve land to the Project site (233 km away).</li> <li>• Known traditional territory in and around the Project site, including travel routes.</li> <li>• History of relationship with operating companies, the CNSC and the Province in relation to other projects located near the Project (McArthur River, Key Lake, Millennium).</li> <li>• Potential for collective exercising of Indigenous/Treaty Rights in proximity to the Project.</li> </ul>
Sipishik Métis Local #37	<ul style="list-style-type: none"> <li>• Potential or established Indigenous/Treaty Rights within the Project Area.</li> <li>• Known traditional territory in and around the Project site, including travel routes.</li> <li>• Familial ties through the ERFN Membership and La Plonge reserve (immediately adjacent to Beauval).</li> <li>• Potential for collective exercising of Indigenous/Treaty Rights in proximity to the Project.</li> </ul>
Patuanak Métis Local #82	<ul style="list-style-type: none"> <li>• Potential or established Indigenous/Treaty Rights within the Project Area.</li> <li>• Known traditional territory in and around the Project site, including travel routes.</li> <li>• Familial ties through the ERFN Membership and Wapachewunak 192D reserve (immediately adjacent to Patuanak).</li> <li>• Potential for collective exercising of Indigenous/Treaty Rights in proximity to the Project.</li> </ul>
Hatchet Lake First Nation	<ul style="list-style-type: none"> <li>• Treaty 10 signatory.</li> <li>• Potential or established Indigenous/Treaty Rights within the Project Area.</li> <li>• Geographic proximity of community and/or reserve land to the Project site (150 km)</li> <li>• Known traditional territory in and around the Project site.</li> <li>• Potential for collective exercising of Indigenous/Treaty Rights in proximity to the Project.</li> </ul>

Denison has recognized other nearby Indigenous communities exist with a potential interest in the Project, including Indigenous communities that have been identified by a Regulatory Agency as having a potential interest in the Project. These Other Indigenous Communities have been identified to include Birch Narrows Dene Nation, Buffalo River Dene Nation, Lac La Ronge Indian Band, Fond du Lac First Nation, Black Lake First Nation, Dore/Sled Lake Métis Local #67, A La Baie Métis Local #21, and Peter Ballantyne Cree Nation (PBCN). Engagement details with these nine Other Indigenous Communities are included below in **Section 1.7.1** for Fond du Lac and Black Lake; **Section 1.7.2** for Birch Narrows Dene Nation; **Section 1.7.3** for Buffalo River Dene Nation; **Section 1.7.4** for Lac La Ronge Indian Band; **Section 1.7.5** for A La Baie Métis Local #21; **Section 1.7.6** for Dore/Sled Lake Métis Local #67; and **Section 1.7.7** for Peter Ballantyne Cree Nation below.

## **Indigenous Organizations**

Indigenous organizations can provide a single point of contact for Denison to share information more broadly to a wide variety of Indigenous communities and their leadership regarding project information, and company information. In many cases, these Indigenous organizations have been delegated the right to represent an Indigenous community or group of Indigenous communities in connection with the Project. These organizations can also provide specific information regarding their members, interests their members may have, and opportunities for Denison to work collaboratively together on various initiatives.

Denison has identified four Indigenous Organizations: the Métis Nation – Saskatchewan (MN-S); Ya'thi Néné Lands and Resource Office (YNLR); Meadow Lake Tribal Council (MLTC); and Prince Albert General Council (PAGC).

### **Métis Nation-Saskatchewan**

As the elected government of the Métis people of Saskatchewan, the MN-S plays an important role related to engagement activities. The MN-S is currently structured with a President, an Executive, a Provincial Métis Council, Regional Directors, and Local Presidents.

The Project is located within Métis Northern Region 1 in Saskatchewan. However, several key Métis communities with whom Denison is engaging are located in Métis Northern Region 3.

The MN-S website states that *"consultations must be with the Métis government structures that are elected and supported by the Métis people."* (MN-S n.d.c.)

Engagement with MN-S is captured below, under **Section 1.8.1**.

### **Ya'thi Néné Lands and Resource Office**

The YNLR was created as a not-for-profit organization to be the single point of contact between industry, government and the local Athabasca communities of Hatchet Lake First Nation, Black Lake First Nation, Fond du Lac First Nation, Camsell Portage, Stony Rapids, Uranium City, and Wollaston Post. Hatchet Lake First Nation is a Treaty 10 signatory.

The Project is located within the Nuhenéné (the Athabasca Denesų́líné territory). Engagement with YNLR is captured below under **Section 1.8.2**.

### **Meadow Lake Tribal Council**

According to the MLTC website, <https://www.mltc.net/about/>, *"the [MLTC] began in 1981 when the First Nations of Northwest Saskatchewan united to form the Meadow Lake District Chiefs Joint Venture. The Meadow Lake District Chiefs became officially known as the Meadow Lake Tribal Council in 1996"* (MLTC n.d.a). Meadow Lake Tribal Council represents nine Cree and Dene nations: Birch Narrows Dene Nation, Buffalo River Dene Nation, Canoe Lake Cree Nation, Clearwater River Dene Nation, ERFN, Flying Dust First Nation, Makwa Sahgaiehcan First Nation, Ministikwan Lake Cree Nation, and Waterhen Lake First Nation. Meadow Lake Tribal Council is an advocate for program delivery and services in the nine participating Nations. The Indigenous communities that overlap with the Project and are members of MLTC are Birch Narrows Dene Nation, Buffalo River Dene Nation, and ERFN. Engagement with MLTC is captured under **Section 1.8.3** of the below.

### **Prince Albert Grand Council**

According to the Prince Albert Grand Council (PAGC) website: <https://www.pagc.sk.ca/about-us/>, the Grand Council's history dates back to the 1960s when *"the twelve Chiefs of the Prince Albert District formed*



a political alliance, to collectively work together on common issues, which was formalized under the Charter of the Federation of Saskatchewan Indians" (PAGC n.d). In 1993, the name was changed to PAGC. The 12 Nations that make up PAGC are: Black Lake Denesuline Nation, Cumberland House, Fond du Lac First Nation, Hatchet Lake First Nation, James Smith Cree Nation, Lac La Ronge Indian Band, Montreal Lake Cree Nation, Peter Ballantyne Cree Nation, Red Earth Cree Nation, Shoal Lake Cree Nation, Sturgeon Lake First Nation, and Wahpetan Dakota Nation. The Indigenous communities that overlap with the Project and are members of PAGC include Black Lake Denesuline Nation, Fond du Lac First Nation, Hatchet Lake First Nation, and Lac La Ronge Indian Band. Engagement with PAGC is captured under **Section 1.8.3**, below.

## 1.6 Engagement with Indigenous Communities of Interest

As described in above in **Section 1.5**, the Indigenous COI were determined to be:

- English River First Nation (ERFN);
- Kineepik Métis Local #9 (KML);
- Sipishik Métis Local #37 (SML);
- Patuanak Métis Local #82 (PML); and
- Hatchet Lake First Nation (HLFN).

### 1.6.1 Engagement with English River First Nation (ERFN)

The English River First Nation is a Denesūliné community with ancestral lands (*nuhtsiyw-kwi-Benéne*) stretching from the Churchill River to Wapata Lake in northern Saskatchewan.

*"The ERFN name originates from the English River area, which was inhabited by the Poplar House people for periods during the year. Most of the families that now live at the Wapachewunak Reserve traditionally lived along the Churchill River system at Primeau Lake, Knee Lake, Dipper Lake and/or Cree Lake to the north (Canada North Environmental Services, 2017). Summers were spent primarily fishing along the river system. For the rest of the year, family units would spread out through the northern forests for trapping and subsistence hunting. Commonly used winter trapping areas included Haultain Lake, Costigan Lake, Foster Lake, and the area between Cree Lake and the Churchill River (Jarvenpa, 1980)." (ERFN and SVS 2022a)*

English River First Nation is a signatory to Treaty 10. English River First Nation's reserves are approximately 16 km from the Project (Slush Lake reserve); 39 km from the Project (Barkwell Bay reserve); and 229 km away (Wapachuanak Reserve, the main residential reserve for ERFN). The ERFN also has a reserve at La Plonge.

**Figure 2-1** in **Section 2**, below, illustrates where communities are in relation to the Project, both in terms of direct linear distance and travel distance.

#### 1.6.1.1 History of Interactions

Since 2016, Denison has engaged with members of the ERFN in various ways. **Appendix A-1** includes further details pertaining to all these interactions.

### **1.6.1.2 Agreements Relative to the Environmental Assessment Process**

To formalize Denison's commitment to ERFN, a Memorandum of Understanding (MOU) was signed between Denison and ERFN in 2018. This non-binding MOU formalized the intent to work together in a spirit of mutual respect to cooperate to collectively identify practical means by which to avoid, mitigate, or otherwise address potential effects of the Project upon the exercise of Indigenous Rights, Treaty Rights, and interests.

In 2021, Denison and ERFN built upon the 2018 MOU and signed a Participation and Funding Agreement and Letter of Intent, which outlined a mutually agreeable framework and applicable funding arrangements to facilitate ERFN's participation and engagement in the EA process for the Project—including ERFN's contribution to Denison's understanding of the Project in a holistic way that respected ERFN's rights and interests (Denison 2021b). As a result, several additional activities have been undertaken between ERFN and Denison, which are further described in **Section 1.6.1.3** below.

In 2023, ERFN and Denison concluded an Agreement in respect of the Project that provides, among other matters, various procedural and substantive commitments by Denison to ERFN and the support and consent of ERFN for the development and operation of the Project in a sustainable manner which respects ERFN's inherent, Aboriginal and Treaty rights, advances reconciliation with Indigenous peoples, and provides economic opportunities and other benefits to ERFN.

### **1.6.1.3 Key Engagement Activities**

During the engagement activities undertaken with ERFN, several key engagement activities have played a significant role in relation to the EA process. The main forms of engagement included meetings with Chief and Council, community meetings, a workshop on early infrastructure options (2018), a site visit (2019), virtual presentations and meetings on Valued Components (2021), two online surveys (2021 and 2022), and a meeting and information session on preliminary effects and mitigation (2022). Also in 2021, Denison met with the newly formed ERFN's Nuhtsiye-kwi Benéne (Ancestral Lands Committee) for specific input into the Project. As noted in **Section 1.3** above, due to the COVID-19 pandemic, engagement switched to virtual meetings in 2021. In mid-2022, appropriate engagement activities moved back to in-person.

The following text describes several key engagement activities in more detail. These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined in **Section 1.3**.

#### **Engagement Focus: Pre-Project Description – April 2016 to May 2019**

**Introductory meeting – July 7, 2016:** This was the inaugural meeting between members of the senior management team of Denison and the Chief of ERFN. General discussion occurred pertaining to direct employment, business opportunities, and overall planning for a meeting to occur in the community of Patuanak, for later in the month. For more specifics about this activity, please see **Appendix B**, ROC #99.

**Introductory meeting – July 27, 2016:** This was the inaugural meeting between the senior management team of Denison and ERFN Members of Wapachewunak. About 30 Members were in attendance, along with the Chief and several ERFN Councillors. Much of the meeting focussed on clarifying the nature of Denison's activities, including the Project, the interest in an agreement for the Nation in relation to any project, the interest in employment and business opportunities, the interest in protection of the environment from exploration and Project activities, questions in relation to the nuclear industry in general, and the general sharing of information pertaining to knowledge of land and wildlife in and around the Project. For more specifics about this activity, please see **Appendix B**, ROC #100.



**Workshop – May 3, 2018:** In collaboration with the Chief of ERFN, Denison hosted a workshop with several individuals representing a variety of entities within ERFN Patuanak. The focus of this engagement activity was to obtain feedback on three alternatives/options for the proposed Project: the road alignment from Highway 914 into the Project Area; the potential treated effluent discharge location; and the mining method options.

The meeting had been rescheduled several times and the attendance was minimal. The Chief attended this meeting. General questions were asked regarding the various alternatives and options, and points of clarification pertaining to aspects of the Project. Please see **Section 2** of the EIS for more details relating to project description. For more specifics about this activity, please see **Appendix B**, ROC #5.

#### **Engagement Focus: Post-Project Description – July 2019 to October 2022**

The focus of this engagement activity was to provide an in-field opportunity to understand the proposed Project and the various elements associated with the Project.

In August 2019, Denison hosted a site tour at the Project location over two separate days. Day one was a tour comprising a wide variety of Interested Parties, and included an ERFN Member. Day two was a tour with the ERFN Chief, Elders and a local ERFN Trapper. The tour involved an initial presentation regarding the Project, followed by travel around the Project site to the various locations for the proposed elements of the Project. During these site visits, ERFN commented on or queried about:

- the importance of Denison respecting their traditional territory and making sure benefits flow to ERFN;
- the proposed in situ recovery (ISR) mining method (pressures, makeup of mining solution);
- the proposed freezing method (potential concern to groundwater, understanding of the drilling process);
- the importance of working with ERFN harvesters and land users;
- the nature of the 2019 in-field test;
- effects of the proposed Project on air emissions; and
- reclamation activities.

For additional details about this activity, please see **Appendix B**, ROC#1 and ROC #140.

Engagement efforts were temporarily suspended in March 2020 as a result of the COVID-19 pandemic. As noted in **Section 1.3** above, due to the COVID-19 pandemic, engagement switched to virtual meetings in 2021. In mid-2022, appropriate engagement activities moved back to in-person.

**Meetings – March 31, 2021:** Denison hosted three virtual meetings with ERFN including with Chief and Council, with the St. Louis School (high school students), as well as a virtual meeting for ERFN Members living on the Patuanak reserve, La Plonge reserve and urban members.

The focus of these engagement activities was to provide information about the Project to the ERFN members, present a preliminary list of VCs that Denison had identified as part of the EA process, and provide an opportunity for members to provide feedback on the proposed list of VCs, and ask questions about Project components of interest or concern to them. For more specifics about these activities, please see **Appendix B**, ROC #447, 448 & 456.

The virtual meeting was advertised on the radio and social media, and posters were placed in community buildings. The Zoom platform was used for the meeting, which was also broadcasted live through the La

Plonge radio station (93.1FM). At least 24 Zoom accounts were used to attend the presentation, although it is possible that more than one person viewed the presentation from each account.

The ERFN Members meeting was held live on March 31, 2021, by Zoom. Topics covered during the presentation include the following:

- Denison company introduction and key staff members;
- introduction to regulators;
- location of the Project;
- ISR mining at the Project, including the recent change in the Project design from freeze dome technology to a freeze wall containment method;
- employment opportunities;
- environmental assessment; and
- valued components.

Meeting participants were encouraged to complete Denison's online survey in relation to the VCs considered important to ERFN Members. Following the presentation, Denison answered questions submitted through the online chat function.

Key themes that emerged from the questions posed at the ERFN meetings, which indicated either interests or concerns, are summarized below:

- Participants wanted to understand more about the ISR mining method, how it is different from other mines in the area, if this method creates tailings or other wastes, how the freeze wall works, what happens to the mining solution, and the potential effects of this method on the environment.
- Questions were also asked about the reclamation process at the Project, such as what would happen to the mining cavity and the wells once mining was completed.
- Participants wanted to know more about potential effects to the environment including effects to wildlife; effects specifically to moose and caribou populations during Construction of the mine; reclamation of the mine; issues surrounding potential contamination and clean-up; and effects to groundwater and surface water near the Project.
- Participants wanted to know if they would be able to view the EIS before the public hearings start.
- Participants asked questions about hiring practices, specifically if local companies and community members be given priority for contracts and employment.
- Questions were also asked about training; would Denison pay for training for specific jobs and would this training be transferrable to other jobs?
- Several participants raised concerns about the use of online engagement. They explained that engaging with Elders was very important and that engaging through technology is hard for some members, especially without a translator.
- Participants wanted to know what kind of benefits the community would receive from the Project, specifically collaboration agreements.
- Questions were asked about access to the land around the Project and statements were made regarding the importance that those who use land for traditional purposes continue to be able to pursue this.

Denison provided a report back to ERFN regarding what was heard by Denison during the engagement activities. This report was shared in hard copy form (sent to the ERFN Patuanak and La Plonge offices), shared with ERFN for posting to an ERFN website, posted on the Denison website ([www.wheelerriverproject.ca](http://www.wheelerriverproject.ca)), and a video was made by Denison for those who prefer oral communications, also on the Denison website. For additional details about this activity, please see **Appendix B**, ROC #447.

**Online Survey:** During and following the ERFN meeting(s), members were invited to provide feedback on VCs through an online survey. The purpose of the survey was to seek feedback on the importance of the VCs to members, and identify interests or concerns related to the Project, providing an additional mean by which feedback could be provided to Denison. Members who were unable to attend the presentation were also encouraged to provide feedback through the survey. The survey was marketed to members using Facebook and radio advertisements.

The survey was open for feedback from March 31 to April 9, 2021, for 10 days. A total of 23 responses were received, and 20 of these were considered complete, for an 87% rate of survey completion.

The survey included reach and marketing questions about how respondents heard about the survey and if they attended a presentation. This information helped Denison to determine which event marketing efforts were most effective.

The survey also asked respondents to disclose voluntary demographic information, such as age, primary residence, and identity, to help Denison determine if there were large demographic groups whose perspectives were not represented in the results.

Following the reach and marketing and demographic questions, the survey included questions specific to the preliminary list of VCs. These questions were followed by the opportunity for respondents to share their thoughts on opportunities and challenges related to the Project.

#### Demographics

A total of 21 respondents disclosed their age range. Most survey respondents (76%) were between the ages of 35 and 64, compared to 19% who were between the ages of 16 and 34.

A total of 20 respondents disclosed information about Indigenous identity. The majority (95%) of respondents identified as First Nations. The remaining respondents identified as non-Indigenous (5%). No respondents identified as Métis, or non-status.

A total of 21 participants disclosed where they live for most of the year. Most respondents live in English River (43%), followed by Patuanak (29%), and members who lived in urban areas (14%). The remaining members lived in La Plonge (5%; n=1) and “other” communities (9%; n=2).

#### Valued Components

A total of 26 interconnected VCs were proposed to respondents. Respondents were asked to select from the list which VCs they felt were important for Denison to research further as part of the EA. A total of 19 respondents identified VCs that were important to them. One respondent indicated that all the VCs were both important and not important to them. Another respondent had contradictory responses. Such responses were not included in the analysis.

While all 26 VCs were identified as important by at least one respondent, the following were identified as important by more than half of the respondents:

- traditional land and resource use;

- surface water;
- fish;
- groundwater quality;
- air quality;
- employment;
- community well-being;
- vegetation; and
- fish habitat and aquatic plants.

The VCs identified as important by the greatest number of respondents included traditional land and resource use (selected by 72% of respondents) and surface water, which was selected by 67% of respondents.

In response to why they felt the VCs they selected were important, the following themes emerged from the responses received:

- Respondents selected VCs they felt were vital to the wellbeing of the environment.
- Respondents selected VCs they felt would protect their traditional territory for future generations and would allow their traditional livelihood to continue.
- Others selected VCs related to employment opportunities and explained that there are not many opportunities in northern Saskatchewan.

The theme of protecting the land to allow future generations to continue traditional lifeways stood out as particularly important to respondents.

Six respondents identified VCs they felt were missing from the preliminary list and should be added including:

- knowledge of resource management;
- traditional food;
- consultation;
- the longevity of the land;
- working relationships (particularly between ERFN and Denison); and
- joint ventures.

Traditional food, the longevity of the land (sustainability) and joint ventures were well captured by VCs already considered by Denison. Knowledge of resource management, consultation, and working relationships have been considered by Denison as items to focus on in terms of the relationship between Denison and ERFN and regular information sharing.

The complete list of VCs included in this EIS is available in **Section 5.3.1** of the EIS.

#### Opportunities and Challenges

Respondents were asked, based on what they knew so far about the Project, to share the aspects of the Project that they felt could benefit or work well for the community. A total of 17 people responded to this question.

Some of the unique or specific opportunities mentioned included the following items:

- training opportunities;
- employment opportunities;
- opportunities for local companies (TRON and Des Nedhe);
- the possibility of royalties for the community;
- increased communications (quarterly) would be beneficial to the community, possibly through a community liaison; and
- the potential for community development and a collaborative agreement.

One respondent believed that *"no aspect of the project is beneficial to the community as it will harm the earth."*

Respondents were then asked what aspects of the Project they felt would be challenging or cause concern for their community. Themes that emerged from the 26 responses received included the following:

- potential effects from ISR mining including the use of acid, and the possibility of residual uranium leaking into the groundwater after the freeze wall has been removed;
- storage and shipping of yellowcake and other harmful substances is a concern;
- the potential effect of the Project on the environment, including on wildlife in the area around the Project;
- potential negative effects to community health;
- concern that Elders are not being consulted as most of the engagement has been through online means and without a translator;
- concerns around long-term effects on the land and the potential for this to negatively affect traditional lifeways; and
- the need for consistent communication and updates to make sure Denison is accountable and is conducting the Project with integrity and respect.

None of these themes stood out as more prevalent than others.

#### Questions and Comments

Respondents were asked if they had any questions for Denison and if there was anything else they wanted Denison to know related to the Project. Several questions were posed relating to local training and employment opportunities. A comment was made that people from northern Saskatchewan should be given priority in hiring and business opportunities.

Other questions related to Project design details, such as how Denison will make sure residual uranium will not leak into the environment.

Finally, some respondents noted the importance of engaging in non- electronic/technological ways to make sure the voices of Elders are heard. They also noted that it will be essential to have a translator.

Additionally, one respondent noted that it would be helpful to have a community office for the Project. For additional details about this activity, please see **Appendix B**, ROC #456.

**Meetings (Chief and Council and Patuanak & La Plonge Open Houses) May 3 and May 31, 2022:** On May 30 and May 31, 2022, engagement activities were undertaken at the ERFN Patuanak reserve at the Band Hall (May 30) and ERFN La Plonge reserve at the Silver Building (May 31). The ERFN La Plonge meeting was originally intended to occur at the Beauval Community Centre, but owing to a set of community circumstances, was moved to the La Plonge Reserve Silver Building. The change in venue was communicated via radio the day of the event. The focus of these engagement activities was to share the preliminary findings of the EA, proposed mitigation measures, and preliminary conclusions of the EIS, and to facilitate dialogue related to this information.

Engagement activities were conducted as a focused meetings with Chief and Council and as general open houses. Date and location of open house meetings were advertised on local radio stations, Facebook pages, TV channels, and posters. During the open houses members were able to complete a survey, in hard copy or digital format, to express their opinions. Comments and questions were also captured by Denison in a record-keeping notebook, and transcribed following the event.

To communicate EA findings and Projects details, Denison created and displayed three models and 15 informational poster boards. The three models depicted: 1) the uranium ore body and projected, below ground, extraction infrastructure; 2) the Project site surface with associated infrastructure; and 3) A 1:294 scale map of the area surrounding the Project site. The 15 informational poster boards presented EA findings in relation to VCs identified as important during previous rounds of engagement activities, as well as detail on technologies, regulatory processes, and procedures.

**Chief and Council Leadership Meeting – May 30, 2022:** The leadership meeting was held in ERFN Patuanak on May 30, 2022, with the Chief and Council. Denison provided an overview of the Project that included information on Project specifics, current status, predicted timeline, and preliminary EA findings.

The dialogue between Denison and ERFN Chief and Council highlighted several themes that primarily centered around the biophysical environment, socio-economic elements, and general technical enquiries. A general concern for environmental integrity was expressed, including mention of climate change, potential seismic activity, and monitoring as it relates to uranium decay. Inquiries relating to employment, training, and community benefits were made. Representatives from the CNSC and SK MOE were present. For additional details about this activity, please see **Appendix B**, ROC #621.

**Open House in Patuanak (ERFN Reserve) – May 31, 2022:** The open house was held at the ERFN Patuanak Band Hall, with members of the Hamlet of Patuanak welcomed to attend. A total of 31 attendees signed the sign-in sheet. Several individuals chose not to sign in, making the attendance at the ERFN Patuanak open house higher than implied by the sign-in sheet. Dialogue during the open house was largely in the form of attendees seeking clarity. The inquiries of attendees highlighted a general concern for the biophysical environment. Comments relating to ground subsistence, water quality, and environmental integrity were recurrently expressed. Questions surrounding Project specifics were often expressed in relation to concern for the biophysical environment. Multiple questions additionally related to socio-economic matters. Attendees expressed comments and inquiries relating to employment, training, accessibility, and benefit agreements. The basis of all socio-economic related dialogue appeared to highlight general focus on community and community member well-being. For additional details about this activity, please see **Appendix B**, ROC #618.

**Open House in La Plonge (ERFN Reserve) – May 31, 2022:** The open house in La Plonge was held at the Silver Building. The ERFN La Plonge members and residents of Beauval and surrounding area were

welcomed to attend. A total of 14 attendees signed the sign-in sheet. Several individuals chose not to sign in, making the attendance at the La Plonge open house higher than implied by the sign-in sheet. Spatial restraints led Denison to display only 7 poster boards. Brochures containing all poster board imagery and information were distributed, accommodating for the absent poster board information.

Dialogue during the open house expressed regard for groundwater and geology. Community members asked questions relating to methodology, inquiring as to effects of Project specifics on characteristics of groundwater and geology. Additional questions predominantly pertained to Project specific information. For additional details about this activity, please see **Appendix B**, ROC #619.

**Online Survey:** During and following the ERFN meeting(s), attendees were invited to provide feedback on preliminary effects, mitigation, and monitoring through an online survey. Denison created a survey, available in hardcopy and digital formats during each open house and in digital format for two weeks following open house meetings.

Ten survey respondents indicated that they were from ERFN, with six stating that their primary residence was ERFN Patuanak and four stating their primary residence was ERFN La Plonge, and all self-identifying as First Nation. Seven survey respondents indicated that they were within the age range of 35 to 64 years old, two indicated that they were 65 years or more, and one indicated that they were within the 16 to 34 age cohort. Five survey respondents selected the “Other” category to indicate how they heard of the survey, three selected “Word of Mouth,” one selected “Facebook,” and one selected “Radio”.

The survey was comprised of four core questions:

1. Are there any topics of particular concern that Denison needs to pay special attention to?
2. Are there any things missing that Denison should consider to reduce the effects of the Project to the environment?
3. Are there any topics that you would like to see included in monitoring plans?
4. What additional information would be helpful for you to understand the Project and its potential impacts to people and the environment?

When asked the question **“Are there any topics of particular concern that Denison needs to pay special attention to?”** responses predominantly centered around the biophysical environment. This was expressed in several ways, with three responses having some mention of the general environment, one response more specifically referencing cumulative effects through mention of climate change and the vulnerability of northern environments, and one response expressing concern over groundwater quality. Remaining topics expressed by survey respondents in relation to question one were varied, though still relate to a consideration for community context. Employment was mentioned in two instances, traditional land and resource use in two instances, community politics in one instance, and community concerns in one instance. The remaining two responses expressed that there was no topics of concern they felt afforded special attention.

When asked the question **“Are there any things missing that Denison should consider to reduce the effects of the Project to the environment?”** five survey respondents indicated that they felt there was nothing missing. Two survey respondents referenced the environment: one by simply referencing the environment, and the other by referencing the potential effect of exploration on various characteristics of the biophysical environment. While these responses did not relate to the survey question, they emphasized that maintenance of environmental integrity is important. One respondent stated, “Environmental jobs,” in response to this survey question. One survey respondent left the answer incomplete.



When asked the question **“Are there any topics that you would like to see included in the monitoring plan?”** many respondents provided unrelated responses. Of the responses that related to the survey question, one stressed the inclusion of long-term monitoring and surface water. These responses reference environmental jobs and general environmental plans. One response asked how the uranium was discovered, and another requested that ERFN communities be declared as Denison’s priority Indigenous community in relation to the Project. Two responses stressed Indigenous considerations, one stating that they would like to see Indigenous voices be part of the monitoring plan and the other stating that they would like community Elders to be liaison workers. One survey response emphasized mental health.

When asked the question **“What additional information would be helpful for you to understand the Project and its potential impacts to people and the environment?”** three respondents indicated that they did not require any additional information. Three survey responses specifically and directly related to the survey question. One respondent referenced the accessibility of information, stating that it would be helpful to provide explanations in Dene. One survey respondent suggested a community liaison worker to communicate the most current information. One survey respondent suggested to increase the number of infographics. The respondents provided unrelated answers on training and employment, family history and non-specific environmental effects, and questions regarding community benefits. One survey respondent indicated it would be helpful to have a better understanding of the environment.

The survey results were shared with the EIS discipline leads for consideration, where appropriate, in their assessments. In a few instances, the recommendations provided by survey respondents are considered as part of ongoing discussions Denison and ERFN are having, such as the need for Indigenous representation in environmental monitoring and the consideration of Elders/community members as liaisons between Denison and the Nation. For additional details about this activity, please see **Appendix B, ROC #652**.

### **Engagement Focus: Environmental Assessment and Relationship to Licensing / Approvals – October 2022 to Present**

**Site Tour – June 22, 2023:** On June 22, 2023, Denison hosted ERFN at the Project to provide an overview of the work done to date on the Project, including the 2022 and 2023 Feasibility Field Tests in support of the Project. During the site tour, an overview of the overall Project was provided, including the environmental assessment outcomes and next steps for licensing / approvals. Twenty-five ERFN Members were in attendance, including several youth and elders. The site visit opened with the Wheeler River Project site being blessed by two Elders from the ERFN.

The focus of the following engagement activities was to share the findings of the EA, mitigation measures, monitoring, significance, cumulative effects, the conclusions of the EIS, and the relationship between the environmental assessment and the ultimate licensing / approvals process for the Project.

During October 2023, ERFN held an election for Chief and Council, and as such, it was requested by ERFN that Denison not undertake in-community engagement activities.

**Meeting – December 13, 2023:** On December 13, 2023, Denison and the newly-elected ERFN Chief and Council held a meeting in which the details of the Project were shared, including the status of the regulatory process and next steps.

**Workshop – March 15, 2024:** On March 15, 2024, Denison hosted a workshop in Saskatoon with 22 members of English River First Nation, as well as ERFN’s environmental advisor, and 6 Denison staff members in attendance. The workshop focus was to provide details associated with the environmental

assessment outcomes and the relationship to licensing / approvals, and to facilitate discussion and receive feedback pertinent to these topics. Information was shared through presentation slides and information handouts. For additional details about this activity, please see **Appendix B**, ROC #1087.

**Meeting – March 26 and March 27, 2025:** On March 26, 2025, Denison met with ERFN members and leadership to confirm local fish consumption rates. On March 27, 2025, Denison met again with ERFN Members and leadership to provide an update on the Wheeler River Project.

#### **Future Engagement Activities**

Denison and ERFN have an agreed-upon process to regularly engage about ongoing matters related to the Project and the associated regulatory approval process. Denison expects to continue working with ERFN, throughout the remainder of the environment assessment and approval process and into the licensing process, to coordinate engagement activities in relation to topics of interest in relation to the Project.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

#### **1.6.1.4 Engagement Activities Associated with ERFN-Specific Processes**

As noted above in **Section 1.6.1.2**, Denison entered into a Participation and Funding Agreement and Letter of Intent with ERFN in relation to the EA process in 2021. As a result, ERFN and Denison have developed some engagement activities specific to ERFN, funded by Denison:

- 1) Early information-sharing occurred between Denison and ERFN pertaining to the scope development of various activities in relation to various components of the EA:
  - a. Denison was invited to review proposed interview questions for the studies to be undertaken by ERFN in relation to socioeconomics/health and wellness.
  - b. The ERFN was invited to review scoping materials for socioeconomic/health and wellness in relation to the assessment methodology proposed by Denison. In response to specific feedback from ERFN, Denison undertook a full assessment on a new Key Indicator called Traditional Economy. See Section 13 Economics.
  - c. The ERFN was invited to review the proposed Table of Contents and structure for the EIS in relation how they expected ERFN-authored information to be included into the EIS; the ERFN provided comments relative to this pertaining to various sections of the EIS. Denison shared the information with the discipline leads for consideration, where appropriate, in the respective sections of the EIS.
  - d. The ERFN was invited to review the proposed scope for Cumulative Effects in relation how ERFN's view of cumulative effects in ERFN's traditional territory. The ERFN provided direction to Denison that the ERFN perspective in relation to cumulative effects would include a 'lands taken up' map incorporated into the forthcoming ERFN-prepared Traditional Knowledge Study (see next point for additional details).
- 2) Preparation of ERFN-authored reports on topics determined as important by ERFN in relation to the Project:
  - a. The ERFN prepared their own independent contribution to the EIS, with assistance from Shared Value Solutions. The information from the following two reports has been shared with Denison to contribute and inform the EA:

- (a) The Wheeler River Project – Summary of Health and Socio-Economic Study Results report summarizes results from 16 interviews that were conducted for the health and socio-economic topics (ERFN and SVS 2022a).
- (b) The Wheeler River Project - Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b) presented results from 21 land use interviews, which provided both Traditional Knowledge (TK) and Local Knowledge (ERFN and SVS 2022b). The Traditional Knowledge study included maps of ERFN ecological knowledge features, personal harvesting sites, commercial harvesting sites, and occupancy sites. The Traditional Knowledge component also considered data collected with ERFN Elders in the 1980s and consideration of the cumulative nature of industry in ERFN traditional territory.

The information in the EIS with respect to the knowledge and information by and about ERFN is substantially based on the information contained in these two reports. Please see **Section 2, Table 2-1** below, for more information.

- 3) Review by ERFN of EIS information prior to filing draft EIS with Regulators:
  - a. Denison shared EIS information (in the forms of specific sections of the EIS) with ERFN prior to filing the draft EIS with the Regulators, to provide ERFN an opportunity to review information made in reference to ERFN, including that information provided to Denison in the reports authored by ERFN, as identified above. The sections shared with ERFN were:
    - i. Section 3 Indigenous and Local Knowledge;
    - ii. Section 11 Land and Resource Use;
    - iii. Section 12 Quality of Life;
    - iv. Section 13 Economics; and
    - v. Section 16 Assessment Summary and Conclusions.

During this pre-review, ERFN expressed a variety of concerns to Denison regarding:

- the geographic boundaries of the Local Study Area and Regional Study Area;
- the level of information included in the EIS relating to ERFN's Indigenous Knowledge and traditional land use activities;
- the potential effects of uranium mining and the Project and how this concern may influence certain members to be averse to using lands or resources near the Project site; and
- employment and business opportunities for ERFN and its members.

Denison addressed these concerns in a response letter to ERFN on October 7, 2022, which included a disposition table responding to each specific concern identified by ERFN. As necessary, Denison has also addressed ERFN's concerns in the relevant sections of the EIS.

#### **Nuhtsiye-kwi Benéne Committee (Ancestral Lands Committee)**

In 2021, in response to ERFN's interest in the establishment of a specific committee in relation to Denison activities and the Project, ERFN and Denison established the Nuhtsiye-kwi Benéne Committee (Ancestral Lands Committee), supported by Denison. As declared by one of the participants, during the inaugural meeting, the purpose of the Nuhtsiye-kwi Benéne Committee is *"to let Denison know how we feel, giving a voice to the people in a community in a respectful way, share information – two-way sharing."*

Over 2021, the Nuhtsiye-kwi Benéne Committee held three meetings.

#### **Inaugural Meeting – April 22, 2021**

During this inaugural meeting of the Nuhtsiye-kwi Benéne Committee, the focus was developing the purpose, vision and expectations of the Nuhtsiye-kwi Benéne Committee. General discussion occurred about the history and use of the land, and the perspectives of ERFN regarding activity that has occurred in their traditional territory. Brief discussion occurred regarding Project design considerations that would enable safe access to and around the Project site for ERFN and non-ERFN members; Denison committed to providing more details about this at the following meeting. For additional details about this activity, please see **Appendix B**, ROC #458.

#### **Project Site Access, Subsidence, Linear Feature Reclamation Pilot Program – June 15, 2021:**

During this meeting, Denison and ERFN shared information between each other regarding a number of topics related to the Project.

Denison provided a detailed discussion on the need for restrictions through the Project site for safety reasons, and where those proposed restrictions would be (i.e., gate houses). Generally, ERFN agreed with the concepts of check points in key areas of safety concern, provided that Members could access areas that were not subject to the need for restrictions (see **Section 2.2.5** of the EIS for additional details). Denison confirmed the importance of providing access to the greatest degree possible for ERFN and other Indigenous people, while respecting the need for safety for all in the area.

At the request of ERFN, Denison also provided a detailed discussion on the potential for subsidence (i.e., surface disturbance involving the gradual sinking of land due to underground activities, such as mining). Denison had commissioned a report on the potential for this and provided the results from the third-party expert. The ERFN expressed satisfaction at the information that was provided in relation to their concerns (see EIS **Section 7 Geology and Groundwater** and EIS Section 9 Terrestrial Environment for additional information about the potential for subsidence).

Denison also provided an overview of a pilot program being undertaken with respect to mitigation of *existing* cut lines in relation to reduction of predation of ungulates (i.e., moose, caribou) by wolves. General information was shared between the groups regarding knowledge pertaining to use of the area by ungulates in relation to the cut lines, and forest fire areas. While the pilot project was not related to the EA for the Project, some of the information shared by ERFN in relation to these elements have been incorporated into an understanding of the existing environment (see **Section 9** of the EIS for more information). For additional details about this activity, please see **Appendix B**, ROC #473.

#### **Exploration Activities, Update on the Project, Heritage Management Protocols – October 14, 2021:**

During this meeting, Denison provided ERFN with an overview of general exploration activities, and an update on the Project and the plans for 2021 and 2022 activities. In response to a request from ERFN, Denison presented information on the heritage assessment done for the Project and the proposed plans for responding to the identification of a heritage artifact. In this context, heritage refers to archaeological and palaeontological (precontact) items. As part of the discussion regarding the finding of artifacts, Denison committed to including a consultation element with ERFN in the Heritage Management Plan, should an artifact be found during the development of the Project (see **Section 11.3** of the EIS for more information). For additional details about this activity, please see **Appendix B**, ROC #591.

### **1.6.1.5 English River First Nation Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, the public was invited to comment on the draft EIS by the CNSC.

On Feb 22, 2023, ERFN submitted public comments on the draft EIS to the CNSC (Government of Canada 2024).

The initial ERFN public comments on the draft EIS totaled 271 technical comments. In working with ERFN and its support team, this initial list was discussed, prioritized, and summarized into 15 key areas of concern to be addressed prior to finalizing the EIS, and those areas that can be addressed in later stages of the various approvals processes. On August 18, 2023, ERFN provided Denison with specific questions in relation to these 15 key areas of concern, with a request for Denison to respond to the summary of the issues (see **Appendix B** ROC #968). On November 1, 2023, Denison provided ERFN with a technical memo providing responses to the summary of main issues as requested by ERFN (see **Appendix B** ROC #987). On November 28, 2023, Denison was notified by ERFN that ERFN had reviewed Denison's responses to their main issues and areas of concern, and were satisfied with the level of response provided by Denison at this stage of project planning (see **Appendix B** ROC #1007).

### **1.6.1.6 English River First Nation Consent for the Project**

On September 27, 2023, ERFN provided a letter to the CNSC and the Province of Saskatchewan that outlined ERFN's consent for the Project, subject to Denison materially fulfilling its commitments to ERFN. The letter further noted ERFN's intent to participate in the ongoing regulatory approval processes for the Project in a manner consistent with agreement between the two parties.

### **1.6.1.7 English River First Nation Key Interests, Issues and Concerns**

A summary of key interests, issues and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-1**. It is important to note that areas of identified interest, issues or concerns are not always related to environmental effects as defined by CEAA 2012; they can be reflective of *general* areas of interest in relation to the Project more broadly. Where appropriate, the Table aims to provide clarity with respect to this distinction.

## **1.6.2 Engagement with Kineepik Métis Local #9**

Pinehouse is the community in which Kineepik Métis Local #9 (KML) generally resides. The Kineepik Métis *"are considered Woodland Cree, Woodland Dene and Woodland Métis, although historical documents indicate that the member of (the Kineepik Métis Local) came from a diverse range of Métis, First Nations, and other backgrounds. The Northern Village of Pinehouse is located within the digitally mapped traditional territory of*

*Indigenous people of Kineepik Métis Local. (They) have used these lands surrounding Missinippi (Churchill River) watershed for gathering food, shelter, and material supplies since time immemorial.” (KML 2022).*

**Section 2 Figure 2-1**, below, illustrates where KML is in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, KML is located 230 km away from the Project. In terms of travel distance by existing transportation routes, KML is located 270 km away from the Project.

### 1.6.2.1 History of Interactions

Since 2016, Denison has been engaging with KML in a variety of ways. *“As of 2011, KML has a population of 1,600 people, of which 1,400 live on the [Northern Village of Pinehouse] municipality and 200 living either in other jurisdictions or on the land surrounding the community”* (KML 2022). In some instances, the elected officials of Métis Locals are also elected members of the municipality and, therefore, represent both their Indigenous community as well as their municipality. As a result, during the onset of engagement activities in 2016, the entities of KML and the Village of Pinehouse Lake had some overlap between each other.

In 2019, the KML delegated their Duty to Consult for the Project to the MN-S. Clear distinction between the Métis leadership and Citizens, and the Village leadership and residents was, therefore, necessary to make sure the MN-S was able to appropriately provide the representation of the Métis of KML, per the delegated Duty to Consult. As a result, Denison distinguished its engagement efforts between MN-S, on behalf of Kineepik Métis Local #9 (KML), and the general public of the Village of Pinehouse, with no intended overlap in relation to Métis interests.

In 2021, the KML revoked their delegated Duty to Consult to the MN-S. Denison re-engaged the KML directly in respect of the Project.

**Appendix A-2** includes further details pertaining to all these interactions.

### 1.6.2.2 Agreements Relative to the Environmental Assessment Process

To formalize Denison’s commitment to KML, a MOU was signed by Denison, KML, and the Village of Pinehouse Lake in 2017. The signing of this MOU with both KML and the Village of Pinehouse Lake reflected the perspective of KML and the Village of Pinehouse Lake to represent both municipal residents and the Métis Citizens co-operatively. This non-binding MOU formalized the intent to work together in a spirit of mutual respect to cooperate to collectively identify practical means by which to avoid, mitigate, or otherwise address potential effects of the Project upon the exercise of the Indigenous Rights, Treaty Rights, and interests.

In 2018, Denison, the KML, and the Village of Pinehouse Lake signed an addendum to the original MOU whereby Denison committed to financially supporting an initiative to undertake a second phase of land use and occupancy mapping representing the KML and the Village of Pinehouse Lake. This work was subsequently undertaken in 2018 and shared with Denison for use in documents in relation to regulatory proceedings associated with its activities, including the Project.

In 2019, the KML delegated their Duty to Consult for the Project to the MN-S. Thereafter, as directed, Denison engaged with MN-S on behalf of KML (and other Métis Locals who likewise delegated their Duty to Consult to MN-S).

In 2021, the KML revoked their delegated Duty to Consult to the MN-S. Denison re-engaged the KML directly in respect of the Project while continuing to engage separately with the general public of the Village of Pinehouse Lake.



In 2022, Denison and the KML built upon the 2017 MOU and signed a Participation Agreement and associated Letter Agreement, which outlined a mutually agreeable framework and applicable funding arrangements to facilitate KML's participation and engagement in the EA process for the Project—including KML's contribution to Denison's environmental understanding of the Project in a holistic way that respected KML's rights and interests. As a result, several additional activities have been undertaken between KML and Denison, which are further described in **Section 1.6.2.3** below.

In July of 2024, KML and Denison concluded an Agreement in respect of the Project that provides, among other matters, various procedural and substantive commitments by Denison to KML and the support and consent of KML for the development and operation of the Project in a sustainable manner which respects KML's inherent Aboriginal rights, advances reconciliation with Indigenous peoples, and provides economic opportunities and other benefits to KML.

### **1.6.2.3 Key Engagement Activities**

During the engagement activities undertaken with KML, several key engagement activities took place that have played a meaningful role in relation to the EA process. The main forms of engagement included meetings with leadership, community meetings, a workshop on early infrastructure options (2018), a site visit (2019), a meeting coordinated by the MN-S (2019), one online survey (2022), and a meeting and information session on preliminary effects and mitigation (2022). As noted in **Section 1.3** above, due to the COVID-19 pandemic, engagement switched to virtual meetings in 2021. In mid-2022, appropriate engagement activities moved back to in-person. The following text describes several the key engagement activities. These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined above in **Section 1.3**.

#### **Engagement Focus: Pre-Project Description – April 2016 to May 2019**

**Meeting - September 7, 2016:** Introductory meeting in Village of Pinehouse Lake: This was the inaugural meeting between the senior management team of Denison and members of KML. About 20 individuals were in attendance, along with the President of KML. Much of the meeting focussed on clarifying the nature of Denison's activities, including the Project and related exploration activities, the interest in employment and business opportunities, the interest in protection of the environment from exploration and Project activities, including consideration of cumulative effects, and questions in relation to the nuclear industry in general and the market related to uranium. For additional details about this activity, please see **Appendix B**, ROC #105.

**Workshop – January 16, 2018:** Denison hosted a workshop with grade 11 and 12 students, plus a number of community members. The focus of the workshop was to obtain feedback on three alternatives/options for the proposed Project: the road alignment from Highway 914 into the Project Area; the potential treated effluent discharge location; and the mining method options.

The focus of this engagement activity was to obtain feedback on three alternatives/options for the proposed Project: the road alignment from Highway 914 into the Project Area; the potential treated effluent discharge location; and the mining method options. For additional information about this activity, please see **Appendix B**, ROC #2.

General questions were asked regarding the various alternatives and options, and points of clarification pertaining to aspects of the Project. Feedback was collected on the various options and has been incorporated into the final design for road alignment, and the treated effluent discharge location. Please see Section 2 of the EIS for more details. For additional details about this activity, please see **Appendix B**, ROC #2.



**Engagement Focus: Post-Project Description – July 2019 to October 2022**

**Site Tour - August 23, 2019:** In August 2019, Denison hosted a site tour at the Project location. Attending the site tour was the President of KML and the Executive Director of the KML. The focus of this engagement activity was to provide an in-field opportunity to understand the proposed Project and the various elements associated with the Project.

The tour involved an initial presentation regarding the Project, followed by travel around the Project site to the various locations for the proposed elements of the Project. Representatives from the CNSC and SK MOE were present. For more information about this activity, please see **Appendix B**, ROC #1.

**Meeting – November 5, 2019:** This engagement activity was coordinated with the MN-S, in response to the delegated Duty to Consult from a number of Métis Locals as of October 2019. The focus was to provide an overview of the Project and discuss Métis interests in the Project.

Denison hosted a meeting with the MN-S President, the Northern Region 3 President, legal counsel, some administrators, and several Local Presidents and representatives, including KML in attendance. This engagement activity was coordinated with the MN-S, in response to the delegated Duty to Consult from a number of several Métis Locals as of November 2019. The focus was to provide an overview of the Project and discuss Métis interests in the Project.

See **Section 1.8.1.3**, below, for a detailed discussion on this meeting. For additional details about this activity, please see **Appendix B**, ROC #62.

Engagement efforts were temporarily suspended in March 2020 as a result of the COVID-19 pandemic. As noted in **Section 1.3**, above, due to the COVID-19 pandemic, engagement switched to virtual meetings in 2021. In mid-2022, appropriate engagement activities moved back to in-person.

During this period, Denison engaged with MN-S on behalf of KML (and other Métis Locals who likewise delegated their Duty to Consult to MN-S). See **Section 1.8.1.3**, below, for a detailed discussion of this engagement.

**Meetings (Leadership and Open House in the Village of Pinehouse) – June 1, 2022:** On June 1, 2022, engagement activities were undertaken in collaboration with KML to occur in the Village of Pinehouse Lake, in the Village Hall. The focus of these engagement activities was to share the preliminary findings of the EA, proposed mitigation measures and preliminary conclusions of the EIS, and to facilitate dialogue related to this information. The structure and layout of the meeting was jointly established between Denison and KML. Engagement activities were conducted as a focused leadership meeting with KML representatives and the Village of Pinehouse representatives (at their joint request), and as a general open house. Date and location of open house meetings were advertised on local radio stations, Facebook pages, TV channels, and posters. During the open house, members were able to complete a survey, in hard copy or digital format, to express their opinions. Comments and questions were also captured by Denison in a record-keeping notebook, and transcribed following the event.

To communicate EA findings and Projects details, Denison created and displayed three models and 15 informational poster boards. The three models depicted: 1) the uranium ore body and projected, below ground, extraction infrastructure; 2) the Project site surface with associated infrastructure; and 3) a 1:294 scale map of the area surrounding the Project site. The 15 informational poster boards presented EA findings in relation to valued components identified as important during previous rounds of engagement activities, as well as detail on technologies, regulatory processes, and procedures.

**KML and Village of Pinehouse Leadership Meeting – June 1, 2022:** The leadership meeting was held in at the Pinehouse Lake gas bar on June 1, 2022, with invited representatives of KML and the Village of

Pinehouse Lake. Denison provided an overview of the Project that included information on Project specifics, current status, predicted timeline, and preliminary EA findings.

The dialogue between Denison and the leadership related to Project specifics, including inquiries about the dimensions of the ore body and freeze wall. Questions surrounding employment and training were also expressed. A need for a culturally sensitive training model was communicated. This bridged to discussion of the reduced footprint of the Project translating to fewer employment opportunities. Leadership expressed a desire for appropriate training for community residents to adequately compete as Project related jobs become available. Representatives from the CNSC and SK MOE were present. For more information about this activity, please see **Appendix B**, ROC #623.

**Open House in Village of Pinehouse Lake – June 1, 2022:** As mentioned previously, the open house was co-planned between Denison and KML. The open house was held at the Pinehouse Community Centre, welcoming members of the surrounding area. A total of 52 attendees signed the sign-in sheet. Some individuals chose not to sign in, making the attendance at the Pinehouse open house slightly higher than recorded by the sign-in sheet. Through open house dialogue, community members expressed a general interest in the Project and Project-specific information. Questions such as “How does ISR mining work?” and “How does calcium chloride (CaCl) cool and freeze the ground?” illustrate this interest. Other questions, while primarily geared toward gaining clarity on Project specifics, suggest consideration for mitigation measures, human health, and the biophysical environment. Examples of this include questions such as “Where will the drinking water [for the camp] come from?” and inquiries over potential effects of work schedules on worker health. Representatives from the CNSC and SK MOE were present. For additional details about this activity, please see **Appendix B**, ROC #620.

**Online Survey:** During and following the meeting(s), attendees were invited to provide feedback on preliminary effects, mitigation, and monitoring through an online survey. Denison created a survey, available in hardcopy and digital formats during each open house and available in digital format for two weeks following the open house. The survey was comprised of four core questions:

1. Are there any topics of particular concern that Denison needs to pay special attention to?
2. Are there any things missing that Denison should consider to reduce the effects of the Project to the environment?
3. Are there any topics that you would like to see included in monitoring plans?
4. What additional information would be helpful for you to understand the Project and its potential impacts to people and the environment?

The 25 survey respondents indicated that they were from Pinehouse, with 15 self-identifying as Métis, nine as First Nation, and one as Indigenous without further specification. Survey respondents primarily heard of the survey through word of mouth, indicated by 10 survey respondents. Five survey respondents indicated that they heard of the survey through Facebook, and five indicated they heard of the survey through “other” means. Three respondents heard of the survey through posters, and two through radio. Most survey respondents were in the 35 to 64 age cohort, indicated in 16 instances. Five respondents indicated that they were in the 16 to 34 cohort and four indicated that they were in the 65+ age cohort.

When asked the question **“Are there any topics of particular concern that Denison needs to pay special attention to?”** five respondents provided incomplete answers. Six survey respondents expressed that they had no concerns, with statements ranging from variations of the word “no” to positive statements such as *“I think Denison covered all the main topics very well.”* Five respondents

emphasized employment and training, one of which framed this emphasis in a northern context. Five survey respondents highlighted a concern for the environment; responses included: one focused on water quality; two environmental restoration; one on the general environment; and one on mining source water treatment and runoff, presumably as it relates to the environment. One response expressed a concern over recycling. The remaining responses touched on a variety of topics. One survey respondent supplied a community benefits inquiry. Accessibility of the Project site and Project buildings was a concern for another respondent. Concern over the potential for future Covid-19 restrictions and possible vaccination requirements was expressed, though this response may be extended to include pandemic planning in general.

When asked the question **“Are there any things missing that Denison should consider to reduce the effects of the Project to the environment?”** 10 survey respondents indicated that they felt that was nothing missing. These responses, again, ranged from “no” to positive commentary such as *“No- work at Denison Mine couple shifts, like the safe orientated culture and respect of land and native people that live near the mine sites.”* One additional survey response stated *“Maybe in the future.”* This may express no concern and/or a desire for forward planning. One survey respondent directly referenced forward planning in addition to stressing the importance of wildlife, and caribou habitat management. Waste management was referenced by one respondent, emphasizing recycling and providing the suggestion of recycling paper. One survey respondent emphasized air quality, while another enquired *“Are these surface pipes [spill] ready at all times?”* One survey response suggested the inclusion of local and traditional knowledge, suggesting Denison *“learn from the people around this project.”* One survey respondent expressed concern for land users and wanted it to be affirmed that mining methods were safe. Seven survey respondents provided incomplete responses.

When asked the question **“Are there any topics that you would like to see included in the monitoring plans?”** five respondents supplied incomplete answers and nine indicated that there was nothing additional that they felt needed to be considered. Several responses did not relate to the survey question; two suggested a focus on local employment opportunities, one enquired about water quality as per human consumption and treatment, one requested more local meetings, one enquired about double plated pipes and spill readiness, one stated that someone was required to teach safety, and one requested more project context. Responses related to the survey question related to water quality, with one response simply stating water sampling and the other emphasizing monitoring of aquatic environments as well as budgeting appropriately for long-term monitoring. Similarly, another survey respondent stated “future-wise”, potentially referring to long-term monitoring or incorporating topics into the monitoring plan in a future context. One survey response indicated they would like to see ongoing reporting on Project Operation.

When asked the question **“What additional information would be helpful for you to understand the Project and its potential impacts to people and the environment?”** six indicated that no additional information was needed and five provided incomplete responses. Several survey respondents provided unrelated suggestions to this survey question. Forming mutually beneficial agreements was suggested through the response *“Always explain the motto ‘help us help you.’”* Two respondents focused on opportunities for youth, one in terms of employment and the other in terms of scholarships, and one survey respondent emphasized general opportunity for future employment. One survey respondent suggested employment considerations for people with disabilities. Waste management was focused on, with one survey respondent suggesting an increase in practice of recycling as well as questioning water quality and sampling. One respondent suggested Elder representation in decision making. Responses that related to the survey question generally suggested a need for high level information including Project timeline, more information on environmental effects, water quality changes from Project Operation, and

general Project site information including potential jobs and tasks. The importance of ongoing dialogue was emphasized in responses that suggested continued transparency and regular community meetings.

Most of the information shared with Denison regarding the above questions on the survey are suitably captured and addressed by Denison as part of the current work on the environmental assessment and the Project in general. In a few instances, the recommendations in relation to sharing of information in the future, such as with respect to environmental monitoring and employment opportunities, will be carried through into ongoing discussions between Denison and KML. For additional details about this activity, please see **Appendix B**, ROC #652.

### **Engagement Focus: Environmental Assessment and Relationship to Licensing / Approvals – October 2022 to Present**

**Site Tour - June 14, 2023:** On June 14, 2023, Denison hosted KML at the Project site to provide an overview of the work done to date on the Project, including the 2022 and 2023 Feasibility Field Test in support of the Project. During the site tour, an overview of the overall Project was provided, including the environmental assessment outcomes and next steps for licensing / approvals. Twenty-one KML representatives were in attendance, including several youth and elders.

**Meetings (Land User and Open House) – October 24, 2023:** On October 24, 2023, engagement activities were undertaken in collaboration with KML in the Village of Pinehouse Lake at the Village Hall.

The focus of these engagement activities was to share the findings of the EA, mitigation measures, monitoring, significance, cumulative effects, the conclusions of the EIS, and the relationship between the environmental assessment and the ultimate licensing / approvals process for the Project.

The structure and layout of the meeting was jointly established between Denison and KML. Engagement activities were conducted as a focused leadership meeting with KML land users, and as a general open house with a specified time period for an overview presentation. The date and location of open house meetings were advertised on local radio stations, Facebook pages, TV channels, and posters. Comments and questions were also captured by Denison in a record-keeping notebook, and transcribed following the event.

To communicate EA findings, Project details and the relationship to the licensing / approvals process, Denison displayed three models and 6 informational poster boards. The three models depicted: 1) the uranium ore body and projected below ground and extraction infrastructure; 2) the Project site surface with associated infrastructure; and 3) a 1:294 scale map of the area surrounding the Project site. The 6 informational poster boards presented EA findings and related licensing / approvals actions in relation to VCs identified as important during previous rounds of engagement activities.

**KML Land User Meeting – October 24, 2023:** The KML land user meeting was held in at the Village Hall on October 24, 2023, from 1pm to 3pm. The purpose of this meeting was to share information about the Project, with a particular focus on the flow of information from the environmental assessment into licensing, permits, and commitments. The event was planned and invitations extended as part of the process in place led by KML. Information boards and area models were displayed and information booklets were provided. Denison prepared a formal presentation, and a translator was present to translate as needed. The Canadian Nuclear Safety Commission and the Saskatchewan Ministry of Environment were invited by Denison and were in attendance.

For more information about this activity, please see **Appendix B**, ROC #979.

**Open House in Village of Pinehouse Lake – October 24, 2023:** In coordination with KML, Denison hosted an open house event in the Northern Village of Pinehouse to share information about the Project, with a

particular focus on the flow of information from the environmental assessment into licensing, permits, and commitments. Denison advertised the event with social media posts and posters around the community. In addition to members of KML, 48 residents were recorded as in attendance. Information boards and area models were displayed and information booklets were provided. Denison prepared a formal presentation, and a translator was present to translate as needed. The Canadian Nuclear Safety Commission and the Saskatchewan Ministry of Environment were invited by Denison and were in attendance. For additional details about this activity, please see **Appendix B**, ROC #978.

**Site Tour (Student) – May 7, 2024:** In coordination with Kineepik Métis Local, Denison Mines hosted a site tour at the Wheeler River Project for Pinehouse high school students.

**Meeting (Land User) – May 8, 2024:** In coordination with Kineepik Métis Local, Denison hosted a land user meeting at the Pinehouse Village Hall. The focus of the meeting was to share updates on the Wheeler River Project, to answer land user questions, to facilitate discussion, and to provide information on Project stage and licensing progression. The event was planned and invitations extended as part of the process in place led by KML. Denison prepared a presentation and distributed informational handouts to attendees. The meeting was attended by 38 land users and 4 KML staff. For additional details about this activity, please see **Appendix B**, ROC #1088.

#### **Future Engagement Activities**

Denison and KML have an agreed-upon process to regularly engage about ongoing matters related to the Project and the associated regulatory approval process. Denison expects to continue working with KML, throughout the remainder of the environmental assessment and approval process and into the licensing process, to coordinate engagement activities in relation to topics of interest in relation to the Project.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

#### **1.6.2.4 Engagement Activities Associated with KML-Specific Processes**

As noted above in **Section 1.6.2.2**, Denison entered into an MOU and Addendum in 2017 and 2018, along with a Participation Agreement in 2022. As a result, KML and Denison have developed some engagement activities specific to KML, funded by Denison:

##### **1) Land Use and Occupancy Mapping**

In 2018, the Kineepik Métis Local #9 at Pinehouse approached Denison to support a land use mapping initiative in the Project Area. The 2018 study builds on the land use mapping completed in 2011 by extending the spatial boundaries (Tobias and Associates 2018a). Methods used in the 2018 data collection are documented in Tobias and Associates (2018b) and results represent input from 128 respondents in 2011 and 55 respondents in 2018. The Tobias and Associates (2018b) methods report indicates that, collectively, the results from the 2011 and 2018 surveys represent the contemporary land base of Pinehouse residents determined “*primarily by locations where residents procure fish, birds, mammals and plant resources for direct family consumption*”. A verification meeting was held in late 2018 to make sure no geographic data gaps existed and that the results speak for the whole community.

This occupancy and land use data have been incorporated into the EIS. Please see **Table 2-2 in Section 2**, below.

##### **2) KML Valued Ecosystem Components:**



In 2022, the Kineepik Métis Local #9 (KML and NVP 2022a) prepared a report to voice their perspectives on Project valued ecosystem components. An initial draft was provided to Denison in April 2022 and a final report was provided in June 2022. Based on 12 community engagement sessions and review of the land use maps described above, the Kineepik Métis explained their unique social, cultural and historical context, expressed general support for the Project, and described issues and concerns. (KML and NVP 2022a).

This report was used throughout the EIS, where appropriate. Please see **Table 2-1** in **Section 2**, below.

### **1.6.2.5 Kineepik Métis Local #9 - Public Comments on the Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On Feb 17, 2023, KML submitted public comments on the draft EIS to the CNSC (Government of Canada 2024), consisting of 11 technical comments.

On June 11, 2023, following work undertaken together since receipt of the February 17, 2023, public comments, Denison provided KML with an updated table of issues, concerns and interests capturing engagement efforts over the years for both KML and the NVP – including Denison's responses to those issues, concerns, and interests, as associated with the Project draft EIS. KML provided feedback and stated that they were satisfied with the updated table, including Denison's responses to the issues, concerns, and interests (see **Appendix B** ROC #917).

On November 22, 2023, Denison provided KML with specific responses to KML's February 17, 2023, public comments (see **Appendix B** ROC #970). On December 5, 2023, KML confirmed to Denison that Denison's responses to the February 17, 2023, public comments had resolved KML's comments / concerns on the draft EIS and the Project (see **Appendix B** ROC #1027).

### **1.6.2.6 Kineepik Métis Local #9 Consent for the Project**

On August 1, 2024, KML provided a letter to the CNSC and the Province of Saskatchewan that outlined KML's consent for the Project, subject to Denison materially fulfilling its commitments to KML. The letter further noted KML's intent to participate in the ongoing regulatory approval processes for the Project in a manner consistent with agreement between the two parties.

### **1.6.2.7 Kineepik Métis Local #9 Key Interests, Issues and Concerns**

A summary of key interests, issues, and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-2**. It is important to note that areas of identified interest, issues or concerns are not always related to environmental effects as defined by CEAA - they can be reflective of general areas of interest in relation to the Project more broadly. Where appropriate, the table aims to provide clarity with respect

to this distinction. Additional information on key issues and concerns raised from the Northern Village of Pinehouse (NVP) can be found in **Appendix C-2**.

### 1.6.3 Engagement with Sipishik Métis Local #37

Beauval is the community in which Sipishik Métis Local #37 residents generally reside. Beauval—“Beautiful Valley”—is located in northern Saskatchewan overlooking the picturesque Beaver River Valley, providing a striking view of the river and surrounding nature. The community has a proud history of culture, language, and heritage. In history, Beauval was a trading post location along the Churchill River trade route for the Hudson’s Bay Company; this route is still traveled via canoe by history buffs and avid outdoorsman for the pristine scenes and memorable nature experience with historic influence. The trail to Fort Black was an early access route from Beauval to neighboring Île-à-la-Crosse for early settlers, trappers and fishers. The historical significance of this trail to the livelihood of the community in the past adds to the rich history of the Métis heritage and culture of Beauval, Saskatchewan (MN-S n.d.a).

**Section 2 Figure 2-1**, below, illustrates where Sipishik Métis Local #37 is in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, SML is located 295 km away from the Project. In terms of travel distance by existing transportation routes, SML is located 375 km away from the Project.

#### 1.6.3.1 History of Interactions

Since 2016, Denison has been engaging with Sipishik Métis Local #37 (SML) in a variety of ways. The Northern Village of Beauval, and many of the community members residing in Beauval, self-identify as Métis. In some instances, the elected officials of Métis Locals are also elected members of the municipality and, therefore, represent both their Indigenous community as well as their municipality. As a result, during the onset of engagement activities in 2016, the entities of SML and the Village of Beauval had some overlap.

In 2019, the SML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing SML in respect of engagement with Denison for the Project. Clear distinction between the Métis leadership and Citizens, and the Village leadership and residents was, therefore, necessary to make sure the MN-S was able to appropriately provide the representation of the Métis of SML, per the delegated Duty to Consult. As a result, Denison focussed engagement efforts exclusively toward the general public of the Village of Beauval onwards from this point, with no intended overlap in relation to Métis interests.

**Appendix A-3** includes further details pertaining to all these interactions.

#### 1.6.3.2 Agreements Relative to the Environmental Assessment Process

To formalize Denison’s commitment to SML, a MOU was signed by Denison, SML and the Village of Beauval in 2018. The signing of this MOU with both SML and the Village of Beauval reflected the perspective of SML and the Village of Beauval to represent both municipal residents and the Métis Citizens co-operatively. This non-binding MOU formalized the intent to work together in a spirit of mutual respect to cooperate to collectively identify practical means by which to avoid, mitigate, or otherwise address potential effects of the Project upon the exercise of the Indigenous Rights, Treaty Rights, and interests, to the extent they are identified in relation to the Project.

In 2019, SML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing SML in respect of engagement with Denison for the Project.



### 1.6.3.3 Key Engagement Activities

During the engagement activities undertaken with SML, the main forms of engagement included meetings with leadership, a community meeting, a workshop on early infrastructure options (2018), and a site visit (2019) and a meeting coordinated by the MN-S (2019). These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined above, in **Section 1.3**.

#### **Engagement Focus: Pre-Project Description – April 2016 to May 2019**

**Introductory Meeting in the Village of Beauval - December 6, 2016:** This was the inaugural meeting between the senior management team of Denison and various entities associated with SML and the Village of Beauval. Much of the meeting focussed on clarifying the nature of Denison's activities, including the Project and related exploration activities, the interest in employment and business opportunities, opportunities and considerations for the long-term, and questions in relation to the nuclear industry in general and the market related to uranium. For more information about this activity, please see **Appendix B**, ROC #107.

**Workshop – January 18, 2018:** Denison hosted a workshop with several community members. The focus of the workshop was to obtain feedback on three alternatives/options for the proposed Project: the road alignment from Highway 914 into the Project Area; the potential treated effluent discharge location; and the mining method options. General questions were asked regarding the various alternatives and options, and points of clarification pertaining to aspects of the Project. Feedback was collected on the various options and has been incorporated into the final design for road alignment, and the treated effluent discharge location. Please see Section 2 of the EIS for more details. For additional details about this activity, please see **Appendix B**, ROC #4.

#### **Engagement Focus: Post-Project Description – July 2019 to October 2022**

**Site Tour – August 23, 2019:** In August 2019, Denison hosted a site tour at the Project location. The focus of this engagement activity was to provide an in-field opportunity to understand the proposed Project and the various elements associated with the Project.

Attending the site tour was the Vice President of SML. The tour involved an initial presentation regarding the Project, followed by travel around the Project site to the various locations for the proposed elements of the Project. Representatives from the CNSC and SK MOE were present. For more information about this activity, please see **Appendix B**, ROC #1.

**Meeting – November 15, 2019:** Denison hosted a meeting with the MN-S President, the Northern Region 3 President, legal counsel, some administrators, and several Local Presidents and representatives, including SML in attendance. This engagement activity was coordinated with the MN-S, in response to the delegated Duty to Consult from several Métis Locals as of October 2019. The focus was to provide an overview of the Project and discuss Métis interests in the Project.

See **Section 1.8.1.3**, below, for a detailed discussion on this meeting. For more specifics about this activity, please see **Appendix B**, ROC #62.

In 2019, SML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing SML in respect of engagement with Denison for the Project. For details on Denison's engagement with MN-S, see **Section 1.8.1**, below.

### **Future Engagement Activities**

Denison expects to continue working with the SML through the MN-S, throughout the remainder of the environmental assessment and approval process and into the licensing process, to coordinate engagement activities in relation to topics of interest in relation to the Project in accordance with an agreed-upon process.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

#### **1.6.3.4 Sipishik Métis Local #37 Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 3, 2023, the MN-S submitted public comments on the draft EIS to the CNSC (Government of Canada 2024). As SML delegated their duty to consult to the MN-S, engagement on issues related to the environmental assessment are now represented by the MN-S.

On December 1, 2023, following work undertaken with the MN-S since receipt of the March 3, 2023, public comments, Denison provided responses to the MN-S' public comments made on the draft EIS (please see **Appendix B ROC #973**).

During this same time period, Denison and the MN-S met regularly to discuss the advancement of the Métis Knowledge Study and to discuss items in relation to the development of a MN-S defined process for engagement on the Project, including in relation to the resolution of the MN-S public comments and general issues and concerns. One of the key areas of concern raised by the MN-S was the inclusion of information obtained as a result of the completion of the Métis Knowledge Study into the EIS. The Métis Knowledge Study was received by Denison on October 24, 2023 and Denison has integrated relevant information from the Study into the EIS accordingly.

On March 31, 2025, the MN-S notified the CNSC that they had outstanding issues in relation to the Project and the associated process. Generally, the issues raised were: (i) concerns regarding stigma, contamination and residual impacts, (ii) basement rock permeability, (iii) losses to Métis title, the value of the uranium resource, and the socio-economic value through the extraction of that resource, (iv) effects on harvesting/fish through impacts to Whitefish and Russel Lake, (v) monitoring of ongoing impacts, and (vi) the consent process (please see **Appendix B ROC #1244**). Denison and the MN-S met in late April to discuss these outstanding issues.

On June 3, 2025, as a follow up to their previous meeting, Denison provided to the MN-S an outline of their commitments in respect to these outstanding issues (please see **Appendix B ROC #1223**). On July 31, 2025, the MN-S responded indicating these issues remained unresolved. The MN-S shared that they felt Denison's and the Crown's engagement to be insufficient, and requested additional information on

basement rock permeability, for Denison to confirm their commitment to collaborative monitoring, and for Denison to confirm the details of the socioeconomic assessment considerations (please see **Appendix B ROC #1245**).

All efforts and outcomes in relation to future efforts will be documented in future iterations of the IER.

For more information about the work undertaken with the MN-S, please see **Section 1.8.1**.

### **1.6.3.5 Sipishik Métis Local #37 Key Interests, Issues and Concerns**

A summary of key interests, issues, and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-3**. It is important to note that areas of identified interest, issues or concerns are not always related to environmental effects as defined by CEAA 2012 (the regime under which the Project is undergoing regulatory assessment) - they can be reflective of general areas of interest in relation to the Project more broadly. Where appropriate, the table aims to provide clarity with respect to this distinction. As SML delegated their duty to consult to the MN-S in late 2019, the table is representative to the timeframe prior to the delegation of the duty to consult by the SML to the MN-S. Additional information on key issues and concerns raised from the NVB can be found in **Section 4.4 of the EIS**.

## **1.6.4 Engagement with Patuanak Métis Local #82**

Patuanak is the community in which Patuanak Métis Local #82 (PML) generally resides. As of the June 2022, there were 14 registered Citizens associated with PML. Patuanak is a community in northern Saskatchewan, Canada. It is the administrative headquarters of the ERFN reserve near Churchill River and the north end of Lac Île-à-la-Crosse. In Dene, it sounds similar to Boni Cheri (Bëghànìch'ërë). The community consists of the Northern Hamlet of Patuanak with 64 residents governed by a Mayor and three Councillors and the adjoining Wapachewunak 192D reserve of the English River Dene Nation with 482 residents (Canada Census 2011). Patuanak is about 92 km (57 miles) north of Beauval at the end of Highway 918.

**Section 2 Figure 2-1**, below, illustrates where Patuanak is in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, PML is located 230 km away from the Project. In terms of travel distance by existing transportation routes, PML is located 460 km away from the Project.

### **1.6.4.1 History of Interactions**

Before 2019, Denison undertook engagement activities in the Patuanak area (including with Patuanak Métis Local #82) more broadly through work done in relation to the ERFN Wapachewunak reserve, consistent with the strong interconnections in the area. In mid-2019, Denison was advised by the Province of Saskatchewan of the interest of PML in relation to the Project. As a result, beginning June 2019, Denison began engaging directly with PML. This included sending correspondence to PML about the Project description, having informal discussions pertaining to their interests in the Project, and hosting a site visit (2019) and a meeting jointly coordinated by the MN-S (2019).

In 2019, the PML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing PML in respect of engagement with Denison for the Project. Since then, Denison has been engaging with MN-S on behalf of PML and other Métis Locals. For details of this engagement, see **Section 1.8.1**, below. The following section summarizes engagement activities that occurred with Denison and PML in 2019. **Appendix A-4** includes further details pertaining to all these interactions.

These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined above, in **Section 1.3**.

#### **1.6.4.2 Key Engagement Activities**

##### **Engagement Focus: Post-Project Description – April 2016 to May 2019**

**Site Tour- August 23, 2019:** In August 2019, Denison hosted a site tour at the Project location. The focus of this engagement activity was to provide an in-field opportunity to understand the proposed Project and the various elements associated with the Project.

Attending the site tour was the President of PML. The tour involved an initial presentation regarding the Project, followed by travel around the Project site to the various locations for the proposed elements of the Project. Representatives from the CNSC and SK MOE were present.

For more information about this activity, please see **Appendix B**, ROC #1.

**Meeting – November 5, 2019:** Denison hosted a meeting with the MN-S President, the Northern Region 3 President, legal counsel, some administrators, and several Local Presidents and representatives, including PML in attendance. This engagement activity was coordinated with the MN-S in response to the delegated Duty to Consult from several Métis Locals as of November 2019. The focus was to provide an overview of the Project and discuss Métis interests in the Project. See **Section 1.8.1.3**, below, for a detailed discussion on this meeting. For more specifics about this activity, please see **Appendix B**, ROC #62.

In 2019, PML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing PML in respect of engagement with Denison for the Project. For details on Denison's engagement with MN-S, see **Section 1.8.1**, below.

##### **Future Engagement**

Denison expects to continue working with the PML through the MN-S, throughout the remainder of the environmental assessment and approval process and into the licensing process, to coordinate engagement activities in relation to topics of interest in relation to the Project in accordance with an agreed-upon process.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

#### **1.6.4.3 Patuanak Métis Local Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 3, 2023, the MN-S submitted public comments on the draft EIS to the CNSC (Government of Canada 2024). As PML delegated their duty to consult to the MN-S, engagement on issues related to the environmental assessment are now represented by the MN-S.

On December 1, 2023, following work undertaken with the MN-S since receipt of the March 3, 2023, public comments, Denison provided responses to the MN-S' public comments made on the draft EIS (please see **Appendix B ROC #973**).

During this same time period, Denison and the MN-S met regularly to discuss the advancement of the Métis Knowledge Study and to discuss items in relation to the development of a MN-S defined process for engagement on the Project, including in relation to the resolution of the MN-S public comments and general issues and concerns. One of the key areas of concern raised by the MN-S was the inclusion of information obtained as a result of the completion of the Métis Knowledge Study into the EIS. The Métis Knowledge Study was received by Denison on October 24, 2023 and Denison has integrated relevant information from the Study into the EIS accordingly.

On March 31, 2025, the MN-S notified the CNSC that they had outstanding issues in relation to the Project and the associated process. Generally, the issues raised were: (i) concerns regarding stigma, contamination and residual impacts, (ii) basement rock permeability, (iii) losses to Métis title, the value of the uranium resource, and the socio-economic value through the extraction of that resource, (iv) effects on harvesting/fish through impacts to Whitefish and Russel Lake, (v) monitoring of ongoing impacts, and (vi) the consent process (please see **Appendix B ROC #1244**). Denison and the MN-S met in late April to discuss these outstanding issues.

On June 3, 2025, as a follow up to their previous meeting, Denison provided to the MN-S an outline of their commitments in respect to these outstanding issues (please see **Appendix B ROC #1223**). On July 31, 2025, the MN-S responded indicating these issues remained unresolved. The MN-S shared that they felt Denison's and the Crown's engagement to be insufficient, and requested additional information on basement rock permeability, for Denison to confirm their commitment to collaborative monitoring, and for Denison to confirm the details of the socioeconomic assessment considerations (please see **Appendix B ROC #1245**).

All efforts and outcomes in relation to future efforts will be documented in future iterations of the IER. For more information about the work undertaken with the MN-S, please see **Section 1.8.1**.

#### **1.6.4.4 Patuanak Métis Local Key Interests, Issues and Concerns**

A summary of key interests, issues, and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-4**. It is important to note that areas of identified interest, issues, or concerns are not always related to environmental effects as defined by CEAA 2012 (the regime under which the Project is undergoing regulatory assessment) - they can be reflective of *general* areas of interest in relation to the Project more broadly. Where appropriate, the table aims to provide clarity with respect to this distinction. As PML delegated their duty to consult to the MN-S in late 2019, the table is representative to the timeframe prior to the delegation of the duty to consult by the PML to the MN-S.

#### **1.6.5 Engagement with Hatchet Lake First Nation**

On March 18, 2019, YNLR sent a letter to Denison directing Denison to undertake engagement and communication solely with YNLR for the purposes of any activities requiring approval actions from the Athabasca Denesųłiné, such as the EA for the Project. The letter explicitly stated:

*“Please be advised that in relation to all new and ongoing mining, milling, exploration, forestry, road building and other industrial and non-industrial developments and activities for which a federal or provincial licensing permit, regulatory process, environmental assessment or other approval is required the sole point of contact for Black Lake First Nation, Fond du Lac First Nation, Hatchet Lake First Nation, Stony Rapids, Wollaston Lake, Camsell Portage and Uranium City is to be the Ya'thi Néné Lands and Resource Office. Accordingly, we direct you to communicate solely with Ya'thi Néné Lands and Resource Office in all related matters and our staff will be in direct contact with the First Nations and Municipal communities as it relates to activities in the Athabasca Basin and the Athabasca First Nations traditional territory.”*

As a result, Denison's engagement activities with the Hatchet Lake First Nation have been undertaken through engagement activities with the YNLR. Please see **Section 1.8.2** for a full discussion on these activities.

Hatchet Lake First Nation is a signatory to Treaty 10. **Section 2 Figure 2-1** illustrates where the communities are in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, Hatchet Lake First Nation is located 150 km away from the Project. In terms of travel distance by existing transportation routes Hatchet Lake First Nation is located 945 km away from the Project.

## 1.7 Engagement with Other Indigenous Communities

As noted in **Section 1.5**, above, engagement with Other Indigenous Communities focused on Indigenous communities with a potential interest in the Project, which may include any Indigenous community identified by a Regulatory Agency as having a potential interest in the Project.

As described in **Section 1.5**, above, these Other Indigenous Communities include the following:

- Fond du Lac First Nation;
- Black Lake First Nation;
- Birch Narrows Dene Nation;
- Buffalo River Dene Nation;
- Lac La Ronge Indian Band;
- A La Baie Métis Local;
- Dore/Sled Lake Métis Local #67; and
- Peter Ballantyne Cree Nation.

### 1.7.1 Engagement with Fond du Lac First Nation and Black Lake First Nation

On March 18, 2019, YNLR sent a letter to Denison directing Denison to undertake engagement and communication solely with YNLR for the purposes of any activities requiring approval actions from the Athabasca Denesųliné, such as the EA for the Project. The letter explicitly stated:

*“Please be advised that in relation to all new and ongoing mining, milling, exploration, forestry, road building and other industrial and non-industrial developments and activities for which a*



*federal or provincial licensing permit, regulatory process, environmental assessment or other approval is required the sole point of contact for Black Lake First Nation, Fond du Lac First Nation, Hatchet Lake First Nation, Stony Rapids, Wollaston Lake, Camsell Portage and Uranium City is to be the Ya'thi Néné Lands and Resource Office. Accordingly, we direct you to communicate solely with Ya'thi Néné Lands and Resource Office in all related matters and our staff will be in direct contact with the First Nations and Municipal communities as it relates to activities in the Athabasca Basin and the Athabasca First Nations traditional territory."*

As a result, Denison's engagement activities with the Fond du Lac First Nation, and Black Lake First Nation have been undertaken through engagement activities with the YNLR. Please see **Section 1.8.2**, below, for a full discussion on these activities.

Black Lake First Nation is a signatory to Treaty 8. Fond du Lac First Nation is a signatory to Treaty 8. **Section 2 Figure 2-1**, below, illustrates where the communities are in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, Hatchet Lake First Nation is located 150 km away from the Project. In terms of direct linear distance, Black Lake First Nation is located 180 km away from the Project. In terms of travel distance by existing transportation routes Black Lake First Nation is located 1130 km away from the Project. In terms of direct linear distance, Fond du Lac First Nation is located 230 km away from the Project. In terms of travel distance by existing transportation routes Fond du Lac First Nation is more than 1,200 km away, a portion of which is only accessible via winter road.

## 1.7.2 Engagement with Birch Narrows Dene Nation

Birch Narrows Dene Nation (BNDN) has territory at three (3) sites: 1) Turnor Lake 193B with 296.7 hectares (733 acres) 56.4726°N 108.6869°W, which adjoins the Northern Hamlet of Turnor Lake; 2) Churchill Lake 193A with 159.8 hectares (395 acres), which contains the historic site of Clear Lake 56.1408°N 108.2072°W at the junction of Churchill Lake and Frobisher Lake; 3) Turnor Lake 194 with 2,445.9 hectares (6,044 acres) 55.9353°N 108.8450°W, which is on Peter Pond Lake east of Dillon (MLTC n.d.a).

Birch Narrows Dene Nation is a signatory to Treaty 10. **Section 2 Figure 2-1**, below, illustrates where the community is in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, BNDN is located 230 km away from the Project. In terms of travel distance by existing transportation routes BNDN is located 570 km away from the Project.

### 1.7.2.1 History of Interactions

With respect to the Project, BNDN was identified by the CNSC in 2019 as potentially interested in the Project. Since 2019, Denison has shared information with BNDN about the Project, with offers to meet and share information between each other about the Project and potential Treaty Rights in relation to the Project. Engagement efforts were temporarily suspended in March 2020 as a result of the COVID-19 pandemic.

In May 2021, BNDN informed the CNSC that they were interested in being consulted by the Crown. This correspondence was copied to Denison, following which Denison offered to meet with BNDN to provide information in relation to the Project. Denison did not receive a response from BNDN to this offer. In May 2022 a BNDN Councillor connected with Denison seeking information about the Project and Denison provided them all information that was requested.



On October 27, 2022, BNDN sent a letter to Denison accepting Denison's earlier offers to meet regarding the Project. The letter further identified that BNDN was concerned about the potential impacts to water, wildlife, and medicines from the Project and requested Denison enter into a process agreement between Denison and BNDN.

On November 11, 2022, Denison responded to BNDN's October 27, 2022, letter. Denison identified its willingness to meet with BNDN to provide an overview of the Project to better understand BNDN's interests in relation to the Project, before entering into a process agreement with BNDN.

Over the course of the next few months, Denison and BNDN worked together to establish a mutually agreeable time that would work for a meeting.

On February 14, 2023, Denison and BNDN met in person, whereby Denison provided an overview of the Project and the related environmental assessment, the valued components for the Project, the Project technologies, and the schedule. During the meeting, several clarification questions were asked of Denison with respect to the Project. During the meeting BNDN stated that Denison was in the traditional territory of BNDN and had land use information in relation to the Project, and BNDN would share the information with Denison provided that Denison entered into a confidentiality agreement with BNDN. Denison indicated its willingness to do so, and reiterated its interest in receiving information from BNDN regarding BNDN activities in and around the Project (see **Appendix B** ROC #851).

Following the February 14, 2023, meeting, Denison and BNDN connected about the request from BNDN to enter into a confidentiality agreement in order for Denison to receive the traditional territory information and land use data pertinent to the Project. BNDN also requested that Denison fund a process to develop a Project agreement. On April 25, 2023, Denison provided BNDN with a draft confidentiality agreement for their review and consideration. To date, a confidentiality agreement has not been entered into between the parties.

On May 10, 2023, Denison and BNDN met virtually to discuss next steps with respect to the Project. Denison reiterated its interest in receiving BNDN information in respect of BNDN uses of the land in and around Wheeler prior to making a determination about entering into further agreements with BNDN. BNDN suggested that the information that could be shared would be limited because Denison was not providing funding in respect of the existing information. On May 11, 2023, Denison provided BNDN a copy of the meeting notes from May 10, 2023, and they were confirmed as received.

On July 31, 2023, Denison met with BNDN to discuss next steps and moving forward to resolve BNDN's concerns raised about the Project. A course of action was recommended, which involved Denison responding to the March 3, 2023, public comments from BNDN, as well as providing a high-level summary of the broader potential impacts to people and the environment. See below for more information about these next steps.

On November 1, 2024, Denison mailed BNDN a letter of notice to share the status of the Environmental Impacts Statement per the provincial regulatory process (See **Appendix B**, ROC#1147). Denison then sent a letter to BNDN with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.

### **Future Engagement**

Denison will continue to engage with BNDN about their remaining issues and concerns in respect of the Project. All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

**Appendix A-5** includes further details pertaining to all these interactions.

### **1.7.2.2 Birch Narrows Dene Nation Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators, and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 3, 2023, BNDN provided public comments on the draft EIS for the Project (Government of Canada 2024), consisting of 88 technical comments. On November 29, 2023, following work undertaken with BNDN since receipt of the March 3, 2023, public comments (as described above), Denison provided responses to the BNDN public comments made on the draft EIS (please see **Appendix B** ROC #972).

On January 18, 2024, BNDN sent correspondence to Denison advising that Denison's responses to BNDN's public comments on the EIS had been deemed adequate, and that BNDN looked forward to receiving information about the progress of the Project in the future (please see **Appendix B** ROC #1036).

On March 3, 2025, BNDN sent a letter to Denison rescinding its previous position. BNDN articulated its 78 outstanding concerns in respect of the Project in May 2025, noting some issues had been adequately addressed by Denison, and others issues remained unaddressed (**Appendix B**, ROC #1222).

In May and July 2025, Denison sent letters to BNDN in respect of its correspondence from March and May, 2025. In this correspondence, Denison reiterated its interest in setting up a meeting to further discuss with BNDN to which BNDN did not respond. Denison has committed to providing BNDN additional information in respect of their May 2025 correspondence (**Appendix B**, ROC#1225).

Denison will continue to engage with BNDN about their remaining issues and concerns in respect of the Project. .

### **1.7.2.3 Birch Narrows Dene Nation Key Interests, Issues and Concerns**

A summary of key interests, issues, and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-5**. It is important to note that areas of identified interest, issues or, concerns are not always related to environmental effects as defined by CEAA 2012 (they can be reflective of general areas of interest in relation to the Project more broadly). Where appropriate, the table aims to provide clarity with respect to this distinction.

### 1.7.3 Engagement with Buffalo River Dene Nation

Dillon is a village in the boreal forest of northern Saskatchewan, Canada. It is located on the western shore of Peter Pond Lake at the mouth of the Dillon River. The village is the administrative headquarters of the Buffalo River Dene First Nation (BRDN) and is accessed by Highway 925 from Highway 155 (MLTC n.d.b.).

The North West Company had a post near Dillon in 1790. It was called Lac des Boeufs Post (Buffalo Lake Post). In 1932 the name of the village of Buffalo River was officially changed to Dillon, the name of the river was changed from Buffalo River to Dillon River, and Buffalo Lake was renamed Peter Pond Lake.

Buffalo River Dene Nation is a signatory to Treaty 10. **Section 2 Figure 2-1**, below, illustrates where the community is in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, BRDN is located 285 km away from the Project. In terms of travel distance by existing transportation routes BRDN is located 540 km away from the Project.

#### 1.7.3.1 History of Interactions

With respect to the Project, BRDN was identified by the CNSC in 2019 as having a potential interest in the Project. Since 2019, Denison has shared information with BRDN about the Project, with offers to meet and share information between each other about the Project and potential Treaty Rights in relation to the Project. Engagement efforts were temporarily suspended, along with the EA, in March 2020 as a result of the COVID-19 pandemic. In 2021, Denison advised BRDN about the EA restart. As of January 2024, Denison has not received any engagement from BRDN to Denison expressing interests, issues, or concern.

Denison remains willing to engage with BRDN regarding the Project to the extent BRDN expresses interest in doing so.

**Appendix A-6** includes further details pertaining to all these interactions.

### 1.7.4 Engagement with Lac La Ronge Indian Band

Located in north-central Saskatchewan, the Lac La Ronge Indian Band (LLRIB) is the largest First Nation in Saskatchewan, and one of the 10 largest in Canada, with a population of 11,602, as of March 31, 2022. The LLRIB reserve lands extend from rich farmlands in central Saskatchewan, all the way north through the boreal forest to the mighty Churchill River and beyond. The central administration office for LLRIB is located in La Ronge, 241 km north of Prince Albert, on the edge of the Pre-Cambrian Shield. (Lac La Ronge Indian Band, n.d.)

The LLRIB is a signatory to Treaty 6. LLRIB has several reserves, such as Hall Lake, Stanley Mission, Grandmothers' Bay and others. The administrative centre for the LLRIB is located adjacent to La Ronge and Air Ronge. **Section 2 Figure 2-1**, below, illustrates where this LLRIB reserve is in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, this location is 265 km away from the Project. In terms of travel distance by existing transportation routes, this location is 480 km away from the Project.

#### 1.7.4.1 History of Interactions

With respect to the Project, engagement with the LLRIB started in December 2019 when they were informed about the Project and expressed an interest in learning more. A presentation was made at a

meeting to the Lac La Ronge Indian Band Lands and Resources Sub-committee in February 2020. Notification of the temporary suspension of the EA in March 2020 as a result of the COVID-19 pandemic was communicated, as well as status updates later in 2020 and the restart of the EA in January 2021. Since then, Denison has been willing to engage with LLRIB at their request. **Appendix A-7** includes further details pertaining to all these interactions.

In early 2023, the LLRIB contacted the CNSC about the Project. As an outcome of this contact, LLRIB requested the shapefiles for the Project from Denison.

In February 2023 Denison and LLRIB discussed LLRIB's interest in the Project, including in relation to LLRIB's trapping activities in the area. Denison clarified to LLRIB that the Project is located in the ERFN N-18 Furblock, and outside the LLRIB Traditionally Occupied Territory available publicly online. Denison committed to attending a LLRIB Lands and Resources Board meeting at a time that was mutually convenient.

On August 30, 2023, Denison attended, both in person and virtually, the LLRIB Land and Resources Board meeting to provide an update on the Project and provided information in response to issues raised by LLRIB during the public review of the draft EIS for the Wheeler River Project (see **Appendix B**, ROC #956).

On June 12, 2024, Denison met with the Lac La Ronge Lands and Resource Board for an in-person meeting in Saskatoon, for the purpose of providing Wheeler River Project updates, as requested by LLRIB, to support the resolution of LLRIB's comments made of the draft EIS.

On November 1, 2024, Denison mailed LLRIB a letter of notice to share the status of the Environmental Impacts Statement per the provincial regulatory process (**See Appendix B**, ROC#1147). Denison then sent a letter to LLRIB on April 17, 2025, with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.

### **Future Engagement Activities**

Denison will continue to ensure LLRIB is informed about the progression of the Project and will be responsive to LLRIB's future interests in the Project.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

#### **1.7.4.2 Lac La Ronge Indian Band Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by the federal regulators, and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On February 9, 2023, LLRIB submitted public comments on the draft EIS to the CNSC (Government of Canada 2024).

On November 4, 2023, following work undertaken with LLRIB since receipt of the February 9, 2023, public comments (as described above), Denison provided responses to the LLRIB public comments made on the draft EIS (please see **Appendix B** ROC #986).

On June 12, 2024, Denison met with the Lac La Ronge Lands and Resource Board for an in-person meeting in Saskatoon, for the purpose of providing Wheeler River Project updates, as requested by LLRIB, to support the resolution of LLRIB's comments made on the draft EIS. In this meeting, the LLRIB indicated that the Project was located within the boundaries specified in the Misinipiy Integrated Land Use Plan.

On June 12, 2024, following the meeting between the Lac La Ronge Lands and Resource Board and Denison, LLRIB provided Denison with a copy of the Misinipiy Integrated Land Use Plan (2012). Please see **Appendix B** ROC #1107.

On June 18, 2024, in response to the Misinipiy Integrated Land Use Plan (2012) provided to Denison by LLRIB following their recent meeting, Denison responded confirming this information was used throughout the planning of the Wheeler River Project. Denison provided a georeferenced map showing Denison's properties fall outside both the Misinipiy Planning Area, and the Lac La Ronge Indian Band Traditionally Occupied Territory, as depicted in the Misinipiy Integrated Land Use Plan (2012). Denison informed the LLRIB that, should activities fall within the area defined in the shared map, Denison would proactively reach out to the LLRIB for discussions. Please see **Appendix B** ROC #1108.

On June 18, 2024, following receipt of the georeferenced map provided by Denison, the LLRIB responded indicating that Misinipiy Integrated Land Use Plan (2012) had not been reviewed or amended since it was finalized in 2012, and that LLRIB's boundaries have been updated internally and that LLRIB considers the Wheeler River Project to be within their traditional territory, and therefore wishes to enter into an agreement with Denison. Please see **Appendix B** ROC #1109.

On June 28, 2024, Denison replied to the LLRIB, outlining the process Denison follows in relation to formal agreements. Denison reiterated their commitment to continuing efforts in responding positively to areas of interest identified by LLRIB in relation to business development/community investment. Please see **Appendix B** ROC#1113.

#### **1.7.4.3 Lac La Ronge Indian Band Key Interests, Issues and Concerns**

A summary of key interests, issues and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-6**. It is important to note that areas of identified interest, issues, or concerns are not always related to environmental effects as defined by CEAA 2012 (the regime under which the Project is undergoing regulatory assessment) - they can be reflective of general areas of interest in relation to the Project more broadly. Where appropriate, the table aims to provide clarity with respect to this distinction.

### **1.7.5 Engagement with A La Baie Métis Local #21**

The A La Baie Métis Local #21 is situated within the Community of Île-à-la-Crosse. The Community of Île-à-la-Crosse was designated as a National Historic Site in 1954 by the Federal Environment Minister on the advice of the Historic Sites and Monuments Board of Canada. Additionally, the entire community is considered a historical Métis community, and as such, contains a strong Métis identity throughout (Sakitawak Conservation n.d.a).

Île-à-la-Crosse is the birthplace of Louis Riel Sr. and is the grave-site of Sr. Marguerite Riel (the sister of Louis Riel) (Planning for Growth Northern Saskatchewan, n.d.a). In countless history books and maps, the community of Île-à-la-Crosse is duly noted for its historical significance in settling this entire area. Sakitawak is the Cree name for Île-à-la-Crosse, which means “where the rivers meet” (MN-S n.d.c). Recently, the Sakitawak Conservation Project commenced, which is mandated to protect habitats of vulnerable species, advance Indigenous ways of life, identify knowledge systems, and implement stewardship activities. The first area identified for this work is the N-14 Furblock (Sakitawak Conservation n.d.b).

**Section 2 Figure 2-1**, below, illustrates where Île-à-la-Crosse is in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, Île-à-la-Crosse is located 275 km away from the Project. In terms of travel distance by existing transportation routes Île-à-la-Crosse is located 460 km away from the Project.

### 1.7.5.1 History of Interactions

Since 2016, Denison has been engaging with A La Baie Métis Local #21 (ALBML). The type and frequency of engagement has reflected an evolving understanding of ALBML’s traditional activities and land use, including in the region of the Project. The Northern Village of Île-à-la-Crosse, and many of the community members residing in Île-à-la-Crosse, self-identify as Métis. In some instances, the elected officials of Métis Locals are also elected members of the municipality and, therefore, represent both their Indigenous community as well as their municipality. As a result, during the onset of engagement activities in 2016, there was overlap in engagement with the entities of ALBML and the Village of Île-à-la-Crosse.

In 2019, the ALBML delegated their Duty to Consult for the Project to the MN-S. Clear distinction between the Métis leadership and Citizens, and the Village leadership and residents was, therefore, necessary to make sure the MN-S was able to appropriately provide the representation of the Métis of ALBML, per the delegated Duty to Consult. As a result, Denison distinguished its engagement efforts between MN-S, on behalf of ALBML, and the general public of the Village of Île-à-la-Crosse, with no intended overlap in relation to Métis interests.

From 2019 onwards, the MN-S has been representing ALBML in respect of engagement with Denison for the Project. A comprehensive listing of engagement activities between Denison and ALBML, including a brief description of the purpose or activity and outcome where appropriate, is included in the IER.

**Appendix A-8** includes further details pertaining to all these interactions.

For details on Denison’s engagement with MN-S, see **Section 1.8.1**.

### 1.7.5.2 Agreements Relative to the Environmental Assessment Process

A MOU was signed by Denison, ALBML and the Village of Île-à-la-Crosse in 2018. The signing of this MOU with both ALBML and the Village of Île-à-la-Crosse reflected the perspective of ALBML and the Village of Île-à-la-Crosse to represent both municipal residents and the Métis Citizens co-operatively. This non-binding MOU formalized the intent to work together in a spirit of mutual respect to cooperate to collectively identify practical means by which to avoid, mitigate, or otherwise address potential effects of the Project upon the exercise of the Indigenous Rights, Treaty Rights, and interests, to the extent they are identified in relation to the Project.

In 2019, ALBML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing ALBML in respect of engagement with Denison for the Project.



### 1.7.5.3 Key Engagement Activities

During the engagement activities undertaken with ALBML, several key engagement activities took place that have played a meaningful role in relation to the environmental assessment process. These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined in **Section 1.3**, above. The main forms of engagement included meetings with leadership, a community meeting, a workshop on early infrastructure options (2018), a site visit (2019) and a meeting coordinated by the MN-S. Considerable engagement has also occurred between Denison and MN-S on behalf of ALBML and other Métis Locals, as described in **Section 1.8.1**, below.

#### **Engagement Focus: Pre-Project Description – April 2016 to May 2019**

**Introductory Meeting - December 7, 2016:** Introductory meeting: This was the inaugural meeting between the senior management team of Denison and various entities associated with ALBML and the Village of Beauval. The meeting focussed on clarifying the nature of Denison's activities, including the Project and related exploration activities, the interest in employment, business and training opportunities, reclamation requirements, agreement negotiation considerations, investment possibilities, environmental sampling and monitoring, and questions in relation to the nuclear industry in general and market related to uranium. For more specifics about this activity, please see **Appendix B**, ROC #109.

**Workshop – January 17, 2018:** Denison hosted a workshop with many community members and students. The focus of the workshop was to obtain feedback on three alternatives/options for the proposed Project: the road alignment from Highway 914 into the Project Area; the potential treated effluent discharge location; and the mining method options. The workshop opened and concluded with questions pertaining to Denison and the Project, comments on the importance of training, agreement negotiations and other general items.

General questions were asked regarding the various alternatives and options, and points of clarification pertaining to aspects of the Project. Feedback was collected on the various options and has been incorporated into the final design for road alignment, and the treated effluent discharge location. Please See **Section 2** of the EIS for more details. For more information about this activity, please see **Appendix B**, ROC #3.

#### **Engagement Focus: Post-Project Description – July 2019 to October 2022**

**Site Tour – August 23, 2019:** In August 2019, Denison hosted a site tour at the Project location. The focus of this engagement activity was to provide an in-field opportunity to understand the proposed Project and the various elements associated with the Project.

Attending the site tour was the President of ALBML. The tour involved an initial presentation regarding the Project, followed by travel around the Project site to the various locations for the proposed elements of the Project. Representatives from the CNSC and SK MOE were present.

For additional details about this activity, please see **Appendix B**, ROC #1.

**Meeting – November 5, 2019:** Denison hosted a meeting with the MN-S President, the Northern Region 3 President, legal counsel, some administrators, and several Local Presidents and representatives, including ALBML in attendance. This engagement activity was coordinated with the MN-S, in response to the delegated Duty to Consult from a number of Métis Locals as of October 2019. The focus was to provide an overview of the Project and discuss Métis interests in the Project. See **Section 1.8.1.3**, below,

for a detailed discussion on this meeting. For more information about this activity, please see **Appendix B**, ROC #62.

In 2019, ALBML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing ALBML in respect of engagement with Denison for the Project. For details on Denison's engagement with MN-S, see **Section 1.8.1**, below.

#### **Future Engagement Activities**

Denison expects to continue working with the ALBML through the MN-S, throughout the remainder of the environmental assessment and approval process and into the licensing process, to coordinate engagement activities in relation to topics of interest in relation to the Project in accordance with an agreed-upon process.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

#### **1.7.5.4 A La Baie Métis Local #21 Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators, and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 3, 2023, the MN-S submitted public comments on the draft EIS to the CNSC (Government of Canada 2024). As ALBML delegated their duty to consult to the MN-S, engagement on issues related to the environmental assessment are now represented by the MN-S. On December 1, 2023, following work undertaken with the MN-S since receipt of the March 3, 2023, public comments, Denison provided responses to the MN-S' public comments made on the draft EIS (please see **Appendix B** ROC #973).

On December 1, 2023, following work undertaken with the MN-S since receipt of the March 3, 2023, public comments, Denison provided responses to the MN-S' public comments made on the draft EIS (please see **Appendix B** ROC #973).

During this same time period, Denison and the MN-S met regularly to discuss the advancement of the Métis Knowledge Study and to discuss items in relation to the development of a MN-S defined process for engagement on the Project, including in relation to the resolution of the MN-S public comments and general issues and concerns. One of the key areas of concern raised by the MN-S was the inclusion of information obtained as a result of the completion of the Métis Knowledge Study into the EIS. The Métis Knowledge Study was received by Denison on October 24, 2023 and Denison has integrated relevant information from the Study into the EIS accordingly.

On March 31, 2025, the MN-S notified the CNSC that they had outstanding issues in relation to the Project and the associated process. Generally, the issues raised were: (i) concerns regarding stigma, contamination and residual impacts, (ii) basement rock permeability, (iii) losses to Métis title, the value of the uranium resource, and the socio-economic value through the extraction of that resource, (iv) effects

on harvesting/fish through impacts to Whitefish and Russel Lake, (v) monitoring of ongoing impacts, and (vi) the consent process ((please see **Appendix B** ROC #1244). Denison and the MN-S met in late April to discuss these outstanding issues.

On June 3, 2025, as a follow up to their previous meeting, Denison provided to the MN-S an outline of their commitments in respect to these outstanding issues (please see **Appendix B** ROC #1223). On July 31, 2025, the MN-S responded indicating these issues remained unresolved. The MN-S shared that they felt Denison's and the Crown's engagement to be insufficient, and requested additional information on basement rock permeability, for Denison to confirm their commitment to collaborative monitoring, and for Denison to confirm the details of the socioeconomic assessment considerations (please see **Appendix B** ROC #1245).

All efforts and outcomes in relation to future efforts will be documented in future iterations of the IER. For more information about the work undertaken with the MN-S, please see **Section 1.8.1**.

### **1.7.5.5 A La Baie Métis Local #21 Key Interests, Issues and Concerns**

A summary of key interests, issues and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-7**. It is important to note that areas of identified interest, issues or concerns are not always related to environmental effects as defined by CEAA 2012 (the regime under which the Project is undergoing regulatory assessment) - they can be reflective of general areas of interest in relation to the Project more broadly. Where appropriate, the table aims to provide clarity with respect to this distinction. As ALBML delegated their duty to consult to the MN-S in late 2019, the table is representative to the timeframe prior to the delegation of the duty to consult by the ALBML to the MN-S.

### **1.7.6 Engagement with Dore/Sled Lake Métis Local #67**

In November 2019, when Denison was advised by the MN-S that a number of Métis Locals had delegated to MN-S the Duty to Consult for the Project, Dore/Sled Lake Métis Local #67 was one of the Locals. As such, the MN-S has held the Duty to Consult for Dore/Sled Lake Métis Local #67 since that time and Denison has been engaging through the MN-S for the Project.

**Section 2 Figure 2-1** below, illustrates where the communities are in relation to the Project, both in terms of direct linear distance and travel distance. In terms of direct linear distance, Sled Lake is located 363km away from the Project. In terms of travel distance by existing transportation routes, Sled Lake is located 537km away from the Project. In terms of direct linear distance, Dore Lake is located 344km away from the Project. In terms of travel by existing transportation routes, Dore Lake is located 590km away from the Project.

#### **1.7.6.1 Key Engagement Activities**

##### **Engagement Focus: Post-Project Description – July 2019 to October 2022**

**Meeting – November 5, 2019:** Denison hosted a meeting with the MN-S President, the Northern Region 3 President, legal counsel, some administrators, and several Local Presidents and representatives. This engagement activity was coordinated with the MN-S, in response to the delegated Duty to Consult from several Métis Locals as of November 2019. The focus was to provide an overview of the Project and discuss Métis interests in the Project.

The President of Dore/Sled Lake Métis Local #67 was in attendance. For more specifics about this activity, please see **Appendix B**, ROC #62.

In 2019, Dore/Sled Lake Métis Local #67 delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing Dore/Sled Lake Métis Local in respect of engagement with Denison for the Project. For details on Denison's engagement with MN-S, see **Section 1.8.1**, below.

### **Future Engagement Activities**

Denison expects to continue working with the Dore/Sled Lake Métis Local through the MN-S, throughout the remainder of the environmental assessment and approval process and into the licensing process, to coordinate engagement activities in relation to topics of interest in relation to the Project in accordance with an agreed-upon process.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

### **1.7.6.2 Dore/Sled Lake Métis Local Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators, and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 3, 2023, the MN-S submitted public comments on the draft EIS to the CNSC (Government of Canada 2024). As Dore/Sled Lake Métis Local #67 delegated their duty to consult to the MN-S, engagement on issues related to the environmental assessment are now represented by the MN-S.

On December 1, 2023, following work undertaken with the MN-S since receipt of the March 3, 2023, public comments, Denison provided responses to the MN-S' public comments made on the draft EIS (please see **Appendix B** ROC #973).

During this same time period, Denison and the MN-S met regularly to discuss the advancement of the Métis Knowledge Study and to discuss items in relation to the development of a MN-S defined process for engagement on the Project, including in relation to the resolution of the MN-S public comments and general issues and concerns. One of the key areas of concern raised by the MN-S was the inclusion of information obtained as a result of the completion of the Métis Knowledge Study into the EIS. The Métis Knowledge Study was received by Denison on October 24, 2023 and Denison has integrated relevant information from the Study into the EIS accordingly.

Denison and the MN-S have agreed to amendments to the existing Capacity Funding Agreement in support of a Joint Working Group, which is a mutually agreeable engagement process. The first meeting of this Joint Working Group took place in April, 2025.

Following further discussions between Denison and the MN-S during August, 2024 MN-S outlined an additional consent-based process that MN-S desired take place between Denison and the MN-S, to occur

in parallel to the earlier discussed mutually agreeable engagement process. This process began in January 2025 and is ongoing with the MN-S.

For more information about the work undertaken with the MN-S, please see Section **1.8.1**.

### **1.7.7 Engagement with Peter Ballantyne Cree Nation**

The Peter Ballantyne Cree Nation (PBCN) is a Woodland Cree First Nation in northern Saskatchewan consisting of eight communities: Denare Beach, Deschambault Lake, Kinoosao, Pelican Narrows, Prince Albert, Sandy Bay, Southend and Sturgeon Landing. The Peter Ballantyne Cree Nation are called Assin'skowitiniwak or Rocky Cree. Assin'skowitiniwak means "people of the rocky area".

PBCN is a signatory to Treaty 6. Figure 4.3 2 illustrates where the communities are in relation to the Project, both in terms of direct linear distance and travel distance. PBCN is comprised of eight communities, including Amisk Lake (Denare Beach), Deschaumbault Lake, Kinoosao, Pelican Narrows, Prince Albert, Sandy Bay, Southend, and Sturgeon Landing (PBCN 2024). In terms of direct linear distance and travel distance by existing transportation routes, the following information is provided: Amisk Lake/Denare Beach (direct linear distance = 375 km; travel distance by existing transportation routes = 750 km), Deschambault Lake (direct linear distance = 310 km; travel distance by existing transportation routes = 650 km), Kinoosao (direct linear distance = 200 km; travel distance by existing transportation routes = 1,520 km), Pelican Narrows (direct linear distance = 296 km; travel distance by existing transportation routes = 715 km), Prince Albert (direct linear distance = 485 km; travel distance by existing transportation routes = 615 km), Sandy Bay (direct linear distance = 287 km; travel distance by existing transportation routes = 785 km), Southend (direct linear distance = 180 km; travel distance by existing transportation routes = 700 km), Sturgeon Landing (direct linear distance = 425 km; travel distance by existing transportation routes = 850 km).

#### **1.7.7.1 History of Interactions**

With respect to the Project, Denison was contacted by PBCN on March 6, 2023, notifying Denison of their interest in the Project. In this initial contact, PBCN provided Denison a draft traditional territory map dated February 8, 2023, which differed from that information published on their website, and showed a portion of the property associated with the Project within the PBCN traditional territory.

As a result of this initial contact, Denison and PBCN planned for an initial introductory meeting about the Project. This introductory meeting occurred on May 15, 2023. During this meeting, PBCN expressed its interest to Denison about entering into agreement with them in support of engagement activities on the Project. PBCN also identified its perspective that the Project may adversely affect PBCN's Aboriginal and / or Treaty rights. As a result, Denison requested PBCN provide Denison with information about activities in and around the Project area (**Appendix B** ROC #907).

Denison and PBCN planned for an additional meeting whereby Denison would provide an overview of the Project and responses to PBCN's public comments on the draft EIS and related concerns, and PBCN would provide information regarding PBCN activities in and around the Project area. Denison and PBCN agreed on Denison providing capacity funding in support of this engagement activity. This meeting was held on September 20, 2023. During this meeting, Denison provided an overview of the Project and responded to questions of clarifications related to the Project activities. PBCN also provided an overview of the PBCN history and relationship to Reindeer Lake, from Hatchet Lake to Pelican Narrows. As well, PBCN noted that Denison is in the traditional territory of PBCN. During this meeting, Denison requested

information about specific PBCN land uses in and around the Project in order to better understand the potential for adverse impacts to PBCN rights. In response to this, PBCN noted that the Director of Lands and Resources, who was prepared to speak to this information, was unable to attend due to illness.

PBCN also provided an overview of their Land and Resources Committee (LRC) and the process designed by the LRC to engage with industry and participate in the regulatory process, which has been delegated to them by the Chief and Council of PBCN. It was noted that part of this process is to ensure that projects and potential impacts are understood, and PBCN is engaged throughout the process, which also includes undertaking commercial conversations with PBCN in relation to understanding impacts and sharing of benefits. In response to this, Denison restated its perspective that in order to consider such arrangements it would need to have clearer information about the potential for the Project to adversely impact PBCN rights.

Due to time constraints, Denison was unable to complete the presentation developed in response to PBCN public comments on the EIS. In the correspondence follow-up to the meeting provided on October 10, 2023, Denison provided PBCN with the presentation related to the Project overview, the presentation prepared in response to the PBCN public comments on the draft EIS, a set of meeting notes referencing key points made by both parties, and some follow-up information in relation to PBCN concerns about the potential for adverse impacts to water quality and the relationship to PBCN communities, along with transparency regarding monitoring for the Project. For more details, please see **Appendix B** ROC #977.

On October 20, 2023, PBCN sent a letter to Denison following up on the September 20, 2023, meeting and to Denison's October 10, 2023, correspondence. In this letter, PBCN articulated how PBCN members shared the important link between community wellness and the natural environment, and the importance of PBCN Members to exercise their treaty and Aboriginal rights. PBCN restated that the Project is within the PBCN traditional territory and will have potential environmental and socio-economic impacts, and thus have related impacts to PBCN's Aboriginal and treaty rights. This letter noted that PBCN was in contact with the federal and provincial regulators to explain PBCN's treaty and Aboriginal rights. PBCN also reiterated its perspective that PBCN lacked the capacity needed to support PBCN's engagement with respect to the Project.

On November 22, 2023, Denison responded to PBCN's letter of October 20, 2023. Denison reiterated its interest to continued engagement with PBCN on the Project, and restated its request to receive information pertaining to PBCN's specific interests and land use activities in the Project area that would be adversely impacted by the Project. Denison also provided an overview of its history with the Wheeler River property since 2004, outlining the information used to date to identify those Indigenous communities who may be impacted by the Project, such as the wildlife and fur block management administrative areas, existing traditional land use information made available through Key Lake and McArthur River public review processes, anticipated transportation routes, and anticipated impacts to water and publicly available information about Indigenous Nations' traditional territories.

On December 12, 2023, PBCN responded to Denison's letter of November 22, 2023. PBCN requested that discussions commence regarding capacity funding from Denison to support PBCN's engagement with Denison on the Project and to complete a PBCN-specific traditional land and resources use study and report for the Project. PBCN highlighted that, during the September 20, 2023, meeting between PBCN and Denison, members of the Lands and Resources Committee shared information with Denison about uses in and around the Project area, demonstrating PBCN's concerns regarding the potential impacts of the Project on PBCN's Aboriginal and treaty rights and interests.



On January 10, 2024, Denison responded to PBCN's correspondence from December 12, 2023. In that correspondence Denison provided a history of engagement activities that had occurred between PBCN since interest was expressed by PBCN in the Project, along with a response from Denison with respect to the PBCN concerns regarding potential water contamination to Reindeer Lake, the main waterbody in proximity to Southend, SK. Denison also responded to PBCN's concerns regarding cumulative effects and provided some information in relation to the methodology undertaken by Denison in respect of cumulative effects related to water. Denison also stated that in order for it to undertake deeper engagement than has occurred to date with PBCN, Denison would appreciate receiving information about how the Project will adversely impact PBCN land uses and rights, and without such information, was unable to determine that a traditional land and resources use study and report for the Project was warranted.

On November 1, 2024, Denison mailed PBCN a letter of notice to share the status of the Environmental Impacts Statement per the provincial regulatory process.

On April 17, 2025, Denison sent a letter to PBCN with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.

**Appendix A-11** includes further details pertaining to all these interactions.

#### **Future Engagement Activities:**

Denison has indicated its willingness to engage with PBCN about the Project and will continue to do, provided mutually agreeable circumstances for such engagement can occur.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

### **1.7.7.2 Peter Ballantyne Cree Nation Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by the federal regulators, and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 3, 2023, PBCN submitted public comments on the draft EIS to the CNSC (Government of Canada 2024).

As noted earlier in the section, Denison and PBCN met on May 15, 2023, to hold an introductory meeting between the parties. On September 20, 2023, another meeting was held in which it was planned that Denison would respond to the March 3, 2023, PBCN public comments on the draft EIS. Due to time constraints, this did not occur. As a follow up to the meeting, Denison provided those responses to PBCN in written form.

In a letter to Denison sent on April 8, 2025, PBCN shared information with Denison pertinent to their interests around the Wheeler River Project area. PBCN expanded on their initial public comments on the EIS and indicated a desire to continue engagement with Denison. On May 20, 2025, Denison received further information from PBCN regarding their interests in the Project. In July and August, 2025, Denison and PBCN collaborated to develop a process and deliverable that would address PBCN's broad issues and concerns in relation to protection of water quality in their traditional territory, access to monitoring data, and participation in environmental monitoring initiatives, which were the key areas of interest identified by PBCN in respect of the Project.

Denison is committed to continuing engagement with PBCN about the Project. .

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

### **1.7.7.3 Peter Ballantyne Cree Nation Key Interests, Issues and Concerns**

A summary of key interests, issues and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-8**. It is important to note that areas of identified interest, issues or concerns are not always related to environmental effects as defined by CEAA 2012 (the regime under which the Project is undergoing regulatory assessment) - they can be reflective of general areas of interest in relation to the Project more broadly. Where appropriate, the table aims to provide clarity with respect to this distinction.

## **1.8 Engagement with Indigenous Organizations**

### **1.8.1 Engagement with Métis Nation – Saskatchewan**

As the elected government of the Métis people of Saskatchewan, the MN-S plays an important role related to engagement activities. The MN-S is currently structured with a President, an Executive, a Provincial Métis Council, Regional Directors, and Local Presidents. The MN-S website states that *'consultations must be with the Métis government structures that are elected and supported by the Métis people'* (MN-S n.d.b). The Project is located within Métis Region 1; however, there are Métis Locals in the general area of interest from Northern Region 3. **Section 2 Figure 2-1**, below, illustrates where these Métis Locals and Regions are in relation to the Project.

In October 2019, Denison was advised by the MN-S that Kineepik Métis Local 9 (Pinehouse), A La Baie Métis Local 21, Sipishik Métis Local 37 (Île-à-la-Crosse), Métis Local 67 (Dore Lake and Sled Lake), and Patuanak Métis Local 82 (Patuanak) had delegated to MN-S the Duty to Consult for the Project, and also advised that MN-S would provide direction regarding engagement activities with Northern Region 1, Northern Region 3 and any other entities of the MN-S. Since then, Denison has been following the request of the MN-S in this regard. In November 2021, Denison was informed that KML had revoked its delegation of the Duty to Consult to the MN-S that it had previously provided in October 2019. As of June 2022, the MN-S have been formally delegated the Duty to Consult for the Project by Sipishik Métis Local 37 (Beauval), A La Baie Métis Local 21 (Île-à-la-Crosse), Patuanak Métis Local 82 (Patuanak) and Local 67 (Dore Lake and Sled Lake).

#### **1.8.1.1 History of Interactions**

Since Denison's initial connection with the MN-S about the Project in June 2019, the main focus of the activities between the parties has been on the development of appropriate processes, deliverables, and

budgets desired by MN-S to support its meaningful participation in the environmental assessment process, including the representation of those Métis Locals who have delegated the Duty to Consult to MN-S.

Throughout the engagement, Denison has repeatedly and consistently affirmed its interest in MN-S participation and the incorporation of Métis knowledge into the EIS, in addition to the information and input that has already been gathered with KML.

**Appendix A-9** includes further details pertaining to all these interactions.

### **1.8.1.2 Agreements Relative to the Environmental Assessment Process**

Since being advised by the MN-S in October 2019 that a number of Métis Locals had delegated to the MN-S the Duty to Consult for the Project, Denison has been engaged in extensive ongoing discussions with the MN-S with the goal of reaching agreement regarding the EA process and MN-S' participation in it.

In recognition of the MN-S' potential interests in the Project, the parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings.

A capacity funding agreement was signed relative to the above process with the MN-S in October 2022. As part of this agreement, Denison agreed to fully fund a Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023, and has integrated relevant information from the Study into the EIS. For more information about the Métis Knowledge Study, please see Section 3 of the EIS.

On February 17, 2023, based on a request by the MN-S, Denison and the MN-S entered into an amendment to the Capacity Funding Agreement to provide additional funding to further support the MN-S technical review on the draft EIS.

Denison and the MN-S have agreed to amendments to the existing Capacity Funding Agreement in support of a Joint Working Group, which is a mutually agreeable engagement process. The first meeting of this Joint Working Group took place in April, 2025.

Following further discussions between Denison and the MN-S during August, 2024 MN-S outlined an additional consent-based process that MN-S desired take place between Denison and the MN-S, to occur in parallel to the earlier discussed mutually agreeable engagement process. This process began in January 2025 and is ongoing with the MN-S.

### **1.8.1.3 Key Engagement Activities**

During the engagement activities undertaken with MN-S, two engagement activities of note took place. These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined in **Section 1.3**, above. The following describes the activities in more detail.

#### **Engagement Focus: Post-Project Description – July 2019 to October 2022**

**Site Tour – August 23, 2019:** In August 2019, Denison hosted a site tour at the Project location. The focus of this engagement activity was to provide an in-field opportunity to understand the proposed Project and the various elements associated with the Project.

Attending the site tour was the President of the MN-S, the President of MN-S Region 3 and a number of Métis Local Presidents and/or representatives, including the President and Executive Director of the KML, the VP of the SML, the President of PML, and the President of the ALBML. The tour involved an initial presentation regarding the Project, followed by travel around the Project site to the various locations for the proposed elements of the Project. Representatives from the CNSC and SK MOE were present.

Specific questions were raised by the MN-S representatives in relation to:

- confirmation that Denison was following the engagement protocols and direction set out by the MN-S in relation to the Regions and the Locals;
- queries regarding general Project particulars, such as waste management, wastewater, radiation monitoring and management, and the composition of the mining solution to be used, and the nature of this solution in relation to the grade of the ore; and
- confirmation that Denison will be using local contractors for the Project.
- For more specifics about this activity, please see **Appendix B**, ROC #1.

**Meeting – November 5, 2019:** In response to the delegated Duty to Consult from a number of Métis Locals provided in November 2019, Denison hosted a meeting with the MN-S President, the Northern Region 3 President, legal counsel, some administrators, and several Local Presidents and representatives, including from the KML, the SML, the ALBML, and the PML. The focus was to provide an overview of the Project and discuss Métis interests in the Project.

The MN-S noted that they are focused on supporting the Locals, and finding capacity within the organization to support efforts going forward with Denison.

The MN-S noted that they provided direction to legal counsel to seek an exploration agreement with Denison.

Questions were asked regarding location of Denison sites and focused interests, what would occur should the Project change ownership with a potential Impact Benefit Agreement and the relationship developed between Denison and MN-S, costs assessment of the Project, the relationship of share price and community investment expenditures, and the challenges related to securing business opportunities at sites for smaller communities.

Technical questions were asked regarding the ISR mining method: employment related to the ISR operation; the potential for other deposits in the Athabasca Basin to be mined using ISR; clarification that ISR is not the same as fracking, as fracking uses very high pressures to break the rock apart; the consequence of various types of accidents that could occur, such as a pumping or injection well breaking, the volume of acid required and requirement for transportation of the acid; and the transportation requirements for yellowcake.

Logistical questions were asked regarding the potential future mining of the Gryphon deposit, which is not part of the Project assessed herein. These questions were focused on the location for milling of Gryphon ore and whether the road connection between McArthur River and Cigar Lake would be part of the Gryphon project, if it were to proceed in the future.

Questions related to the environment and protection of people were asked, such as those focused on water sampling conducted to date, methodology of dealing with treated effluent, environmental monitoring in general, the interest of the Métis regarding transparent environmental monitoring data and access to such data, and understanding the potential for radiation doses from the operation.

The MN-S identified their interest in understanding the IK collected for the Project (from KML), if Denison was conducting additional work in this area, and if Denison would consider doing so. Denison indicated that IK, including land use data, is an integral part of the EIS development, and expects to receive direction from the MN-S on this topic as the process moves forward.

Discussion occurred regarding the concern about racism occurring at sites, include the Project exploration site, and how to make sure all people are treated with respect at the working sites, now and in the future. It was mutually expressed that the MN-S and Denison have a shared interest towards making sure values of respect are embedded into the Project development.

The MN-S identified that the land in which the Project is located is subject to a land claim, the resources within the land claim area are claimed by the Métis, and removal of the resources claimed by the Métis must result in a portion of the revenue going back to the Métis. The MN-S has a desire to create a legacy and generate wealth for its people.

For more information about this activity, please see **Appendix B**, ROC #62.

### **Engagement Focus: Environmental Assessment Outcomes and Relationship to Licensing / Approvals – October 2022 to Present**

**Meetings – February 11 and February 12, 2023:** In February 2023 the MN-S coordinated meetings with the leadership of NR1 and NR3 separately, in order to support the MN-S' efforts towards processing the Métis Knowledge Study and contributions toward the MN-S' public comments on the draft EIS.

Subsequently, on February 11, 2023, Denison met with MN-S and NR1 leadership along with Two Worlds Consulting, the CNSC, and the Government of Saskatchewan. On February 12, 2023, Denison met with MN-S and NR3 leadership along with Two Worlds Consulting, the CNSC, and the Government of Saskatchewan. In both meetings, Denison presented an overview of the Project, the environmental assessment process, the valued components, and the environmental assessment outcomes. Generally, during both meetings, numerous questions were asked about the Project and the technical elements of the Project. There was also discussion about the importance of transparency with respect to environmental monitoring outcomes and ensuring that opportunities are available for Métis people beyond entry level positions. It is Denison's understanding that the MN-S utilized the engagement discussions to inform their contributions toward the MN-S' public comments on the draft EIS. For more information about this activity, please see **Appendix B** ROC #824 and ROC #835.

**Meeting – April 30, 2025:** Denison met with Métis Nation - Saskatchewan as part of the Joint Working Group to discuss outstanding concerns Issues in relation to for the Wheeler River Project.

### **Future Engagement Activities**

Denison expects to continue working with the MN-S, throughout the remainder of the environmental assessment and approval process and into the licensing process, to coordinate engagement activities related to their topics of interest related to the Project in accordance with an agreed-upon process.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

## **1.8.1.4 Métis Nation – Saskatchewan Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators, and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS,

Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 3, 2023, the MN-S submitted public comments on the draft EIS to the CNSC (Government of Canada 2024), which comprised 125 technical comments.

On December 1, 2023, following work undertaken with the MN-S since receipt of the March 3, 2023, public comments, Denison provided responses to the MN-S' public comments made on the draft EIS (please see **Appendix B** ROC #973).

During this same time period, Denison and the MN-S met regularly to discuss the advancement of the Métis Knowledge Study and to discuss items in relation to the development of a MN-S defined process for engagement on the Project, including in relation to the resolution of the MN-S public comments and general issues and concerns. One of the key areas of concern raised by the MN-S was the inclusion of information obtained as a result of the completion of the Métis Knowledge Study into the EIS. The Métis Knowledge Study was received by Denison on October 24, 2023 and Denison has integrated relevant information from the Study into the EIS accordingly.

On March 31, 2025, the MN-S notified the CNSC that they had outstanding issues in relation to the Project and the associated process. Generally, the issues raised were: (i) concerns regarding stigma, contamination and residual impacts, (ii) basement rock permeability, (iii) losses to Métis title, the value of the uranium resource, and the socio-economic value through the extraction of that resource, (iv) effects on harvesting/fish through impacts to Whitefish and Russel Lake, (v) monitoring of ongoing impacts, and (vi) the consent process (please see **Appendix B** ROC #1244). Denison and the MN-S met in late April to discuss these outstanding issues.

On June 3, 2025, as a follow up to their previous meeting, Denison provided to the MN-S an outline of their commitments in respect to these outstanding issues. On July 31, 2025, the MN-S responded indicating these issues remained unresolved. The MN-S shared that they felt Denison's and the Crown's engagement to be insufficient, and requested additional information on basement rock permeability, for Denison to confirm their commitment to collaborative monitoring, and for Denison to confirm the details of the socioeconomic assessment considerations (please see **Appendix B** ROC #1245).

All efforts and outcomes in relation to future efforts will be documented in future iterations of the IER.

#### **1.8.1.5 Métis Nation – Saskatchewan Key Interests, Issues and Concerns**

A summary of key interests, issues and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-9**. It is important to note that areas of identified interest, issues or concerns are not always related to environmental effects as defined by CEAA (they can be reflective of general areas of interest in relation to the Project more broadly). Where appropriate, the table aims to provide clarity with respect to this distinction.



## 1.8.2 Engagement with Ya'thi Néné Lands and Resources Office

The YNLR was created as a not-for-profit organization to be the single point of contact between industry, government, and the local Athabasca communities of Hatchet Lake First Nation, Black Lake First Nation, Fond du Lac First Nation, Camsell Portage, Stony Rapids, Uranium City, and Wollaston Post. As outlined on their website, their mission is to protect the lands and waters of the Athabasca Basin for the long-term benefit of its Denesų́líné First Nations and Athabasca communities, guided by their knowledge, traditions, and ambitions, while being a respected partner in relations with industries, governments, and organizations who seek to develop the Athabasca Basin's resources (YNLR n.d.).

In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified above were interested in the Project and that YNLR held the Duty to Consult from these communities. Prior to this, Denison followed the previously accepted approach by the CNSC and Province of Saskatchewan to engage with the Athabasca Basin communities (Indigenous and non-Indigenous communities) in relation to activities occurring in the northern part of the Athabasca Basin region (from Cigar Lake and north). The YNLR was also identified by the CNSC as having interests in the Project.

The Project is located within the Nuhenéné (the Athabasca Denesų́líné territory) and, as such, Denison has engaged with YNLR to better understand the traditional land use activities that are currently being undertaken in the Project Area by the member Indigenous communities of YNLR.

As stated above, YNLR directed Denison to undertake engagement and communication solely with YNLR for the purposes of any activities requiring approval actions, such as an EA for the Project. As such, engagement activities undertaken with YNLR are, therefore, considered representative of the Indigenous communities of Hatchet Lake First Nation, Black Lake First Nation and Fond du Lac First Nation (unless otherwise specified), and the municipal non-Indigenous communities of Uranium City, Stony Rapids, Camsell Portage and Wollaston Lake.

### 1.8.2.1 History of Interactions

Since Denison's initial connection with the YNLR about the Project in March 2019, Denison has been engaging with YNLR in a variety of ways. **Appendix A-10** includes further details pertaining to all these interactions.

### 1.8.2.2 Agreements Relative to the Environmental Assessment Process

The Project is located within the Nuhenéné (the Athabasca Denesų́líné territory). As such, Denison entered into two letter agreements with YNLR in 2021 to support the YNLR's participation in the EA process for the Project:

- 1) A Letter Agreement outlining arrangements for Denison and YNLR to mutually plan and coordinate appropriate engagement activities in relation to the Project, with Denison fully funding the activities.
- 2) A Letter Agreement outlining a mutually agreeable process by which the YNLR would author a report for Denison to consider and include, as appropriate, into the EIS. This included a process by which the YNLR would also pre-review the pertinent sections of the EIS in relation to their authored report to comment in respect of Denison's inclusion of the YNLR-authored materials.

As a result, several additional activities have been undertaken between Denison and YNLR, including YNLR's pre-review of pertinent sections of the EIS, which are further described in **Section 1.8.2.3**, below.

### 1.8.2.3 Key Engagement Activities

During the engagement activities undertaken with YNLR, the main forms of engagement included meetings with YNLR leadership (including representation of various Chiefs, Councillors and municipal leaders), an online survey (2021), a virtual meeting targeted toward all of the YNLR communities, and an in-person series of community meetings. These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined in **Section 1.3**, above.

The following describes the key engagement activities in more detail.

#### **Engagement Focus: Post-Project Description: July 2019 to October 2022**

**Meeting – October 3, 2019:** This meeting was the inaugural meeting between members of the senior management team of Denison and the leadership of the YNLR, including the administration of YNLR, three Chiefs each from Black Lake, Fond du Lac and Hatchet Lake, two Councillors each from Hatchet Lake and Black Lake, Board Directors of the YNLR and advisors and support team to the YNLR. Attendees asked questions on the following topics to Denison:

- 1) the nature of the mining solution and containment methods for the mining solution, including contingency measures if excursions occur outside of freeze dome;
- 2) details regarding the freeze concept;
- 3) details regarding groundwater in the area and number and location of the monitoring wells;
- 4) details on the type of ore body (grade, impurities, percentage recovered);
- 5) lifespan of the Project and opportunities for employment, training and business;
- 6) quality of treated effluent;
- 7) use of ISR methodology and relationship to other deposits in the area, such as Midwest; and
- 8) specific comments pertaining to Treaty and/or Indigenous Rights in or around the Project.

For additional details about this activity, please see **Appendix B**, ROC #78.

**Meetings (Leadership and Virtual) – September 29, 2021:** On September 29, 2021, Denison hosted virtual meetings with YNLR including with leadership and staff members of the YNLR, two Chiefs each from Fond du Lac and Hatchet Lake, two Councillors each from Black Lake and Hatchet Lake and four municipal leaders each from Uranium City, Camsell Portage, Stony Rapids and Wollaston Lake, as well as hosted a virtual meeting for community members from all the YNLR-represented communities. These meetings were planned in collaboration with the YNLR. The focus of these engagement activities was to provide information about the Project to the YNLR leadership and community members, present a preliminary list of VCs that Denison had identified as part of the EA process, provide an opportunity for members to give feedback on the proposed list of VCs, and ask questions about Project components of interest or concern to them.

The topics covered during the presentations at the meeting included the following:

- Denison company introduction and key staff members;
- introduction to regulators;
- location of the Project;
- ISR mining, in general;

- ISR mining at the Project, including the recent change in the Project design from freeze dome technology to a freeze wall containment method;
- past work undertaken by Denison on options analysis;
- employment opportunities;
- environmental assessment; and
- Valued Components.

**Leadership Meeting – September 29, 2021:** Denison hosted the leadership meeting over Zoom. There were 20 leadership participants, including with leadership and staff members of the YNLR, two Chiefs each from Fond du Lac and Hatchet Lake, two Councillors each from Black Lake and Hatchet Lake and four municipal leaders each from Uranium City, Camsell Portage, Stony Rapids and Wollaston Lake:

Questions and comments focussed on:

- the importance of engagement with the Athabasca Denesųliné;
- opportunities from the Project;
- access through the Key Lake Gate;
- general agreement comments (in relation to other Collaboration Agreements, exploration agreements);
- technical questions pertaining to the mining method including the amount of water to be used, treatment;
- use of the method in other locations;
- managing the potential effects to the land; and
- training opportunities.

For more information about this activity, please see **Appendix B**, ROC #570.

**Virtual Meeting – September 29, 2021:** Denison hosted the virtual community presentation over Zoom. The virtual meeting was advertised on the radio and social media, and posters were placed in community buildings. Denison delivered a presentation over Zoom. Athabasca Basin community members were invited to ask questions during the presentation, share their thoughts through a survey questionnaire, or email Denison directly with feedback. At least nine Zoom accounts were used to attend the presentation; however, more than one person may have viewed the presentation from each account. Throughout the meeting, Denison encouraged attendees to share their questions in the Zoom chat feature. Attendees did not post any questions in the chat during the meeting. The Provincial regulator was in attendance. For additional details about this activity, please see **Appendix B**, ROC #571.

**Online Survey:** During and following the YNLR meeting(s), members were invited to provide feedback on VCs through an online survey. The purpose of the survey was to seek feedback on the importance of the VCs to members, and identify interests or concerns related to the Project, providing an additional means by which feedback could be provided to Denison. Those who were unable to attend the presentation were also encouraged to provide feedback through the survey. The survey was marketed using Facebook and radio advertisements.

The survey was open for feedback from September 29 until October 10, 2021. No responses from Athabasca Basin residents were received during this time.

**Engagement Focus: Environmental Assessment Outcomes and Relationship to Licensing / Approvals – October 2022 to Present**

**Meetings – January 23 to January 25, 2023:** In January 2023 a series of community meetings were jointly coordinated with the YNLR and Denison, during which information was shared about the Project. In addition to providing an overview on exploration activities and the recently signed Exploration Agreement, Denison also provided an update to community members pertaining to the Wheeler River Project. Live translations were carried out throughout the presentation. The presentation pertained to Project components, Project technologies, Project schedule, the regulatory process, and the environmental impact assessment process and outcomes. Booklets were available for community members to take home that included, but were not limited to, detail on Project components, Project technologies, regulatory process, Project schedule and the EIS including valued components, significance findings, monitoring, and mitigation. A one-page summary on the WRP was available for community members to take home in English, Cree, and Dene. The in-person meetings were as follows:

January 23, 2023 (evening): Black Lake First Nation (Please see **Appendix B** ROC #823)

January 24, 2023 (daytime): Uranium City (Please see **Appendix B** ROC #842)

January 24, 2023 (evening): Fond du Lac First Nation (Please see **Appendix B** ROC #845)

January 25, 2023 (evening): Hatchet Lake First Nation (Please see **Appendix B** ROC #846)

**Site Tour – November 2, 2023:** In accordance with a previous commitment to the YNLR, Denison worked with the YNLR to coordinate a site visit to the Project in 2023. On September 15, 2023, Denison and the YNLR representatives attempted to fly to the Project site to undertake the site visit, but due to poor visibility, were unable to complete this activity. Subsequently, on November 2, 2023, Denison and the YNLR successfully visited the Project site. An overview of the work done to date on the Project was provided, including the 2022 and 2023 Feasibility Field Test in support of the Project.

**Meeting - February 22, 2024:** In support of resolution of issues raised by the YNLR on the draft EIS for the Project, Denison and the YNLR held an in-person technical meeting focused on cumulative effects, with both Denison's and YNLR's technical experts in attendance. Both YNLR and Denison provided presentations centered around cumulative effects, and YNLR provided an overview on environmental monitoring and management with reference to Denison's responses to YNLR comments on the environmental impact statement for the Wheeler River Project.

**Athabasca Basin Community Meetings – June 10 to June 13, 2024:**

In June 2024, Denison and the YNLR collaboratively facilitated a series of in person meetings for Athabasca communities. In addition to Denison's and the YNLR's participation in these meetings, members of the Saskatchewan Ministry of Environment were also in attendance. The CNSC was also invited but, due to a conflict with other commitments, was unable to attend.

In advance of these meetings, Denison and the YNLR met virtually for discussion at regular intervals for the purpose of discussing logistics and planning. Through this process, engagement materials were developed by Denison that incorporated YNLR feedback.

At the recommendation of the YNLR, engagement focussed largely on introducing the in-situ recovery mining method at a conceptual level. Specifics pertaining to the Wheeler River Project were then shared with community members and included Project stage, Project components, and mitigation and monitoring, and future employment and business opportunities. This information was shared through PowerPoint presentation and accompanying hardcopy booklets. Live translations were carried out

throughout the presentations and associated dialogue, and a one-page summary of the Wheeler River Project was available, in hard copy, in English, Cree, and Dene. Presentations were additionally conducted by the YNLR and the Saskatchewan Ministry of Environment.

The in-person meetings and associated themes central to discussion are as follows:

***Stony Rapids Community Meeting – July 10, 2024 (afternoon):*** Throughout the Stony Rapids Community Meeting, the most prominent and recurrent theme expressed by attendees related to socio-economic wellbeing and was often expressed in terms of economic benefits such as employment, training, and business opportunities. The importance of providing youth with opportunities for training and employment relative to the mining industry was expressed. Attendees emphasized the importance of developing relationships to further socio-economic benefits. In addition to highlighting employment, training, and business opportunities, attendees expressed the need for improved infrastructure, emphasizing the poor quality of the road connecting Stony Rapids to Points North.

During this community meeting, questions were asked specific to Project technology and Project components. Some attendees expressed support of the small Project footprint and the low impact mining method, while others emphasized hesitancy based on expressed perspectives related to the sharing of benefits. Attendees additionally stressed the importance of ongoing communication and information sharing. It was indicated by one attendee that trapping is impacting by the onset of surrounding exploration activities. Please see **Appendix B**, ROC #1102 for more information on this meeting.

***Black Lake First Nation Community Meeting – June 10, 2024 (evening):*** During the Black Lake Community Meeting, attendees asked Project specific questions following the presentation provided by Denison such as the life of the Wheeler River Mine, the depth of the Phoenix ore body, and clarifications surrounding the leaching process as part of the in-situ recovery mining method. Dialogue that followed these questions centred around employment and training opportunities, with attendees placing emphasis enabling community members to obtain and retain meaningful employment. The importance of training opportunities was highlighted. Please see **Appendix B** ROC #1103 for more information on this meeting.

***Uranium City Community Meeting with Camsell Portage Attending Virtually – June 11, 2024 (evening):*** During the Uranium City Community Meeting, dialogue was primarily related to Project technologies and notably centred around freeze wall technology. Attendees sought information on the freeze wall through questions such as, “are the freeze walls keyed into the basement rock?” and, “How thick is the freeze wall once it’s in place?” Similarly, attendees sought clarity on processes by which groundwater is protected. This was shown through questions relating to groundwater remediation, monitoring wells, and the potential for mining fluid to migrate outside of the mining area. Please see **Appendix B** ROC #1104 for more information on this meeting.

***Fond du Lac First Nation Community Meeting – June 12, 2024 (canceled):*** Denison was informed by the YNLR on June 7, 2024, of the cancellation of the community meeting in Fond du Lac, owing to unforeseen circumstances.

***Hatchet Lake First Nation Community Meeting – June 13, 2024 (evening):*** Dialogue that occurred throughout the Hatchet Lake First Nation Community Meeting centred largely around the mining area, particularly with respect to containment and the freeze wall. This was emphasized through questions such as, “Will those chemicals be able to escape out of the freeze wall?” Similarly, attendees looked to confirm the freeze wall timeline in relation to a phased approach to mining through questions such as, “Mining will be done in phases. What do you do with the freeze wall when you move on to future phases?” and, “Will the freeze walls of earlier phases stay frozen while later phases are mined? In the long run will

anything escape to the environment?" A common theme can be inferred from this dialogue: the potential impacts associated with the ISR mining process and related mitigation and contingency measures. By asking for clarification on the potential for an accidental release should the freeze wall fail and expressing a consideration of remediation, attendees emphasized a regard for subsurface impacts in both short terms and long-term contexts, evidenced by the questions: "How will you protect against radiation from escaping the leaching area?"

While the primary point of emphasis throughout the Hatchet Lake First Nation Community meeting related to the subsurface environment, additional topics were discussed as guided by questions and comments expressed by attendees: i) Attendees asked questions and shared thoughts about engagement processes, ii) Attendees asked questions and shared thoughts about the impacts of sulfuric acid on vegetation, iii) Attendees shared thoughts about impacts to the fishing economy as a result of reporting, iv) Attendees looked to confirm that Denison would have a water treatment plant, v) Attendees shared thoughts about water quality requirements per federal and provincial legislation in the context of fishing and food industry standards, vi) Attendees asked questions about Project components, vii) One attendee referenced the Project footprint, stating that, "[The] small footprint of the project is ok, but the community looks at the new disturbance along with a lot of other activities that are happening on the landscape. Cumulatively, the footprint of mining is not small to communities." Please see **Appendix B ROC #1105** for more information on this meeting.)

**Letter – November 1, 2024:** On November 1, 2024, Denison mailed YNLR a letter of notice to share the status of the Environmental Impacts Statement per the provincial regulatory process (**Appendix B, ROC#1147**).

**Meeting – November 14, 2024:** On November 14, 2024, Denison met with the YNLR to discuss the resolution of comments on the EIS. Discussion focussed on monitoring plans, freezing technology, and terrestrial/cumulative effects. On December 17, 2024, the YNLR sent an email to Denison summarizing that they were satisfied with Denison's responses to several areas of their concerns and were optimistic that further review and anticipated responses from the provincial government and CNSC will address the remaining items. (see **Appendix B, ROC #1162**).

**Letter – April 17, 2025:** Denison sent a letter to YNLR with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.

### **Future Engagement Activities**

Denison expects to continue working with the YNLR, throughout the remainder of the environmental assessment and approval process and into the licensing process, to coordinate engagement activities in relation to topics of interest in relation to the Project.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the IER.

## **1.8.2.4 Engagement Activities Associated with YNLR-Specific Processes**

As noted in **Section 1.8.2.2**, above, Denison entered into two Letter Agreements with the YNLR in relation to the Project in 2021 to provide capacity support to enable YNLR to contribute to the EIS. As a result of the Letter Agreements, YNLR and Denison have developed engagement activities specific to YNLR, funded by Denison:



1. In March 2022, the YNLR transmitted and expressed support for inclusion in the EIS of their report entitled “An Exploration of Recorded Athabasca Denesų́liné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of Denison Mines Wheeler River Project” (YNLR 2022). This report, funded by Denison, focused primarily on the Athabasca Denesų́liné First Nations including Hatchet Lake, Black Lake, and Fond du Lac. Indigenous Knowledge and LK within this report, as well as publicly available information, has been integrated into the EIS with focus on the Athabasca Denesų́liné communities. This report is an amalgamation of known information from YNLR and was not collected explicitly for the purposes of the Project and, as such, should be interpreted with caution.

These reports have contributed to the information Denison is presenting in the EIS with respect to the knowledge and information by and about YNLR. Please see **Section 3 Table 3.5-1** of the EIS for more information.

2. Review by YNLR of EIS information prior to filing draft EIS with Regulators.
  - a. Denison shared EIS information (in the forms of specific sections of the EIS) with YNLR prior to filing the draft EIS with the Regulators, to provide YNLR an opportunity to review information made in reference to YNLR, including that information provided to Denison in the report authored by YNLR, as identified above. As a result, the sections shared with YNLR were:
    - Section 3 – Indigenous Knowledge
    - Section 11 – Land and Resource Use: Indigenous Land and Resource Use

During this pre-review, YNLR expressed concern regarding the classification of the Athabasca Denesų́liné First Nations (specifically Hatchet Lake First Nation) as Indigenous Communities rather than Indigenous Communities of Interest. Denison responded to this concern in a letter to YNLR on October 7, 2022, which also included a disposition table responding to each specific concern identified by YNLR. As necessary, Denison has also addressed these other concerns in the relevant sections of the EIS.

### **1.8.2.5 Ya'thi Néné Lands and Resources Office Public Comments on Draft Environmental Impact Statement and Related Processes**

An important part of the engagement of Interested Parties for the Project is facilitated by federal regulators, and occurs vis-à-vis a public review of the draft EIS. During this public review of the draft EIS, Interested Parties can submit their views in writing on the adequacy of the information presented in the EIS, as measured against appropriate guidance materials, and on the technical merit of the information presented in the EIS.

The CNSC offered participant funding to assist Indigenous peoples, members of the public, and stakeholders in the review of the draft EIS. This participant funding offering was available from January 10, 2022, to March 14, 2022. On November 21, 2022, public comments were invited on the draft EIS by the CNSC.

On March 4, 2023, the YNLR submitted public comments on the draft EIS to the CNSC (Government of Canada 2024), which comprised 64 technical comments.

On July 18, 2023, Denison and the YNLR met to discuss the YNLR's public comments on the draft EIS.

On July 20, 2023, the YNLR sent Denison a letter outlining the YNLR's preferred approach for Denison to respond to the YNLR's public comments on the draft EIS, which was that they wished to have Denison provide a written response to all items raised in the public comments on the draft EIS (see **Appendix B** ROC #920).

On November 23, 2023, following work undertaken with the YNLR since receipt of the July 20, 2023, letter to Denison from the YNLR, Denison responded to YNLR's public comments made on the draft EIS (see **Appendix B** ROC #971).

On February 2, 2024, following Denison's response to YNLR's public comments made on the draft EIS, in advance of the technical meeting between Denison and the YNLR in support of resolution of issues raised by the YNLR on the draft EIS for the Project YNLR provided a letter to Denison outlining their perspective on the status of comments (see **Appendix B**, ROC #1044).

On February 22, 2024, in support of resolution of issues raised by the YNLR on the draft EIS for the Project, Denison and the YNLR held an in person technical meeting focused on cumulative effects, with both Denison's and YNLR's technical experts in attendance. Both YNLR and Denison provided presentations centered around cumulative effect methodology, and YNLR provided an overview on environmental monitoring and management with reference to Denison's responses to YNLR comments on the environmental impact statement for the Wheeler River Project.

On February 23, 2024, following their recent technical meeting, Denison emailed the YNLR and provided to YNLR copies of: i) the meeting agenda, ii) Denison's presentation, iii) The Caribou Management Framework that was filed with the revised draft environmental impact statement for the Wheeler River Project, iv) the WRP draft EIS Section 16- Summary of Monitoring & Follow-up Programs for Wheeler River, and v) Denison's commitments register updated as of filing of the draft EIS on February 10, 2024 (see **Appendix B**, ROC #1081).

On March 13, 2024, the YNLR provided additional comments on Denison's November 23, 2023 EIS responses. The YNLR indicated that Denison's initial November 23, 2023 responses on pages 19 to 39 dealt with woodland caribou, cumulative effects, and other terrestrial matters and as such they were addressed in the February 22, 2024 meeting with Denison and representatives from Ecometrix (see **Appendix B**, ROC #1084).

On April 5, 2024, Denison provided responses to YNLR's March 13, 2024 comments and indicated that Denison would consider YNLR's comments resolved in instances where no follow up comment has been provided. This correspondence from Denison outlined a number of specific commitments from Denison in respect of the draft EIS comments made and the further March 13, 2024 comments. (see **Appendix B**, ROC#1085).

On April 30, 2024, Denison requested an update on the status of comment resolution from Ya'thi Néné Lands and Resource Board, following a recent meeting between Denison and the YNLR in which a number of items were discussed (see **Appendix B** ROC #1089)

On June 19, 2024, the YNLR provided a letter to update Denison on the status of YNLR comments made on the draft EIS for the Wheeler River Project following measures taken in pursuit of comment resolution to date. YNLR indicated that they do not consider any of their concerns expressed in their February 2, 2024, and March 13, 2024 letter to be resolved (see **Appendix B**, ROC #1110).

On June 28, 2024, Denison provided a response to the YNLR, clarifying Denison's position on the various endeavours undertaken in pursuit of comment resolution, and seeking clarity from the YNLR in relation to the process by which YNLR desires to have undertaken in order to move forward toward the resolution

of outstanding concerns. This correspondence reiterated several commitments made by Denison in response to the concerns and requests made by the YNLR over the entirety of the public review process for the Project (see **Appendix B**, ROC #1112).

On December 17, 2024, the YNLR sent an email to Denison summarizing that they were satisfied with responses to several IRs and remain optimistic that further review and anticipated responses from the provincial government and CNSC will address the remaining items. (see **Appendix B**, ROC #1162). Denison has committed to the process that YNLR has requested and anticipates that the remaining issues and concerns will be resolved in the foreseeable future.

All efforts and outcomes in relation to future efforts will be documented in forthcoming updates to the EIS and / or the IER.

#### **1.8.2.6 Ya'thi Néné Lands and Resources Office Key Interests, Issues and Concerns**

A summary of key interests, issues and concerns gathered throughout the course of engagement for the Project, including any formal submissions made through the regulatory process, are identified in **Appendix C-10**. It is important to note that areas of identified interest, issues or concerns are not always related to environmental effects as defined by CEAA 2012 (the regime under which the Project is undergoing regulatory assessment) - they can be reflective of general areas of interest in relation to the Project more broadly. Where appropriate, the table aims to provide clarity with respect to this distinction.

### **1.8.3 Engagement with Meadow Lake Tribal Council and Prince Albert Grand Council**

As noted in the introduction to this section, Denison corresponded with MLTC and PAGC to keep them informed of key project stages. As interactions were few, they have been grouped together in this subsection.

In 2019, MLTC and PAGC were identified by the CNSC as potentially having an interest in the Project. As a result, Denison sent correspondence to them in 2019 with information about the Project; in March 2020 informing them of the temporary suspension of the EA; and in January 2021 about the Project Restart. As of January 2024, Denison has not been contacted by either Council in respect of the Project.

On March 5, 2023, the PAGC submitted public comments on the draft EIS to the CNSC (Government of Canada 2024). Due to an administrative error, Denison was unaware these comments had been submitted to the CNSC. Upon realization of this situation, Denison provided a direct response to the PAGC comments.

On June 6, 2024, Denison responded to the PAGC's public comments on the draft EIS (Please see **Appendix B**, ROC #1099)

## **1.9 Influence of Engagement on the Assessment**

The interests, issues and concerns shared as a result of engagement activities have meaningfully informed the Project and the environmental assessment process. This includes valuable perspectives that were provided and influenced the Project, the selection of VCs, identification and consideration of potential effects, as well as mitigation and monitoring of impacts.

Details about how information received from Indigenous groups is recorded and considered is documented as part of this IER, referring to pertinent sections of the EIS.

## 2 Indigenous Knowledge and the Environmental Assessment of the Project

Each Indigenous community/organization defines Indigenous Knowledge (IK<sup>1</sup>) in their own way. Although no universally accepted definition of IK exists, an understanding of the key features and defining characteristics of IK is offered by Indigenous communities and in the literature. Canadian Environmental Assessment Agency (CEAA) (2015)<sup>2</sup> provides the following definition of IK:

*“Generally, ATK [Aboriginal Traditional Knowledge] is considered as a body of knowledge built up by a group of people through generations of living in close contact with nature. ATK is cumulative and dynamic. It builds upon the historic experiences of a people and adapts to social, economic, environmental, spiritual and political change.”*

Indigenous Knowledge also can be understood as the unique and collective knowledge of Indigenous peoples that may include, but is not limited to, the environmental, cultural, economic, political, and spiritual conditions of a community or region (CEAA 2015). This knowledge is passed down orally from generation to generation by Elders and is best understood in an Indigenous language to not lose any meaning through translation. Indigenous Knowledge has been developed by Indigenous groups after generations of living in close contact with the land and, fundamentally, this knowledge holds respect for each other and the earth.

Local knowledge (LK) is defined as specialized knowledge developed through long-term association, interaction, and cumulative experience (IAAC 2020). It is context-specific and unique. Local knowledge can be held by individuals, organizations, or communities. Local knowledge holders can be Indigenous or non-Indigenous (IAAC 2021). The information held does not need to be validated and vetted through processes commonly applied in the collection of IK, which is considered as community-held and shared knowledge.

This section discusses the value of IK in Environmental Assessment (EA), the regulatory environment, IK and LK sources, and the approach to IK taken in the EA.

### 2.1 The Value of Indigenous Knowledge in Environmental Assessment Practice

Indigenous Knowledge plays an important role in the environmental assessment of major projects in Canada, with the understanding that different types of knowledge and diverse perspectives are needed to obtain a full understanding of the existing conditions in which a project is proposed, the potential effects of a project, and the significance of those effects, especially to Indigenous Peoples (BC EAO 2020).

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<sup>1</sup> Also known as Aboriginal Traditional Knowledge or ATK and Traditional Ecological Knowledge or TEK.

<sup>2</sup> The Canadian Environmental Assessment Agency of Canada is now the Impact Assessment Agency of Canada.

Inclusion of Indigenous Knowledge strengthens all stages of EA in the following ways (MVEIRB 2005; BC EAO 2020):

- ensures the perspectives and concerns of Indigenous peoples are heard;
- provides information, including historical information, that may not have been available through other sources;
- leads to better decisions, including improved project design and stronger mitigation measures;
- identifies and defines valued components; and
- identifies potential project effects to be included in the Environmental Impact Statement (EIS).

## 2.2 Indigenous Knowledge Approach

### 2.2.1 Guiding Principles for the Inclusion of Indigenous Knowledge

Broadly, Denison Mines Corp. (Denison) has committed to working with Indigenous communities in a spirit of mutual respect and cooperation. Denison's Indigenous Peoples Policy reflects the company's belief that reconciliation is advanced through collaboration with Indigenous peoples and communities to build long-lasting, respectful, trusting, and mutually beneficial relationships (Denison 2021). Denison's Indigenous Peoples Policy was developed based on the company's experiences with, and feedback and guidance from, Indigenous communities with whom the company is engaged. This approach makes sure that the policy captures a mutual vision for reconciliation and one that is best advanced through action (Denison 2021). The policy was developed to be consistent with the standards and principles in The United Nations Declaration on the Rights of Indigenous Peoples (UN 2007) and the Call to Action 92 (Business and Reconciliation) from Canada's Truth and Reconciliation Commission (TRC 2015).

### 2.2.2 Respecting Community Protocols and Procedures for Indigenous Knowledge

Access to IK is a privilege and must be respected. Prior to sharing and collecting IK, current local protocols and procedures developed by the Indigenous Community of Interest ("Indigenous COI") for the management of IK must be understood and followed. Consideration was also given to consent processes directed by the community to approve what information becomes publicly accessible and included in the EIS. For some specific sources of IK, the treatment of the IK was determined formally through various types of agreements. To date, Denison has received permission to use and reproduce English River First Nation (ERFN) land use mapping located in the Project Terms of Reference (Denison 2019). Denison also has received permission to use two ERFN summary documents of a health and socioeconomic study (ERFN and SVS 2022a) and a Traditional Knowledge study (ERFN and SVS 2022b) as per 'Permitted Purposes' defined in an ERFN/Denison Participation and Funding Agreement. Denison fully funded both studies.

The Kineepik Métis Local #9 of Pinehouse has provided permission (Denison 2019) to use Geographic Information System (GIS) data collected as part of 2011 and 2018 use and occupancy studies (Tobias and Associates 2018a). Denison funded 75% of the 2018 land use and occupancy study. To protect the privacy of the IK, new maps have not been generated from the GIS points; instead, a generalized map has been used in Indigenous Land and Resource Use, **Section 11.1** of the EIS.



The MN-S entered into a capacity funding agreement with Denison to produce a Métis Knowledge Study, which was provided to Denison in October 2024. Information sharing protocols were included in the agreement consistent with MN-S expectations on confidentiality. This included protocols for any disclosure of traditional land use or traditional knowledge information with other parties.

In March 2022, the Ya'thi Néné Lands and Resources Office (YNLR) transmitted their report entitled “An Exploration of Recorded Athabasca Denesųliné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of Denison Mines Wheeler River Project” (YNLR 2022) and expressed support for inclusion in the report in the EIS. This report, funded by Denison, focused primarily on the Athabasca Denesųliné First Nations including Hatchet Lake, Black Lake, and Fond du Lac. Indigenous Knowledge and LK within this report, as well as publicly available information, has been integrated into the EIS with focus on the Athabasca Denesųliné communities. This report is an amalgamation of known information from YNLR and was not collected explicitly for the purposes of the Project and, as such, should be interpreted with caution. At the YNLR's request, the March 2022 report is included as an appendix to the EIS (See **Appendix 3-A**).

### 2.2.3 Identifying Indigenous Knowledge Holders

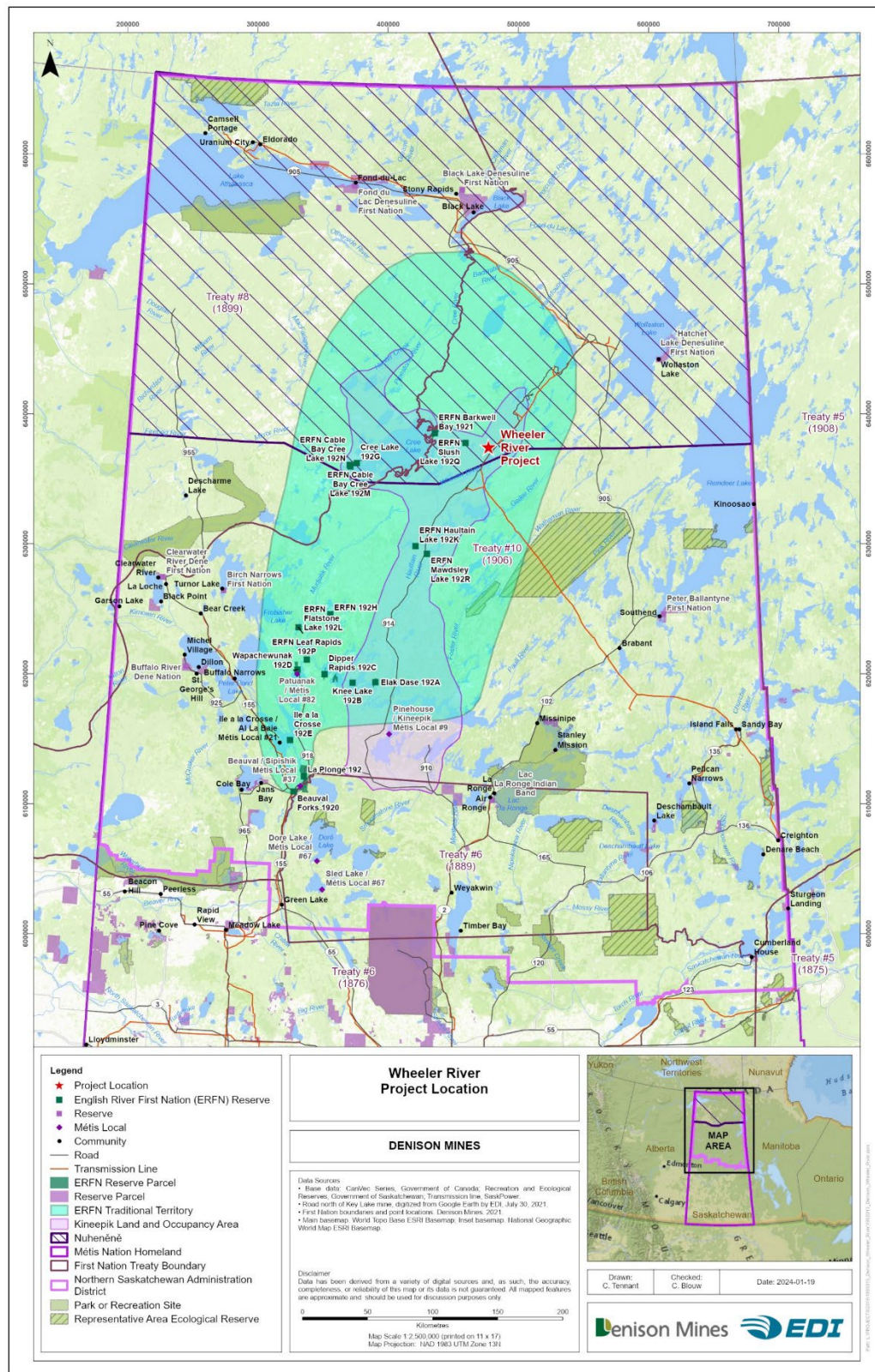
An important initial step in the development of the EIS was to identify IK holders. The step is linked to how Indigenous communities were identified in the context of Project-related engagement. **Engagement (Section 4.2 of the EIS)** describes how “Interested Parties” were identified and the process for selection. Broadly, Interested Parties are defined as any person or organization that can affect, be affected by, perceive itself to be affected by, or is interested in a decision or activity related to the Project.

In identifying Indigenous communities as Interested Parties, three sub-groups were identified:

- **Indigenous Community of Interest (Indigenous COI):** a community whose traditional land or potential or established Aboriginal and/ or Treaty rights are in proximity to the Project or has existing transportation infrastructure that would be used by the Project. An Indigenous COI is more likely to experience impacts from the Project.
- **Indigenous Community:** an Indigenous community with a potential interest in the Project, including any Indigenous community identified by a Regulatory Agency as having a potential interest in the Project.
- **Indigenous Organization:** an organization that is owned, operated, or delegated to represent Indigenous Communities in connection with the Project.

With respect to the identification of IK holders, the Indigenous COI formed the basis of where IK was explicitly sought by Denison, although Indigenous Organizations also offer relevant sources of information.

**Figure 2-1**, below, displays the Project location relative to the Indigenous COIs: the ERFN at Wapachewunak, the Métis Local #82 of Patuanak, the Kineepik Métis Local #9 of Pinehouse, and the Sipishik Métis Local #37 of Beauval. Other Indigenous communities include the Dore/Sled Lake Métis Local #67, the A La Baie Métis Local #21, Birch Narrows Dene Nation, Buffalo River Dene Nation, Lac La Ronge Indian Band, and the Athabasca Denesųliné First Nation communities including Fond du Lac First Nation, Black Lake First Nation, and Hatchet Lake First Nation. Indigenous organizations (not shown on map) include the Métis Nation- Saskatchewan, who has been delegated the Duty to Consult for a number of Métis locals, and the YNLR, who represent the Athabasca Denesųliné First Nations.



**Figure 2-1: Overview of Project Location Relative to Communities**

## 2.2.4 Sources of Indigenous Knowledge

Denison has, and is, supporting several processes to aid community-led collection of IK. These processes are at different stages of completion. Denison will continue to consider and integrate results from any forthcoming materials provided by communities as it advances the EIS process.

### 2.2.4.1 English River First Nation at Patuanak

The English River First Nation is a Denesųliné community, comprised of both Denesųliné and Cree people, with ancestral lands (*nuhtsiyw-kwi-Benéne*) stretching from the Churchill River to Wapata Lake in northern Saskatchewan.

*“The ERFN name originates from the English River area, which was inhabited by the Poplar House people for periods during the year. Most of the families that now live at the Wapachewunak Reserve traditionally lived along the Churchill River system at Primeau Lake, Knee Lake, Dipper Lake and/or Cree Lake to the north (Canada North Environmental Services, 2017). Summers were spent primarily fishing along the river system. For the rest of the year, family units would spread out through the northern forests for trapping and subsistence hunting. Commonly used winter trapping areas included Haultain Lake, Costigan Lake, Foster Lake, and the area between Cree Lake and the Churchill River (Jarvenpa, 1980)” (ERFN and SVS 2022a).*

English River First Nation provided a land use map dated 2017 for Denison to gain an understanding of the extent and distribution of land use in the Project area. This map is published in the Project Terms of Reference (TOR; Denison 2019). To supplement the mapping information, funding was provided to ERFN to write their own independent contribution to the EIS, with assistance from Shared Value Solutions. English River First Nation produced a draft Traditional Knowledge Study and Health and Socio-Economic Study Results document that was split and finalized into two summary reports: 1) Wheeler River Project – Summary of Health and Socio-Economic Study Results (ERFN and SVS 2022a); and 2) Wheeler River Project – Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b). The studies collectively documented baseline land use and socio-economic conditions and identified Project-related concerns and opportunities.

The first report summarizes results from sixteen interviews that were conducted for the health and socio-economic section (ERFN and SVS 2022a). The second study, i.e., the traditional knowledge study, conducted, analyzed, and presented results from 21 land use interviews, which provided both IK and LK (ERFN and SVS 2022b). The Traditional Knowledge study included maps of ERFN ecological knowledge features, personal harvesting sites, commercial harvesting sites, and occupancy sites. The Traditional Knowledge component also considered data collected with ERFN Elders in the 1980s and an analysis to look at the cumulative effects of industry on ERFN traditional territory.

### 2.2.4.2 Kineepik Métis at Pinehouse

The Kineepik Métis “are considered Woodland Cree, Woodland Dene and Woodland Métis, although historical documents indicate that the member of (the Kineepik Métis Local) came from a diverse range of Métis, First Nations, and other backgrounds. The Northern Village of Pinehouse is located within the digitally mapped traditional territory of Indigenous people of Kineepik Métis Local. (They) have used these lands surrounding Missinippi (Churchill River) watershed for gathering food, shelter, and material supplies since time immemorial.” (KML 2022).

In 2018, the Kineepik Métis Local #9 at Pinehouse approached Denison to support a land use mapping initiative in the Project area. The 2018 study builds on the land use mapping completed in 2011 by



extending the spatial boundaries (Tobias and Associates 2018a). Methods used in the 2018 data collection are documented in Tobias and Associates (2018b) and results represent input from 128 respondents in 2011 and 55 respondents in 2018. The 2011 study area focussed on the community and environs north to George Lake and the 2018 study area focussed on the area north of and contiguous with the 2011 study area (from George Lake to north of Cree Lake Including the Project area). The essential methodology remained consistent for both iterations (Tobias and Associates 2018b). The Tobias and Associates (2018b) methods report indicates that collectively, the results from the 2011 and 2018 surveys represent the contemporary land base of Pinehouse residents determined “*primarily by locations where residents procure fish, birds, mammals and plant resources for direct family consumption*”. A verification meeting was held in late 2018 to make sure no geographic data gaps existed and that the results speak for the whole community.

In 2022, the Kineepik Métis Local #9 (KML 2022) prepared a document to voice their perspectives on Project valued components and to provide a record for EIS development. Based on 12 community engagement sessions and review of the land use maps described above, the Kineepik Métis explained their unique social, cultural and historical context, expressed a general consensus of support for the Project, and described issues and concerns. The Kineepik Métis indicated that they regard Denison’s engagement approach as a best practice process, which has surpassed any previous engagement protocols experienced before (KML 2022). As a result, the community is looking forward to continuing the engagement process with Denison and working collaboratively through any issues and concerns (KML 2022). Additional IK and LK was drawn from Kineepik Métis Local #9’s “Response to the Environment Impact Assessment for the proposed Ministry of Highways 914 Extension Project” which, while expressing concerns about the proposed highway, also identified IK and LK priorities and concerns within the community (KML and NVP 2022).

### **2.2.4.3 Métis Nation – Saskatchewan**

The Métis Nation – Saskatchewan represents the province’s Métis citizens, with the Métis Nation Legislative Assembly as their governing authority. *“The Métis emerged as a distinct people/Nation in the historic Northwest during the course of the 18<sup>th</sup> & 19<sup>th</sup> centuries prior to Canada becoming a formal nation state. While the initial offspring of these unions were individuals who possessed mixed ancestry, the gradual establishment of distinct Métis communities, outside of First Nations and European cultures and settlements, as well as the subsequent inter-marriages between Métis women and Métis men, resulted in the genesis of a new Indigenous people – the Métis. The definition of Métis as adopted by Métis Nation–Saskatchewan is: ‘a person who self identifies as Métis, is of historic Métis Nation ancestry, is distinct from other Aboriginal peoples, and is accepted by the Métis Nation’”* (Métis Nation – Saskatchewan not dated).

In recognition of the MN-S’ potential interests in the Project, Denison and MN-S entered a capacity funding agreement to produce a Métis Knowledge Study.

In October 2024, the MN-S submitted The Wheeler River Project: Métis Knowledge Study Report (MN-S and Two Worlds Consulting 2023) to Denison. The Métis knowledge summarized therein included secondary literature approved for use by the MN-S and primary information collected during interviews with nine Métis citizens from Northern Region 1 (NR1) and Northern Region 3 (NR3), exclusive of information from the KML at Pinehouse who formally revoked its delegated Duty to Consult from the MN-S.

The study included an introduction; a description of the Métis in Saskatchewan; the methodology for the study; Métis knowledge; Métis ways of knowing, doing and living; and findings and recommendations relative to the Project (MN-S and Two Worlds Consulting 2023). The study occurred in three phases:

planning, engagement, and reporting. After a kick-off meeting with the MN-S and NR1 and NR3 locals to introduce the Project, an in-person community-based workshop with MN-S was held to develop the overall methodology, schedule, mapping templates, and interview guides. The draft interview guide was reviewed in that process, and customized to MN-S preferences. The interview guide followed a semi-structured approach to encourage information sharing.

Nine Métis advisors were selected for interviews if they met the criteria of having lived in NR1 and/or NR3, previously worked in NR1 and/or NR3, and/or had strong kinship ties to NR1 and/or NR3 and were able to share Métis knowledge learned through oral history. The spatial boundaries were based on the Northern Saskatchewan Administrative District, which encompassed NR1 and NR3. The draft EIS was updated to include Métis knowledge where relevant to the Valued Components (VCs) assessed.

#### **2.2.4.4 Athabasca Denesųliné Communities**

The communities of Black Lake, Fond du Lac, and Hatchet Lake Denesųliné First Nations are collectively referred to as the Athabasca Denesųliné. *“Fur traders originally referred to the Denesųline as the Northern Indians and later as the Caribou Eaters or Ethen-eldeli (Smith 1981, Elias 2003, Usher 1990, Bone et al. 1973). (They) have also been called Chipewyan; a name (they) found offensive since it was given to (them) by (their) traditional enemies, the Cree. In recent times, (they) have moved away from both terminologies, preferring the term Denesųline, meaning ‘the Real or Genuine People’. This is the term (their) ancestors used to define themselves.”* (YNLR 2022). The project is located within the Nuhenéné, traditional territory of the Athabasca Denesųliné.

The Ya'thi Néné Lands and Resources Office is the point of contact for and representative of the Athabasca Denesųliné communities of Black Lake, Fond du Lac, and Hatchet Lake Denesųline First Nations, as well as the northern hamlets/settlements of Stony Rapids, Wollaston Lake, Uranium City, and Camsell Portage. The YNLR provided their report, named *An Exploration of Recorded Athabasca Denesųliné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of Denison Mines Wheeler River Project*. This report summarized traditional knowledge and land use and occupancy information collected for various other projects and initiatives, documenting Athabasca Denesųliné use in the Project area, although it was not considered as a site-specific study. The Athabasca Denesųliné have participated in many traditional knowledge studies since the 1970s and the study provided to Denison uses these existing datasets to document traditional knowledge, land use, and occupancy near the Project with the goal of supporting the regulatory process. The study documents the importance of caribou to the Athabasca Denesųliné, their history, and maps showing land use and occupancy sites and traditional knowledge within the Nuhenéné, traditional territory of Athabasca Denesųliné. Athabasca Denesųliné land use is further described in **Section 11** of the EIS.

#### **2.2.5 Indigenous Knowledge Values and Worldviews**

Indigenous Knowledge is generated by millennia of experience in natural resource management and environmental decision-making practice (Eckert et al. 2020). Indigenous Knowledge systems, therefore, make valuable contributions to and improve the rigor of EA (Government of Canada 2019). It should be noted that IK systems are not homogenous or universal because they are grounded in the local history and experience of different Indigenous groups. As noted previously, communities determine the content and the degree to which IK is shared.

The ERFN, the Kineepik Métis Local #9 of Pinehouse, and the Athabasca Denesųliné, have shared some of their key values and worldviews to inform the EA process for the Project. For example, maintaining the

health of both the ecological world and the human world is a guiding principle in many of ERFN's teachings (ERFN and SVS 2022a). Through extensive experience on the land, IK of fish spawning areas, mammal habitat, important waterways, and wildlife migration corridors is held by ERFN members in the Project area and throughout the ERFN traditional territory, Nuhtsiye-Kwi Benene (ERFN and SVS 2022b). The land, in turn, takes care of the people.... *"it's like our plate; it gives us everything. The land gives us the food that we need, it gives us the clothing that we need, it gives us the heartbeat that we need."* (ERFN and SVS 2022b). On the connectivity between people and the land, an ERFN member stated: *"Water is seen as a source of life, a part of every living being, and an interconnected network that flows through everything."* (ERFN and SVS 2022b).

English River First Nation also point out differences for conceptions of land between IK and western knowledge systems. English River First Nation explained that to understand the sociological and cultural context of ERFN, western knowledge holders are encouraged to avoid considering land as *terra nullius*, or as empty space available for extraction or development (ERFN and SVS 2022a). They state that bridging cultures requires understanding how these cultural conceptions differ (ERFN and SVS 2022a).

Transmission of knowledge is important to cultural continuity. The ERFN explain that *"Dene and Cree cultures are oral-based knowledge systems"*, meaning that the language is the primary way through which their teachings (e.g., values, stories, history, relationships with land, and governance decisions) are passed on from generation to generation. As a result, several cultural and language revitalization programs are underway in the community (ERFN and SVS 2022a).

The Kineepik Métis' traditional territory, within which the proposed Project is situated, has been used by the people for gathering food, shelter, and material supplies since time immemorial (KML 2022). Land use is not only for securing food; Kineepik Métis hunt and gather for cultural, language, and identity purposes as well (KML 2022).

The Kineepik Métis Local #9 of Pinehouse have indicated the importance of language in the transmission on knowledge (KML and NVP 2022). The efforts to revitalize language and culture has had momentum for over a decade at Pinehouse and is moving towards an organic beginning of self-governance (KML and NVP 2022).

*"Being the nearest community south of the uranium mining operation (the Kineepik Métis Local #9) have worked with the uranium industry for many years, formalizing partnerships with Cameco Corporation and Orano Canada in 2012 with a collaboration agreement. These relationships have allowed (Kineepik Métis Local #9) to understand the impacts stemming from projects throughout their lifecycle from (their) unique Indigenous lens"* (KML and NVP 2022).

The Kineepik Métis have completed their cultural calendar, which is comprised of the current annual traditional activities (KML 2022). This process includes the seasonal changes and adjustments of cultural activities within those changes, which include celebrations of cultural events that bring pride to community members (KML 2022).

The Kineepik Métis Local #9 also reflect on interconnectedness of language, cultural and land stewardship:

*"While industrial development created employment and business opportunities it has also exerted extreme pressure to conform to western cultural practices. This pressure creates an erosion of language and cultural practices... the loss of language included the loss of cultural understanding – as we lose our language, we lose our connection to the land. We lose our ability to communicate with our elders. Once the connection to the land is lost, then the spirit of*



*conservation and concern for how the ecosystems are defined by our elders is also lost. The is the very nature of diversity as we the Indigenous peoples have know then land for time immemorial, the connection is irreplaceable, authentic, and inherent.” (KML and NVP 2022).*

Similarly, the Athabasca Denesųliné note the interconnection among people and the land, explaining that Athabasca Denesųliné *“culture, history and way of life are interwoven with the movements and the health of the Beverly, Ahiak and Qamanijuaq barren-ground caribou herds. We are so intrinsically tied that it is often stated that the Caribou are Dene; Dene are caribou”* (YNLR 2022). As the “lifeblood” of the Athabasca Denesųliné, the range of caribou—which fluctuates due to natural cycles, climate change, forest fires, industrial development, and other factors—defines the extent of their traditional territory (YNLR 2022).

*The Wheeler River Project: Métis Knowledge Study Report* explained that kinship relationships, and the relationship to the land, are paramount to their culture:

*“These kinship relationships between our communities and families, as well as those with our extended First Nations relation, are vital to our success as a community. As such, our traditions are often a blend of Michif, Cree, and Dene spirituality, as well as the Christian traditions. This blend forms a foundational piece of our understanding of our role in the world and in our communities and families.”* (MN-S and Two World Consulting 2023).

Michif is a distinct language, combining French and Cree, and evolved from communication between the Indigenous mothers and European fathers, although Métis spoke many Indigenous languages through intermarriage among regions. Storytelling and oral histories are a time honoured concept, with stories retold year after year, with each telling allowing listened *“to understand things differently while they age(d) and gain(ed) experience”* (MN-S and Two Worlds Consulting 2023).

Similarly, Métis artistic expression is a blend of Indigenous and European styles, reflective of the regional differences and communities from which individuals came:

*“Beadwork, embroidery, and quillwork showcase intricate patterns and motifs that tell stories of cultural intersections and shared histories. Métis artisans often incorporate natural materials like porcupine quills, moose hair, and birch bark into their creations, highlighting a deep connection to the land”* (MN-S and Two Worlds Consulting 2023).

## **2.2.6 Interweaving Indigenous Knowledge and Western Scientific Knowledge**

In the context of contemporary decision-making, Denison recognizes that IK systems offer an alternative source of knowledge, often complementary to western science (Eckert et al. 2020). Inclusion of IK alongside western scientific knowledge should be considered through all phases of an effects assessment. This not only addresses regulatory expectations, but also recognizes the value IK adds to project planning, the completion of the EIS, and throughout the lifespan of the Project. The degree to which each community has contributed may vary because they decide what IK and LK they want to share, how it should be collected, and how it should be included in the EA process.

## **2.2.7 Addressing Divergence Between Indigenous Knowledge and Western Scientific Knowledge Systems**

In response to instances where IK and western science diverge, Denison has established principles to address and resolve potential disagreements. These principles are outlined in more detail, in **Section 4.0**

of the EIS, as part of the Engagement plan; however, action to resolve diverging perspectives begins when concerns are raised about the EA process, the Project, or its potential impacts. Denison seeks to:

- collaborate with IK holders in developing potential solutions to those concerns;
- where necessary, adjust the initial plans for the Project to reduce potential impacts and accommodate Rights and interests; and
- make active and good-faith efforts to resolve all material issues in the above-identified fashion.

Using this approach, Denison seeks mutually acceptable agreement where western science and IK diverge. This not only addresses regulatory expectations, but also recognizes the value IK adds to Project planning including greater knowledge about the environment, understanding of potential impacts of the development, identifying mitigation, and the significance of those impacts.

In cases where IK and western scientific disagreement cannot be resolved, EIS authors were instructed to note the divergence in the limitations at the beginning of each discipline section as well as in the concluding sections that discuss confidence in the assessment determinations and how this has been addressed in the proposed mitigation and monitoring.

Discrepancies among IK and western scientific information provide an opportunity for Denison to take a precautionary approach. Examples of concrete actions to address uncertainty in cases where IK and LK have differing conclusions on predicted Project effects include addressing uncertainty through monitoring and follow-up programs and communicating results of those monitoring and follow-up programs to demonstrate they have been responsive to the IK shared.

## 2.3 Summary of Indigenous Knowledge in the Environmental Assessment

During the EIS, inclusion of IK provided greater knowledge about the environment and understanding of potential effects of the Project and the significance of those effects. **Table 2-1**, below, contains a record of how IK has been interwoven into the existing environment and effects assessment sections. The information is sorted according to discipline and detailed for each relevant aspect of the assessment.

**Table 2-1: How Indigenous Knowledge was Incorporated into Existing Environment and Effects Assessment Sections**

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
Groundwater	Project Design	7.2	Comments associated with concerns to groundwater quality, changes in water levels and quantity, and discharge to the environment were significant and these were considered within the context of community interest in the groundwater remaining supportive of surface water quality and discharge quantity and impacts to groundwater levels and quality. To this end, groundwater management, monitoring, mitigation, and evaluation of groundwater impacts are important to maintaining groundwater levels and water quality within the Local Study Area (LSA) and Regional Study Area (RSA).	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse
	Assessment	7.4	Indigenous Knowledge was valuable to understand the concern of water levels and impacts to fish and fisheries.	English River First Nation
	Mitigation	7.5	Specific concerns over the impacts from mining.	Kineepik Métis Local #9 and Northern Village of Pinehouse
	Monitoring and Follow Up	7.8	Specific concerns with respect to understanding the local hydrogeological setting. The information in the reports was valuable to understand the need for a robust monitoring program pre-mining that takes into account water levels in the local aquifers.	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse
Aquatic Environment	Project Design	8.2.2	Environmental advantages of the in situ recovery (ISR) mining at Phoenix and the potential to avoid discharges into surface waters were noted.	Kineepik Métis Local #9 and Northern Village of Pinehouse
	Existing Environment	8.3.2, 8.3.3	Indigenous Knowledge was used to determine traditional land activities that regularly occur in the area, such as fishing and navigation (boating). Indigenous Knowledge identified two camps (ERFN Culture Camp and the Kineepik Métis [Pinehouse] camp) of particular importance to local Indigenous residents.	English River First Nation Athabasca Denesūliné First Nations and Communities

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
			Indigenous Knowledge was also important for determining traditional food consumption in the Project area, especially in terms of frequency and diet composition. The ERFN Country Foods Study was used to determine the traditional food diet.	English River First Nation
	Assessment	8.3.2, 8.3.4,	Indigenous Knowledge provided confirmation and additional information in identifying fish presence/absence and critical life history use habitats in the LSA.	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse
Terrestrial Environment - Ungulates, Furbearers, and Woodland Caribou	Existing Environment	9.3.3.1, 9.3.3.2, 9.3.3.3	Indigenous Knowledge improved understanding of species' habitat and diet preferences, calving areas, population trends, and local harvest.	English River First Nation Athabasca Denesųliné First Nations and Communities
	Assessment	9.3.6, 9.3.7	Indigenous Knowledge improved and confirmed knowledge was considered in the residual effects assessment and the cumulative effects assessment (CEA), including site access and noise disturbance.	English River First Nation Athabasca Denesųliné First Nations and Communities
Terrestrial Environment - Raptors, Migratory Breeding Birds, and Bird Species at Risk	Existing Environment	9.4.3.1.2, 9.4.3.2.2, 9.4.3.3.2	Indigenous Knowledge improved understanding of species' distribution and regional population trends.	English River First Nation
	Assessment	9.4.6.3.2, 9.4.7	Indigenous Knowledge was considered in the residual effects assessment and the CEA. Concerns about decreasing numbers in some species and increased access to the area were incorporated into the CEA.	English River First Nation
Human Health and Ecological Risk Assessment	Existing Environment	10.1.3	Indigenous Knowledge was used to determine traditional land activities that regularly occur in the area, such as fishing, hunting, trapping, and gathering.  Indigenous Knowledge identified two camps (ERFN Culture Camp and the Kineepik Métis [Pinehouse] camp) of particular importance to local Indigenous residents.  Indigenous Knowledge was also important for determining traditional food	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse Athabasca Denesųliné First Nations and Communities

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
			consumption in the Project area, especially in terms of frequency and diet composition. The ERFN Country Foods Study was used to determine the traditional food diet. IK from ERFN indicated that they have a strong connection to the land and the importance of the natural environment.	
Heritage Resources	Existing Environment	11.3.3	Indigenous Knowledge was used to confirm that the Project area contained cultural resources.	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse
Indigenous Land and Resource Use (ILRU)	Assessment Approach	11.1.2	The social, cultural, and economic value of ILRU and future goals for the continuation of ILRU was communicated.  Indigenous Knowledge provided an understanding that overall health and well-being is derived from both the consumption of resources and the practice of harvesting them, which contributed to the selection of Key Indicators.  Indigenous Knowledge indicated that the communities needed to have confidence in the ISR mining approach so this was included within the assessment and follow-up engagement designed.	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse Athabasca Denesųliné First Nations and Communities Métis Nation Saskatchewan
	Existing Environment	11.1.3.2	Indigenous Knowledge described the connection to the land for Indigenous peoples including: <ul style="list-style-type: none"> <li>the gifts of shelter and medicines that the land provides;</li> <li>the meaning and value of water;</li> <li>how respect is taught and passed on to future generations; and</li> <li>a growing desire to reconnect with the land and waters and continue traditional activities.</li> </ul> The importance of specific resources for hunting, fishing, trapping and gathering was explained including their relative importance to diet.	English River First Nation Athabasca Denesųliné First Nations and Communities Métis Nation Saskatchewan

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
	Assessment	11.1.4	<p>Specific concerns were communicated. These included:</p> <ul style="list-style-type: none"> <li>• change in the abundance of animals;</li> <li>• air quality;</li> <li>• workforce fishing levels;</li> <li>• noise;</li> <li>• potential for accidental release of pollution;</li> <li>• the safety of drinking water downstream of the treated effluent discharge pipe; and</li> <li>• the ISR mining method and its safety for animals and human health.</li> </ul> <p>These concerns were then incorporated into the assessment to determine the nature of the potential effect.</p>	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p> <p>Métis Nation Saskatchewan</p>
Other Land and Resource Use (OLRU)	Existing Environment	11.2.3	<p>Historic trapping and trapping trails were described, which provided context for the boundaries of the traditional territory.</p> <p>Commercial fishing history was described and mapped including the species harvested, the seasons, and the timeframe that commercial fishing was undertaken.</p>	<p>English River First Nation</p> <p>Métis Nation Saskatchewan</p>
	Assessment	11.2.4	The locations where commercial fishing and commercial trapping were considered in relation to potential Project effects.	<p>English River First Nation</p> <p>Métis Nation Saskatchewan</p>
Cultural Expression	Assessment Approach	12.1.2	Indigenous Knowledge confirmed the key indicators for community well-being and that residents in the LSA benefit from the employment and business opportunities that come with resource development projects.	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p> <p>Métis Nation Saskatchewan</p>
	Existing Environment	12.12.3	<p>Indigenous Knowledge was used to describe the key indicators:</p> <p>Information pertaining to knowledge transmission (inclusive of language), land-based cultural programs, land-based</p>	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p>



Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
			programming and supports, and travel routes and habitation; and traditional diet, which supports social bonds within families and communities.	Métis Nation Saskatchewan
	Assessment	12.1.4.2	Indigenous Knowledge contributed to the characterization of changes to: participation in cultural practices and subsequent knowledge transmission as a result of employment (e.g., time spent away from community because of the worker rotation schedule); location of cultural practices to support knowledge transmission because of restricted access or avoidance of areas; change in availability of country foods that support a traditional diet because of restricted access to or avoidance of hunting, fishing, trapping, and gathering areas; and change in perceived suitability of country foods that are part of a traditional diet	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse Métis Nation Saskatchewan
	Mitigation	12.1.5	Indigenous Knowledge informed mitigation for cultural expression such as: working with Indigenous communities to understand their important harvest times and cultural camps to support Indigenous employees in taking time off to participate in such events; and measures protective of Indigenous land and resource use.	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse
Community Well-Being	Assessment Approach	12.2.2	Indigenous Knowledge verified and confirmed the key indicators for community well-being and that residents in the LSA benefit from the employment and business opportunities that come with resource development projects.	Kineepik Métis Local #9 and Northern Village of Pinehouse
	Existing Environment	12.2.3.1, 12.2.3.2, 12.2.3.3	Indigenous Knowledge confirmed and verified information for the existing environment, including: <ul style="list-style-type: none"> <li>challenges and barriers to seeking post-secondary education, employment, and other economic opportunities;</li> </ul>	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
			<ul style="list-style-type: none"> <li>youth access to education and employment as a priority; and</li> <li>the importance of traditional activities including for mental health and well-being, spiritual health, and cultural identity.</li> <li>social values and kinship rooted in relationships to the land and their importance to social cohesion</li> </ul>	Métis Nation Saskatchewan
	Assessment	12.2.4.2.1, 12.2.4.2.2, 12.2.4.2.3	<p>Indigenous Knowledge confirmed and verified information for the assessment of Community Well-being, including:</p> <ul style="list-style-type: none"> <li>the challenges and barriers of the remote location of LSA communities such as access a lack of economic opportunities and employment;</li> <li>new projects (i.e., mining industry) are seen as a benefit for LSA communities including for employment and business opportunities; and</li> <li>the importance of having Elders on site at resource development projects to continue to play a role as a knowledge holders, connection to family and culture, and to provide cultural programming.</li> </ul>	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p> <p>Métis Nation Saskatchewan</p>
	Mitigation	12.2.5	<p>Indigenous Knowledge informed and confirmed mitigations for Community Well-being, including:</p> <ul style="list-style-type: none"> <li>the need for pick-up point;</li> <li>a no alcohol and drug policy on site; and</li> <li>the need for culturally sensitive employment policies that support the Indigenous workforce, such as an Elder representative to provide cultural programming or minimizing Project activity during key cultural events.</li> </ul>	<p>(Informed through existing environment and assessment)</p> <p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p>
Infrastructure and Services	Assessment Approach	12.3.2, 12.3.3.1	Indigenous Knowledge verified and confirmed the key indicators for Infrastructure and Services.	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and</p>

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
				Northern Village of Pinehouse
	Existing Environment	12.3.3.2.1, 12.3.3.3.1, 12.3.3.3.2,	Indigenous Knowledge verified and confirmed information for the existing environment, including: <ul style="list-style-type: none"> <li>highway descriptions (Highway 914 and 165) and Key Lake gatehouse access;</li> <li>education infrastructure and programming;</li> <li>health facility services, providers, and programming;</li> <li>social services and programming; and</li> <li>recreational infrastructure and services.</li> </ul>	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse
	Assessment	12.3.4.2.1, 12.3.4.2.2	Indigenous Knowledge confirmed and verified information for the assessment of Infrastructure and Services, including: <ul style="list-style-type: none"> <li>concerns for increased truck traffic and truck traffic incidents as a result of the Project;</li> <li>a need for better information on transportation safety processes; and</li> <li>concerns for becoming a through road community that could further dilute community and emergency services currently in place.</li> </ul>	Kineepik Métis Local #9 and Northern Village of Pinehouse
	Mitigation	12.3.5	Indigenous Knowledge informed and enhanced mitigations for Infrastructure and Services, including the need for an Environment and Culture Monitor and the need for an on-site Elder to provide culturally relevant programming and support.	(Informed through existing environment and assessment) English River First Nation
Economy	Assessment Approach	13.1.1, 13.1.2, 13.1.4	Indigenous Knowledge confirmed and verified the key indicators for economy and confirmed and verified the economic aspects of the Project that could be challenging or cause concern for members, including that jobs and employment should be prioritized for Indigenous communities.	English River First Nation Kineepik Métis Local #9 and Northern Village of Pinehouse Métis Nation Saskatchewan

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
	Existing Environment	13.1.1, 13.1.2, 13.1.4, 13.2, 13.2.1, 13.2.3, 13.2.4.	<p>Indigenous Knowledge confirmed and verified information for the existing environment, including:</p> <ul style="list-style-type: none"> <li>challenges and barriers to seeking post-secondary education, employment, and other economic opportunities (including barriers associated to the remote location of communities and costs and time commitments for education and training);</li> <li>the need to prioritize Indigenous communities for employment and contracting opportunities;</li> <li>that youth access to education and employment is a priority including that previous resource development projects have encouraged younger generations to graduate and advance careers;</li> <li>that limited employment opportunities currently exist (including job advancement) for Indigenous communities and its residents; and</li> <li>the importance of the traditional economy to communities and its residents.</li> </ul>	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p> <p>Métis Nation Saskatchewan</p>
	Assessment	13.3.2	<p>Indigenous Knowledge confirmed and verified information for the assessment of Economy, including:</p> <ul style="list-style-type: none"> <li>the importance of the traditional economy to the economic well-being of community members;</li> <li>the positive impacts resource development has brought in terms of training and employment to Indigenous communities (including through Des Nedhe and PBN Construction);</li> <li>that employment opportunities have encouraged younger generations to graduate and advance careers; and</li> <li>that consensus exists among community members that the Project will benefit the community through</li> </ul>	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p> <p>Métis Nation Saskatchewan</p>

Discipline	Aspect Influenced	Section(s)	How Indigenous Knowledge was Incorporated	Source of Indigenous Knowledge (Community)
			employment opportunities and local community owned business and contracting opportunities.	
	Mitigation	13.4	<p>Indigenous Knowledge informed mitigation and enhancement measures for Economy, including:</p> <ul style="list-style-type: none"> <li>the need for agreements with Indigenous communities to reflect community interests and objectives relative to Project opportunities;</li> <li>workforce development plans to prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities and hiring practices during all phases of the Project; and</li> <li>the establishment of a procurement approach prioritizing businesses within LSA communities throughout all phases of the Project.</li> </ul>	<p>(Informed through existing environment and assessment)</p> <p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p>
Accidents and Malfunctions	Assessment	14.4, 14.6.7	Incorporated traffic related accident scenario along the transportation route at cultural camp locations identified in IK.	<p>English River First Nation</p> <p>Kineepik Métis Local #9 and Northern Village of Pinehouse</p>

## 3 Summary of Issues Raised

### 3.1 English River First Nation

Key issues and concerns from ERFN identified through engagement focused on economic opportunities, education and training, business interactions, meaningful participation of Elders, IK, cabin purchases by non-ERFN members in ERFN territory, Furblock amalgamation, ISR mining, restricted access to land users, radiation, effects to wildlife, integrity of aquatic environments, surface disturbances, waste products, climate change, and restoring the environment. Denison responded to the concerns as shown in **Appendix C-1**.

In addition, during the pre-review process, ERFN also identified concerns regarding the level of detail provided regarding mitigation, baseline conditions, and predictions regarding the effects of the Project in the sections of the EIS they reviewed, the temporal and spatial baseline scope of the EIS, and how some ERFN citizens' perception of the potential effects of the Project may influence their actions. Denison responded to these items in a letter.

Denison's approach to economic opportunities, including regarding employment, training and business participation is discussed in **Section 13** of the EIS. To date, Denison has integrated ERFN businesses and employees into its exploration and pre-mining activities. For example, Denison has entered into contracts to make Tron Construction & Mining Limited Partnership (an ERFN-owned business) the general contractor responsible for the mechanical, piping, electrical, and instrumentation for Denison's Feasibility Field Test, resulting in significant expenditures with this company. As outlined in the IPP, Denison recognizes the important role of Canadian business in the reconciliation process. Denison is committed to sharing the economic benefits of Denison's business activities and providing equitable access to jobs and training to ERFN Members.

Denison has incorporated the Indigenous and Local Knowledge that it has received from ERFN, including from ERFN Elders, into the relevant sections of the EIS as appropriate as outlined in **Section 3** of the EIS. Consideration of the effects of the Project to ERFN was based on a report prepared by ERFN regarding ERFN's traditional knowledge of and land use/occupancy in and around the Project. The EIS reflects the level of detail that was provided and includes all information received from ERFN. Any gaps which remain are a result of a lack of information on those topics.

Denison is committed to ongoing engagement with Indigenous communities and organizations throughout the entire Project lifespan. As requested by ERFN, Denison expanded the spatial boundaries of the LSA. More information regarding ISR mining, the Project's water usage, and the treatment of waste is available in **Section 2** of the EIS. Additionally, further information relating to mitigation, baseline conditions, and predictions are available throughout the entire EIS. As the EA process continues, Denison anticipates that more information will be gathered regarding the actual effects of the Project, which will be used to develop appropriate mitigation measures with input from ERFN.

Comments on the draft EIS from ERFN were submitted to the CNSC on March 3, 2023. Noted as sources of concern in ERFN submission include topics often centered around; groundwater in terms of decommissioning and risks; wastewater treatment in terms of aquatic life; risks in terms of freeze wall containment and associated emergency response procedures; and the manner in which ERFN's *Traditional Knowledge Study and Health and Socio-Economic Study Report* was incorporated into the EIS.



Denison has responded to ERFN's comments on the draft EIS. See **Appendix C-1** for a comprehensive overview of comments and responses.

On September 27, 2023, ERFN provided a letter to the CNSC and the Province of Saskatchewan a letter that outlined ERFN's consent for the Project, subject to Denison materially fulfilling its commitments to ERFN. The letter further noted ERFN's intent to participate in the ongoing regulatory approval processes for the Project in a manner consistent with agreement between the two parties.

## 3.2 Kineepik Métis Local #9

Key issues and concerns from Kineepik Métis Local #9 focused on economic opportunities associated with the Project, pre-existing Indigenous and Local Knowledge, and questions regarding ISR mining. Denison responded to the questions as shown above, in **Appendix C-2**. Owing to the nature of the joint processes undertaken between Denison, the Northern Village of Pinehouse Lake and Kineepik Métis Local #9 up until late-2019, additional information on key issues and concerns raised from the Northern Village of Pinehouse Lake have also been included.

As outlined in the IPP, Denison recognizes the important role of Canadian business in the reconciliation process. Denison is committed to sharing the economic benefits of Denison's business activities with KML. Denison has incorporated the Indigenous and Local Knowledge that it has received from KML into the relevant sections of the EIS as appropriate. Denison is committed to ongoing engagement with Indigenous communities throughout the entire Project lifespan. More information regarding ISR mining and alternatives that were considered is available in **Section 2** of the EIS. Denison anticipates that more information will be gathered regarding the Project's proposed operations, which will be shared with KML.

Comments on the draft EIS from KML were submitted to the CNSC on February 17, 2023. Noted as sources of concern in KML's submission include topics centered around road improvements and local capacity for emergency response. KML's comments additionally expressed interest in local capacity building to support local participation in industry in terms of employment and business/contract opportunities. See **Appendix C-2** for a comprehensive overview of comments and responses. On December 5, 2023, KML confirmed to Denison that Denison's responses to the February 17, 2023, public comments had resolved KML's comments / concerns on the draft EIS and the Project.

## 3.3 Sipishik Métis Local #37

Key issues and concerns from Sipishik Métis Local #37 focused on concerns with racism affecting employees, how IK and local history are integrated in the EIS, questions on ISR mining, and environmental monitoring. Denison responded to the questions as shown in **Appendix C-3**. Owing to the nature of the joint processes undertaken between Denison, the Northern Village of Beauval Lake and Sipishik Métis Local #37 up until late-2019, additional information on key issues and concerns raised from the Northern Village of Beauval have also been included.

Denison believes in providing and maintaining a work environment free from workplace violence, harassment, sexual harassment and discrimination. To that end Denison has introduced several policies to ensure that workers are supported, including a Workplace Violence & Harassment Policy and a Whistleblower Policy. Specific information regarding how engagement activities and Indigenous and local knowledge have influenced the assessment process is available in the EIS. Denison is committed to ongoing engagement with Indigenous communities and organizations throughout the entire Project lifespan. More information regarding ISR mining and alternatives that were considered is available in

**Section 2** of the EIS. Denison anticipates that more information will be gathered regarding the Project's proposed operations, which will be shared with Sipishik Métis Local #37.

Métis Nation – Saskatchewan holds the Duty to Consult for Sipishik Métis Local #37. See Section 3.11, below, for summarized areas of concern identified by MN-S.

### 3.4 Patuanak Métis Local #82

Key issues and concerns from PML were in relation to technical questions associated with the ISR mining method, including treatment of wastewater, malfunctions, and relationship development with Denison. Denison responded to the questions as summarized in **Appendix C-4**.

More information regarding the technical details of ISR mining, including the Project's treatment of water, is available in **Section 2** of the EIS. Throughout the EA process, Denison anticipates that more information will be gathered regarding the Project's proposed operations, which will be shared with PML.

Métis Nation – Saskatchewan holds the Duty to Consult for Patuanak Métis Local #82. See Section 3.1.1, below, for summarized areas of concern identified by MN-S.

### 3.5 Fond du Lac First Nation, Black Lake First Nation and Hatchet Lake First Nation

On March 18, 2019, YNLR sent a letter to Denison directing that they would undertake engagement and communication for the Fond du Lac First Nation, Black Lake First Nation and Hatchet Lake First Nation. Please see **Section 3.12**, below, for a full discussion of the issues identified by YNLR.

### 3.6 Birch Narrows Dene Nation

Key issues and concerns from Birch Narrows Dene Nation focused on IK, land and resource use, business opportunities, socioeconomic effects, engagement, training and employment opportunities, business opportunities, cumulative effects, land and resource use, effects to wildlife, and aquatic environments. Denison responded to the questions as shown in **Appendix C-5**.

Specific information regarding how engagement activities and Indigenous and local knowledge have influenced the assessment process is available in the EIS. Denison is committed to ongoing engagement with Indigenous communities and organizations throughout the entire Project lifespan. Denison is committed to sharing the economic benefits of Denison's business activities with Indigenous people and communities. Denison provides further details regarding the potential effects of the Project to water quality, fish and fish habitat, and wildlife and wildlife habitat in **Section 8** and **Section 9** of the EIS.

Comments on the draft EIS from BNDN were submitted to the CNSC on February 28, 2023. Noted as sources of concern in BNDN's submission include topics centered around; Indigenous Knowledge, land use, and cultural heritage; socioeconomics; water resources; aquatic life; wildlife and terrestrial ecology; the atmospheric environment; and mining infrastructure and engineering. See **Appendix C-5** for a comprehensive overview of comments and responses.

On March 3, 2025, BNDN sent a letter to Denison rescinding its previous position. BNDN articulated its 78 outstanding concerns in respect of the Project in May 2025, noting some issues had been adequately addressed by Denison, and others issues remained unaddressed.

In May and July 2025, Denison sent letters to BNDN in respect of its correspondence from March and May, 2025. In this correspondence, Denison reiterated its interest in setting up a meeting to further discuss with BNDN to which BNDN did not respond to. Denison has committed to providing BNDN additional information in respect of their May 2025 correspondence.

### 3.7 Buffalo River Dene Nation

As of July 2024, Denison has not received any engagement from BRDN to Denison expressing interests, issues, or concern.

### 3.8 Lac La Ronge Indian Band

Key issues and concerns that arose in engagement with the LLRIB focused on construction timing, employment opportunities, protection of the environment, information about the ISR mining method, waste products, transportation of yellowcake, and whether an EA was being undertaken. Denison responded to the questions as shown in **Appendix C-6**

More information regarding ISR mining is provided in **Section 2** of the EIS, including a discussion of how the Project will address operating mine waste. Throughout the EA process, it is anticipated that more information will be gathered regarding the Project's proposed operations, which will be shared. As outlined in the IPP, Denison recognizes the important role of Canadian business in the reconciliation process. Denison is committed to sharing the economic benefits of Denison's business activities with Indigenous people and communities.

Comments on the draft EIS from LLRIB were submitted to the CNSC on February 9, 2023. Noted as sources of concern in LLRIB submission include potential adverse impacts to the ability to hunt, fish, and trap for food and/or carry out traditional uses including cultural, spiritual or other important sites near the proposed project area. Further comments raised throughout engagement with LLRIB were in relation to LLRIB's interest in entering into a contractual agreement with Denison. Denison has provided responses to LLRIB in respect of the further comments and is committed to continuing engagement activities with LLRIB in respect of the Project.

See **Appendix C-6** for a comprehensive overview of comments and responses.

### 3.9 A La Baie Métis Local #21

Denison engaged directly with ALBML from 2016 to 2019. In 2019, ALBML delegated their Duty to Consult for the Project to the MN-S. As a result, MN-S has represented ALBML regarding engagement with Denison for the Project. Please see **Section 3.11**, below, for a full discussion of issues identified by MN-S.

### 3.10 Dore/Sled Lake Métis Local #67

In 2019, Denison was notified by the MN-S that Dore/Sled Lake Métis Local #67 had delegated their Duty to Consult for the Project to the MN-S. As a result, MN-S has represented Dore/Sled Lake Métis Local #67 regarding engagement with Denison for the Project. Please see **Section 3.11**, below, for a full discussion of issues identified by MN-S.

### 3.11 Métis Nation – Saskatchewan

Key issues and concerns from MN-S focused on employment opportunities, racism, community investment, engagement, IK, land claims, ISR mining, radiation, and waste. Denison responded to the questions as shown in **Appendix C-9**.

As outlined in the IPP, Denison recognizes the important role of Canadian business in the reconciliation process. Denison is committed to sharing the economic benefits of Denison's business activities with Métis people and communities. Denison believes in providing and maintaining a work environment free from workplace violence, harassment, sexual harassment and discrimination. To that end Denison has introduced several policies to ensure that workers are supported, including a Workplace Violence & Harassment Policy and a Whistleblower Policy. Specific information regarding how engagement activities and Indigenous and local knowledge have influenced the assessment process is available in the EIS. Denison is committed to ongoing engagement with Indigenous communities and organizations throughout the entire Project lifespan. More information regarding ISR mining and alternatives that were considered is available in **Section 2** of the EIS, including a discussion of how the Project addresses wastewater.

Since being advised by the MN-S in October 2019 that a number of Métis Locals had delegated to the MN-S the Duty to Consult for the Project, Denison has been engaged in extensive ongoing discussions with the MN-S with the goal of reaching agreement regarding the EA process and MN-S' participation in it. In recognition of the MN-S' potential interests in the Project, the parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings.

A capacity funding agreement was signed relative to the above process with the MN-S in October 2022. As part of this agreement, Denison agreed to fully fund a Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023, and has integrated relevant information from the Study into the EIS. For more information about the Métis Knowledge Study, please see Section 3 of the EIS.

Comments on the draft EIS from MN-S were submitted to the CNSC on March 3, 2023. Noted as sources of concern in MN-S's submission include topics centered around; engagement with the MN-S; consideration of Métis land use and Métis knowledge; economics; environmental monitoring and management programs; and mitigation. See **Appendix C-9** for a comprehensive overview of comments and responses.

MN-S indicated five primary outstanding concern centred around: (i) stigma, potential contamination, and residual impact, (ii) basement rock permeability, (iii) adverse effects to Métis land claims, (iv) adverse effects on animals, lands, and waters, and (v) involvement and collaboration in monitoring. Denison and the MN-S have exchanged information between each other in respect of these outstanding issues and Denison is committed to continuing engagement activities with MN-S in respect of the Project.

### 3.12 Ya'thi Néné Lands and Resources Office

Key issues and concerns from YNLR focused on IK, agreements, procurement, employment and training, ISR mining, radiation, and water quality. Denison responded to the questions as shown, above, in **Appendix C-10**.

Specific information regarding how engagement activities and Indigenous and local knowledge have influenced the assessment process is available in the EIS. Denison is committed to ongoing engagement with YNLR throughout the entire Project lifespan. Denison has incorporated the Traditional Knowledge it has received from YNLR into the relevant sections of the EIS as appropriate. More information regarding ISR mining and alternatives considered by Denison is available in **Section 2** of the EIS, including a discussion of wastewater. As outlined in the IPP, Denison recognizes the important role of Canadian business in the reconciliation process. Denison is committed to sharing the economic benefits of Denison's business activities with Indigenous people and communities.

In addition, during the pre-review process, YNLR also identified concerns regarding how Denison described TK information provided by YNLR in the EIS, along with the classification of Hatchet Lake First Nation as an Indigenous Community rather than an Indigenous Community of Interest in the EIS.

Denison has made changes to the EIS to clarify the description of TK information provided by YNLR and updated the classification of Hatchet Lake First Nation.

Comments on the draft EIS from YNLR were submitted to the CNSC on March 3, 2023. Noted as sources of concern in the YNLR submission include topics centered around; Indigenous COI designation; woodland caribou and cumulative effects; the aquatic environment, and; involvement of the YNLR into the development of monitoring programs and plans. See **Appendix C-10** for a comprehensive overview of comments and responses.

Denison has provided responses to YNLR in respect of remaining issues and concerns and has been advised by YNLR that a number of their public comments were resolved and that the YNLR were optimistic that the process undertaken throughout the engagement process would resolve outstanding issues and concerns by the conclusion of the regulatory process.

### **3.13 Peter Ballantyne Cree Nation**

Key issues and concerns from PBCN focused on aquatic and terrestrial environments including potential impacts to woodland caribou, accidents and malfunctions, area access, water use, potential socioeconomic impacts, employment and business opportunities, and PBCN participation. Denison responded to the questions as shown in **Appendix C-8**.

Comments on the draft EIS from PBCN were submitted to the CNSC on March 3, 2023. PBCN's comments outline sources of concern as identified above.

In July and August, 2025, Denison and PBCN collaborated to develop a process and deliverable that would address PBCN's broad issues and concerns in relation to protection of water quality in their traditional territory, access to monitoring data, and participation in environmental monitoring initiatives, which were the key areas of interest identified by PBCN in respect of the Project.

Denison is committed to continuing engagement with PBCN about the Project in respect of their interests in the Project.

### **3.14 Meadow Lake Tribal Council and Prince Albert Grand Council**

Comments on the draft EIS from PAGC were submitted to the CNSC on March 5, 2023. PAGC's comments outline sources of concern focused on consideration and incorporation of Indigenous perspectives and Indigenous Knowledge throughout the EIS in terms of the terrestrial environment, particularly in relation to caribou. PAGC identified traffic and noise from the proposed Project are a concern in terms of caribou,

and additionally highlighted a general consideration of socio-economic factors, human health, ecosystems, and sustainability. Denison responded to the PAGC's public comments on the draft EIS as shown in **Appendix C-11**.

## 4 Future Indigenous Engagement Activities

Denison believes that the development of positive and effective working relationships with interested parties will not conclude with the completion of the assessment and licensing process. Denison believes that there is considerable value in sustaining opportunities for engagement with Indigenous communities and organizations and is committed to ongoing engagement throughout the entire Project lifespan.

The adoption of the IPP in 2021, the commitment to take action towards advancing reconciliation with Indigenous peoples in Canada and the identified action plan focus areas of engagement, empowerment, environment, employment and education, reflect a commitment to implementation of the continuously evolving Reconciliation Action Plan. Ongoing and meaningful engagement is one of the foundational action areas that Denison is committed to interweave the principles of reconciliation throughout all areas of the company's operations.

Just as the Project engagement process has evolved to date, specific activities will be identified in discussion with Indigenous Interested Parties to seek alignment on the topics or areas of concern or interest. This may include some of the following:

- Follow-up to specific feedback received on the EIS and identified areas of concern or questions
- Monitoring (environment or other)
- Licensing or permitting activities
- Other topics as identified

For each Indigenous Community of Interest, Other Indigenous Community, or Indigenous Organization, future engagement activities are described in those relevant sections.



## 5 Proposed Reporting Schedule

Denison will submit any material change updates on the IER to the CNSC.

Denison proposes to submit revised Indigenous Engagement Reports to the CNSC at the following regulatory milestones:

- Submissions in support of the final stages of the approval for the Environmental Assessment of the Project;
- Submission of licence application to prepare site and construct;
- Submission of licence application to operate;
- Submission of any amendments to the licence to operate;
- Submission of licence application to decommission; and
- Submission of application to be released from licence.

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## 7 Appendix A

### Appendix A-1: Key Engagement with English River First Nation

Date/Method	Summary
<b>2016</b>	
Jul. 7, 2016 Meeting	Denison introduced their leadership team to leadership of ERFN and requested permission to visit the community and provide an introductory presentation to the community.
Jul. 27, 2016 Community Meeting	Following a community meal, an introductory presentation on Denison Mines, the company, and the Project was shared.
Nov. 17, 2016 Youth Job Fair	Denison staff hosted a booth at the ERFN job fair, providing advice to high school students on the career opportunities in the mining and exploration industries.
Nov. 30, 2016 Meeting	Meeting discussions focused on the upcoming schedule of the Project as well as the best way of obtaining and incorporating ERFN Traditional Knowledge (TK) into the Project's environmental baseline data collection.
<b>2017</b>	
Jan. 26, 2017 Meeting	Inquiry related to employment / training and / or contract service opportunity related to economic opportunities.
Mar. 3, 2017 Meeting	Met with the Lands and Resource Manager to obtain and discuss ERFN TK map of their Traditional Territory.
Jul. 24, 2017 Email	Interaction related to employment / training and / or contract service opportunity related to economic opportunities
Aug. 30, 2017 Meeting	Denison and the Chief of ERFN met and an update on the Project was provided by Denison. Also discussed was the interest in a formal MOU regarding working together in the future.
<b>2018</b>	
May 3, 2018 Workshop	Denison met with the Chief of ERFN and ERFN members in Patuanak to provide a Project update. A workshop was completed with participants at the meeting to help identify alternatives to (1) the most effective mine access route from the existing public highway to the Project, (2) the pros and/or cons with respect to which lake would be the most appropriate lake to select in terms of discharging treated effluent once the mine was operational and (3) the pros and/or cons the community saw with respect to the mining methods under evaluation at the time.
<b>2019</b>	
Jan. 31, 2019 Meeting	Denison and ERFN (Lands and Resources Office, Elder) met regarding the finalization of the Project Description for submission to the CNSC and Province of SK to initiate the EA of the Project; an overview of the details of the EA submission, along with general discussion regarding how Denison can support ERFN through the EA process.

Date/Method	Summary
Feb. 1, 2019 MOU Agreement	Denison and ERFN entered into a MOU regarding the Project. The MOU outlined areas of community interest that would be discussed and provided process support for participation.
May 23, 2019 Meeting	Denison staff met with the ERFN Lands and Resources Officer regarding the Project. Discussed in detail was that the Project is occurring in ERFN Traditional Territory. A follow up email was sent by Denison outlining the next key steps for the EA process, namely the Public Review period and the development of the EIS.
Jun. 5, 2019 Letter/Email	During the CNSC Public Review period for the Technical Proposal and Project Description for the Project, Denison sent a letter to ERFN advising them about the Public Review period and offering them the opportunity to raise any questions or concerns to Denison staff and / or the regulators
Jun. 17, 2019 Meeting (Chief)	Denison and the Chief of ERFN met to discuss the status of the Project Description; land use activities by ERFN members and other First Nations.
Jun. 2, 2019 Email	Denison connected with the ERFN Lands and Resources Officer to begin planning for community meetings in November 2019. Proposed dates by Denison were eventually confirmed by ERFN.
Jul. 30, 2019 Drop-in Meeting (Chief)	Denison and the Chief of ERFN met to discuss an update of the Project; and discuss general items of interest (i.e., ERFN family and wellness initiatives, and access to the Wheeler River camp).
Aug. 1, 2019 Drop In Visit (Elder)	While in Patuanak, Denison staff met with an ERFN Elder, during which particulars about the Project were discussed, including discussion about the traditional territory of ERFN.
Aug. 23, 2019 Site Visit (Group)	Denison hosts the MN-S President, MN-S Minister of Environment/MN-S Region 3 President, and the Presidents of the Métis Locals at the Project site for a site tour and to discuss the Project. Representatives from the Canadian Nuclear Safety Commission and the Province of Saskatchewan, Ministry of Environment were also in attendance.  Participants included: A La Baie Métis Local #21, Canadian Nuclear Safety Commission, ERFN, KML, Métis Nation - Saskatchewan, Métis Nation - Saskatchewan - Region 3, Patuanak Métis Local #82, SK MOE, Village of Beauval, Village of Île-à-la-Crosse, Village of Pinehouse Lake, Denison Mines
Aug. 28, 2019 Site Visit (ERFN Chief & Council)	Denison provided a site tour of the Project to the Chief of ERFN, along with three ERFN Councillors. Also on the tour was the local ERFN land user who resided near to the Project site location (this local ERFN land user passed away in April 2021).
Sep. 12, 2019 Email	Denison sent an email to the Lands and Resources Manager for the ERFN regarding the planning for the November community workshops. An email response was received by Denison indicating the workshop and timing as proposed by Denison were acceptable.
Oct. 15, 2019 Letter	Denison sent formal correspondence to the leadership of ERFN providing an update from the summer activities associated with the Project, and confirmation of the details regarding the forthcoming planned community interactive workshop.



Date/Method	Summary
Oct. 28, 2019 Email	Denison contacted the ERFN Lands and Resources officer to provide notice that, due to the almost complete change in leadership within ERFN, Denison was postponing the planned community workshops in November.
Nov. 4, 2019 Letter	Following the election of a new Chief to ERFN, Denison sent a letter providing a high-level overview of Denison and the Project and an offer to meet the Denison team in the coming weeks.
Nov. 21, 2019 Meeting	Denison met with the new ERFN Councillors to provide an overview of the Project and to get their early feedback. Also discussed were Denison's exploration activities generally occurring in ERFN's traditional territory.
Nov. 23, 2019 Email	As a follow up to the meeting earlier in the week with ERFN, Denison contacted the Vice-Chief of ERFN regarding the appropriate contact within the Nation for engagement activities / work regarding the Environmental Impact Statement. The Vice Chief responded that in the interim, it would be her.
Dec. 6, 2019 Letter	As part of the information-sharing process by Denison with Interested Parties regarding opportunities associated with the Project, Denison provided the ERFN with a procurement forecast for 2020.
Dec. 18, 2019	Following a presentation at Saskatchewan event, Denison was contacted by an English River First Nation member regarding further information about the Wheeler River Project. Denison provided the information to the individual. The ERFN member was on the Denison summer site tour of 2019.
Dec. 2019 Emails	Denison provided information to an ERFN member who was on the earlier site tour. Denison provided a copy of an earlier presentation to an ERFN technical advisor.
<b>2020</b>	
Mar./Apr. 2020 Emails	Denison provided, and ERFN responded to the postponement of the planned community workshops due to the COVID-19 virus; and the temporary suspension of the EA. Denison secured PPE and other items for a number of communities in northern Saskatchewan, including the ERFN.
May/Jun. 2020 Emails	Emails concerning an upcoming meeting confirmation and the proposed agenda.
Jul. 2020 Emails	Discussions with a Councillor ERFN regarding upcoming field work and COVID-19 protection standards; and with ERFN for feedback on ongoing process discussions.
Aug. 12, 2020 Meeting	Discussions with ERFN on advancing process discussions.
Aug. 19, 2020 Meeting	Denison met with ERFN to discuss ERFN's interest and potential involvement in the development of components of the EIS.
Aug. 27&28, 2020 Meetings	Discussions between Denison and ERFN regarding upcoming events happening within ERFN (Culture camp).
Sep.&Dec. 2020 Emails	Ongoing process discussions between Denison and ERFN regarding the Project.

Date/Method	Summary
<b>2021</b>	
Mar. 31, 2021 Press Release	Denison and ERFN formally announced, by Press Release, that they had entered into a Participation and Funding Agreement to support the ERFN's participation in the EA process.
Mar. 31, 2021 Meeting (Chief and Council)	Denison hosted a meeting for the ERFN Chief and Council to provide them an update on the Project, to discuss the virtual meeting being held for ERFN members later in the evening and provided an overview of the VCs being assessed for the Project, with a request to provide feedback on the VCs using the online survey tool.
Mar. 31, 2021 Virtual Meeting	Denison hosted a virtual meeting for ERFN (Patuanak, La Plonge, and Urban Members). Included in the discussion was an overview on the VCs for the Project, with a request to provide feedback to Denison via an online survey with specific questions pertaining to VCs.
Apr. 9, 2021 Survey	As part of engagement activities for ERFN, Denison prepared and shared an online survey which included information about Denison, the Project and posed validation questions about the VCs being assessed as part of the EA process. A total of 23 responses were received. The information related to the VCs was incorporated into the assessment and questions asked on the surveys was incorporated into the overall engagement database.
Apr. 22, 2021 Advisory Committee Meeting	ERFN and Denison held a Nuhtsiye-kwi Benéne (Ancestral Lands Committee) meeting. Topics discussed were visioning for the Committee, an overview of the Project, the 2021 geotechnical permitting program, and planning for the next meeting.
May 28, 2021 Email	As per the agreed-upon process for review and information-sharing regarding the Project EIS, Denison provided ERFN with the draft Table of Contents and the planned approach to Cumulative Effects.
May 28, 2021 Agreement	Denison and ERFN finalized an agreed-upon approach between the parties regarding ERFN's formal participation in the development of supporting information for the Project EIS, along with agreed-upon advance information-sharing processes.
Jun. 15, 2021 Advisory Committee Meeting	Denison and the Nuhtsiye-kwi Benéne Committee (Ancestral Lands Committee) of ERFN held a meeting. During the meeting topics discussed were concluding discussions related to the geotechnical permit for the Project for 2021, site access considerations (related to ERFN usage of the Fox Lake road), a report on a subsidence assessment report undertaken by Denison and requested by ERFN, and an overview of a pilot project being undertaken by Denison related to reclamation of linear features in and around the Project area.
June 18, 2021 Email	As per the agreed-upon process for review and information-sharing regarding the Project EIS, Denison provided ERFN with the draft community baseline socioeconomic profile for ERFN (Patuanak, La Plonge, and Urban Members).
Jun. 22, 2021 Report	Denison followed up with ERFN, providing a community-specific report pertaining to the March 2021 Denison Wheeler River Engagement Activities which provided an overview of Project Components and the VCs selected for the EA.
Jun. 22 and 28, 2021 Email	As per the agreed-upon process for review and information-sharing regarding the Project EIS, Denison provided ERFN with comments on their proposed socioeconomic and wellness interview questions for the forthcoming study; and with shapefiles for the Project.

Date/Method	Summary
Jun. 30, 2021 Meeting	Denison, its third-party consultants for socioeconomic and health and wellness assessment (Intergroup), the ERFN Lands & Resources Officer, and ERFN's third party consultant (Shared Value Solutions) had a meeting where Denison provided an overview of the Project scope, and Intergroup provided an overview of the approach taken for the socioeconomic and wellness assessment for the EA. ERFN provided comments back to Denison on the proposed methodology for the socio-economic assessment
Jul. 29, 2021 Email	
Jul. 4, 2021 Email	As per the agreed-upon process for review and information-sharing regarding the Project EIS, Denison provided ERFN with requested Community Vitality and Monitoring Partnerships Reports relevant to their areas of research regarding socioeconomic health and wellness.
Jul. 12, 2021 Email	As per the agreed-upon process for review and information-sharing regarding the Project EIS, ERFN provided Denison with advanced review comments on the proposed Table of Contents and concordance, as well as on the proposed methodology for cumulative effects for the Project.
Jul. 26, 2021 Email	As per the agreed-upon process for review and information-sharing regarding the Project EIS, Denison provided the ERFN with the assumptions for the traditional food diet based on ERFN (for the human health risk assessment).
Jul. 29, 2021 Email	As per the agreed-upon process for review and information-sharing regarding the Wheeler River Project environmental impact statement, English River First Nation provided comments to Denison on the proposed methodology for the socioeconomic assessment.
Aug. 25, 2021 Email	Denison outlined a proposed approach with ERFN in response to the feedback provided to Denison from the previous two months on elements of information to be considered for the Project EA.
Oct. 14, 2021 Virtual Meeting	Denison met with ERFN Chief and Council, along with members of the Nuhtsiye-kwi Benéne Committee to provide an overview of the 2022 Exploration Activities, report from the ERFN Environment & Cultural Monitor, an overview of the 2021 and planned 2022 activities for the Project, and information related to heritage management planning for the Project.
Nov. 19, 2021 Phone Call	Denison staff member and an ERFN Member connected regarding recommendations for effective engagement activities with ERFN members, which included the necessity for translations.
<b>2022</b>	
May 30&31, 2022 Open House	In collaboration with the Chief and Council of English River First Nation, Denison hosted an open house event at ERFN Patuanak Reserve, sharing information about the Wheeler River Project, the preliminary effects assessment of the Project, and proposed mitigation and monitoring. Denison advertised the event on the local radio, with posters around the community, on the local cable network, and through social media. Denison had a Dene translator available for attendees. Residents of the Hamlet of Patuanak were also advised about the open house and invited to attend. 31 attendees signed the sign in sheet. Information boards and area models were displayed, and staff Denison staff were available to answer questions. A survey was available for community members to complete, and remaining available online for 2 weeks following the open house.

Date/Method	Summary
2022 Draft EIS	As per the agreed-upon process for review and information-sharing regarding the Project EIS, Denison provided, and ERFN reviewed and responded to, Sections 3, 11, 12, 13, and 16 of the draft EIS, prior to filing.
<b>2023</b>	
Mar. 20, 2023 Meeting	Denison and English River First Nation had a meeting in which Denison updated ERFN on the Wheeler River Project in terms of the feasibility field test status and work complete, the environmental impact statement and next steps, licensing information and next steps.
Jun. 22, 2023 Site Visit	Denison hosted English River First Nation at the Wheeler River Project Site to provide an overview of the work done to date on the Project, including the 2022 and 2023 Feasibility Field Test in support of the Project. Twenty-five ERFN Members were in attendance. The site visit opened with the Wheeler River Project site being blessed by two Elders from the Nation.
Aug. 18, 2023 Memo	English River First Nation provided Denison with a summary and categorization of comments from draft EIS technical review by ERFN, with a request for Denison to respond to the summary of the issues.
Sep. 27, 2023 Letter	Following the signing of the Shared Prosperity Agreement, English River First Nation sent a letter confirming their consent for the Wheeler River Project, dated September 27, 2023, to the Canadian Nuclear Safety Commission and the Saskatchewan Ministry of Environment.
Nov. 1, 2023 Memo	Denison provided a technical memo to English River First Nation in response to English River First Nation's July 26, 2023, technical memo summarizing the main areas of concern in relation to the Wheeler River Project, from the original draft Environmental Impact Statement comments earlier on February 22, 2023.
Nov. 28, 2023 Letter	In response to Denison's technical memo regarding English River First Nation's main areas of concern, ERFN provided, and Denison confirmed receipt of ERFN's document summarizing their review of Denison's response. ERFN indicated that they are satisfied with the level of response provided at this stage of project planning.
Nov. 28, 2023 Email	Denison coordinated with English River First Nation about the possibility of hosting a workshop in which Denison would provide a comprehensive overview of licensing steps and processes. It was agreed this could occur in 2024.
Dec. 13, 2023 Meeting	As of the end of October 2023, English River First Nation held an election for Chief and Council. Due to this election, Denison was unable to hold in-person community meetings but hosted an introductory meeting of the new Chief and Council to introduce the Project and the status of the environmental assessment and licensing to date.
<b>2024</b>	
Mar. 15, 2024 Workshop	Denison hosted a workshop in Saskatoon with 22 members of English River First Nation, as well as ERFN's environmental advisor, and 6 Denison staff members in attendance. The workshop focus was to provide details associated with the environmental assessment outcomes and the relationship to licensing / approvals, and to facilitate discussion and receive feedback pertinent to these topics. Information was shared through presentation slides and information handouts.

Date/Method	Summary
Apr. 26, 2024 Email	Denison provided English River First Nation with the report prepared as an outcome of the workshop hosted the month prior.
May 01, 2024 Mail Out	Denison sent the Chief of ERFN a project update package that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene.
Nov. 01, 2024 Letter	Denison mailed to all interested parties' letters of notice to provide an update on the status of the Environmental Impacts statement per the provincial regulatory process.
Dec. 20, 2024 - Letter	English River First Nation provided the SkMOE confirmation of the Duty to Consult Record for Denison Mines Environmental Impact Statement for the Wheeler River Project and expressed support for the advancement of the Project.
<b>2025</b>	
Mar. 26, 2025 - Meeting	Denison met with members of English River First Nation and engagement about the local fish consumption rates used to assess potential impacts to the representative ERFN fisher/trapper receptor in the Wheeler River EIS environmental risk assessment. ERFN members confirmed that the rates included in the ERA were appropriate and a conservative representation of an ERFN adult fisher/trapper receptor.
Mar. 27, 2025 - Meeting	Denison held a meeting with English River First Nation leadership to provide an update on the Wheeler River Project and next steps.
Apr. 12, 2025 - Email	Denison provided English River First Nation with a summary of discussion points and next steps from the March 26, 2025 meeting.
Apr. 17, 2025 Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.
May. 01, 2025 - Email	Denison provided English River First Nation with meeting notes following a recent meeting focused on local fish consumption rates. ERFN confirmed that notes were an accurate representation of the information exchanged on local fish consumption rates.
May. 02, 2025 - Email	English River First Nation indicated that they agreed with Denison's summary of discussion points and next steps.
May. 05, 2025 - Email	Denison contacted English River First Nation to arrange open house meetings in La Plonge and Patuanak reserves, focused on the Wheeler River Project and next steps leading up to the licencing hearing with the Canadian Nuclear Safety Commission. These were subsequently deferred until after Q3, 2025 as a result of the wildfire conditions in northern SK.
May. 13, 2025 - Email	As an outcome of a meeting held previously between Denison and English River First Nation, Denison committed to following up with ERFN about the draft Caribou Management Plan and requested related feedback and information.

## Appendix A-2: Key Engagement with Kineepik Métis Local #9

Date/Method	Summary
<b>2016</b>	
Jan. 15, 2016 Emails / Meeting	Pinehouse and KML sent an email to Denison, providing an introduction and an interest in meeting. The email exchange continued over a series of weeks, culminating in a meeting between the parties.
Sep. 7, 2016 Community Meeting	Denison hosted a community meeting in Pinehouse Lake to introduce the company and the Project.
Nov. 29, 2016 Meeting	Denison, KML President / Mayor Pinehouse, and Pinehouse Business North met to discuss the proposed 2017 community engagement activities, the baseline collection program, and the next steps regarding integration of TK that had been previously collected by Pinehouse.
<b>2017</b>	
Jan. 13, 2017 Email	Inquiry related to employment / training and / or contract service opportunity related to economic opportunities.
Jul. 17, 2017 Email	Denison and the Village of Pinehouse exchanged emails regarding updates since the last meeting, including planning for a leadership and community meeting in the coming months.
Sep. 6, 2017 Meeting	Denison and the leaders of Pinehouse (KML, residents, Pinehouse Business North) met and an update on the Project was provided by Denison. Attendees discussed their interest in a formal MOU regarding working together in the future.
Nov. 6, 2017 Agreement	Denison, the Village of Pinehouse, and the KML entered into a MOU regarding the Project. The MOU outlined areas of community interest that would be discussed and provided process support for participation.
Nov. 15, 2017 Meeting	As a follow up to an earlier meeting in September, Denison and Pinehouse Leaders (residents, KML and Pinehouse Business North) met, during which Denison provided an updated regarding the status of the Project. Also discussed were Denison's interest in supporting the further collection of TLU mapping data.
<b>2018</b>	
Jan. 16, 2018 Workshop	As part of the engagement program for the Project, Denison organized a workshop in Pinehouse Lake for community and KML members to attend. The workshop gathered community and student input in relation to road alignment options, treated effluent discharge locations, and mining methods.
Jan. 31, 2018 Email	Denison agreed to work together with KML regarding funding and supporting further work regarding TLU mapping.
Apr. 18, 2018 Agreement	Denison, the northern Village of Pinehouse Lake, and KML entered into an Addendum Agreement that funded the northern Village of Pinehouse and KML to undertake land use and occupancy mapping, and in return, agreed to provide information to Denison in an agreed upon form for Denison's use in connection with the EA or other regulatory processes.
Oct. 30, 2018 Meeting	Denison met with Pinehouse to provide an update on the Project, in relation to the filing of the Pre-Feasibility Study and commencing the EA.



Date/Method	Summary
	Kineepik Métis Local #9 attended this meeting.
<b>2019</b>	
Feb. 1, 2019 Meeting	Denison and Pinehouse leaders (Village, KML, and Pinehouse Business North) held a meeting, in which Denison provided an update on the Project, including the pending submission of the Project into the EA process.
May 29, 2019 Phone Call	Denison and the President of KML had a phone call to discuss forthcoming meetings with Pinehouse Business North, the forthcoming Elders Gathering in Pinehouse, and general discussions on working together in the future.
Jun. 3, 2019 Email	Denison sent an email to the Mayor of Pinehouse / KML President to advise that the 30-day public review period had commenced on the Project Description and as such, if they had any questions or were seeking additional information, that Denison could assist.
Jun. 5, 2019 Letter	During the CNSC Public Review period for the Technical Proposal and Project Description for the Project, Denison sent a letter to KML advising them about the Public Review period and offering them the opportunity to raise any questions or concerns to Denison staff and / or the regulators, with a specific focus on the potential exercising of Indigenous and / or Treaty Rights within the Project area.
Jun. 6, 2019 Letter	Matter related to employment / training and / or contract service opportunity related to economic opportunities.
Aug. 23, 2019 Site Visit	Denison hosts the MN-S President, MN-S Minister of Environment/MN-S Region 3 President, and the Presidents of the Métis Locals at the Project site for a site tour and to discuss the Project, along with representatives from the CNSC and the Province of SK MOE. Participants: A La Baie Métis Local #21, CNSC, ERFN, KML, MN-S, MN-S- Region 3, Patuanak Métis Local #82, SK MOE, Northern Village of Beauval / SML #37, Northern Village of Île-à-la-Crosse, Northern Village of Pinehouse Lake, and Denison Mines.
Sep. 12, 2019 Email	Denison sent an email to the Mayor of Pinehouse and the Executive Director of KML to follow up a phone conversation regarding the proposed Denison Community Workshops for November 2019. The email contained the content for the proposed Workshop.
Nov. 5, 2019 Meeting	Denison, MN-S representatives, and the Métis Local Presidents meet to discuss process for engagement. Denison requested MN-S provide direction related to rescheduling the community workshops for January 2020. Kineepik Métis Local #9 was a participant.
<b>2020- November 2021: Kineepik Métis Local #9 engagement occurred through the MN-S</b>	
<b>2021</b>	
Nov. 15, 2021 Letter	Denison received correspondence from KML (Pinehouse Lake) advising Denison that they had notified the Aboriginal Consultation Branch of the Province of Saskatchewan and the Métis Nation - Saskatchewan on November 12, 2021 that it had formally revoked its previously delegated Duty to Consult to the Métis Nation - Saskatchewan. Denison's CEO had been in copy to the email sent regarding this matter on November 12, 2021. The correspondence requested that Denison engage directly with KML going forward and immediately.

Date/Method	Summary
Nov. 24, 2021 Email	The Environment, Education and Training Manager for KML sent Denison a question regarding production of uranium ore concentrate from the Phoenix deposit. Denison confirmed it would all be produced onsite, in a processing facility.
Nov. 24, 2021 Letter	Denison sent correspondence to the President of KML offering to develop a process between the parties that would facilitate the direct engagement of KML citizens with Denison for the Project, including a supportive capacity funding and participation process and related agreement negotiation process.
Dec. 7, 2021 Meeting	Denison and KML held a meeting to discuss the Project, activities undertaken in the past two years for the Project, and the status of the EA.
Dec. 21, 2021 Email	Denison and KML exchanged information related to the traditional territory boundaries for KML - confirming that the area in question was the KML traditional territory.
<b>2022</b>	
Apr. 29, 2022 Report	Kineepik Métis Local #9 provided Denison with their initial report on Valued Ecosystem Components, for consideration in Denison's Environmental Impact Statement. This was per the agreed-upon process set between KML and Denison regarding KML's participation in the environmental assessment process for the Wheeler River Project.
Jun. 1, 2022 Open House	In collaboration with Kineepik Métis Local and the Village Council of Pinehouse Lake, Denison hosted an open house event at the Village of Pinehouse Lake, sharing information about the Wheeler River Project, the preliminary effects assessment of the Project, and proposed mitigation and monitoring. Denison advertised the event on the local radio, with posters around the community, on the local cable network, and through social media. Denison had a Cree translator available for attendees. Information boards and area models were displayed, and staff Denison staff were available to answer questions. 52 attendees signed the sign in sheet. A survey was available for community members to complete, and remaining available online for 2 weeks following the open house.
Jun. 22, 2022 Press Release	Denison and KML formally announced, by Press Release, that they had entered into a Participation and Funding Agreement to support the KML's participation in the EA process.
Jun. 23, 2022 Report	Kineepik Métis Local #9 provided Denison with their Pre-EIS Report which considered Valued Ecosystem Components and predicted effects and mitigation measures, related to Denison's Environmental Impact Statement for the Wheeler River Project. This was part of the agreed-upon process developed between Denison and KML to ensure KML participated in the environmental assessment process for the Wheeler River Project.
<b>2023</b>	
Jun. 11, 2023 Email	After editing the table of issues, concerns and interests in response to the Federal Indigenous Review Team, Denison provided Kineepik Métis Local with a copy of the revised KML table of issues, concerns, and interested associated with the Wheeler River Project's Environmental Impact Statement. KML provided feedback and stated that they were satisfied with representation of interests, issues, concerns and Denison's responses to those.
Jun. 14, 2023 Site Visit	Denison hosted Kineepik Métis Local at the Wheeler River Project Site to provide an overview of the work done to date on the Project, including the 2022 and 2023 Feasibility Field Test in support of the Project. Twenty-one KML representatives were in attendance.

Date/Method	Summary
Oct. 6, 2023 Email	In response to Denison's letter informing Kineepik Métis Local of the upcoming engagement activities in Pinehouse, KML provided an update on their preparation for the said engagement activities.
Oct. 6, 2023 Email	Denison sent a letter to the Village of Pinehouse Lake / Kineepik Métis Local to provide information on the upcoming community engagement events, focused on the environmental assessment and licensing, set to occur as part of engagement activities for the Wheeler River Project.
Oct. 16, 2023 Email	At the request of Kineepik Métis Local, Denison provided a draft agenda to KML / Pinehouse in advance of the upcoming land user and community engagement meetings.
Oct. 17, 2023 Email	Kineepik Métis Local provided Denison with a finalized agenda for the upcoming land user engagement meeting and community engagement meeting.
Oct. 18, 2023 Email	Denison transmitted an image and requested that the Northern Village of Pinehouse / Kineepik Métis Local make a social media post on the community Facebook page to notify the community of Denison's upcoming open house meeting.
Oct. 18, 2023 Email	Denison transmitted posters to their trusted advisor in Pinehouse and requested that posters be hung in Pinehouse, Ile a la Crosse, and Beauval to notify community members of the upcoming open house meetings.
Oct. 24, 2023 Meeting	Denison hosted a meeting in the Northern Village of Pinehouse, for Kineepik Métis Local Land Users, to share information about the Wheeler River Project, with a particular focus on the flow of information from the environmental assessment into licensing, permits, and commitments. The event was planned and invites extended as part of the process in place by KML. Information boards and area models were displayed, information booklets were provided. Denison prepared a formal presentation, and a translator was present to translate as needed. The Canadian Nuclear Safety Commission and the Saskatchewan Ministry of Environment were invited by Denison and were in attendance.
Oct. 24, 2023 Open House	In coordination with Kineepik Métis Local, Denison hosted an open house event in the Northern Village of Pinehouse to share information about the Wheeler River Project, with a particular focus on the flow of information from the environmental assessment into licensing, permits, and commitments. Denison advertised the event with social media posts and posters around the community. In addition to members of the Kineepik Métis Local, 48 residents were recorded as in attendance. Information boards and area models were displayed, information booklets were provided. Denison prepared a formal presentation, and a translator was present to translate as needed. The Canadian Nuclear Safety Commission and the Saskatchewan Ministry of Environment were invited by Denison and were in attendance.
Nov. 22, 2023 Letter	Denison provided responses to Kineepik Métis Local's comments made on the draft Environmental Impact Statement for the Wheeler River Project.
Dec. 5, 2023 Email	Kineepik Métis Local confirmed to Denison that recent correspondence had resolved KML's comments/concerns on the draft EIS and the Wheeler River Project.
<b>2024</b>	

Date/Method	Summary
May 01, 2024 Mail Out	Denison sent the President of Kineepik Métis Local #9 a project update package that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene.
May 7, 2024 Site Visit (Student)	In coordination with Kineepik Métis Local, Denison Mines hosted a site tour at the Wheeler River Project for Pinehouse high school students.
May 8, 2024 Meeting (Land User)	In coordination with Kineepik Métis Local, Denison hosted a land user meeting at the Pinehouse Village Hall. The focus of the meeting was to share updates on the Wheeler River Project, to answer land user questions, to facilitate discussion, and to provide information on Project stage and licensing progression. The event was planned, and invitations extended as part of the process in place led by KML. Denison prepared a presentation and distributed informational handouts to attendees.
Nov. 01, 2024 Letter	Denison mailed to all interested parties' letters of notice to share the status of the Environmental Impacts statement per the provincial regulatory process.
Nov. 08, 2024 Email	Denison contacted Kineepik Métis Local to provide notification of the status of the EIS for the Wheeler River Project as part of the Federal and Provincial regulatory processes.
<b>2025</b>	
Feb. 20, 2025 Email	Denison informed Kineepik Métis Local #9 of application timelines for Participant Funding Program offered through the Canadian Nuclear Safety Commission.
Feb. 27, 2025 Email	Denison informed Kineepik Métis Local #9 of licencing hearing dates for the Wheeler River Project.
Apr. 17, 2025 Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.
May. 05, 2025 Email	Denison arranged an open house meeting with Kineepik Métis Local #9 and the Village of Pinehouse Lake, focused on the Wheeler River Project and next steps leading up to the licencing hearing with the Canadian Nuclear Safety Commission. These were subsequently deferred until after Q3, 2025 as a result of the wildfire conditions in northern SK.

## Appendix A-3: Key Engagement with Sipishik Métis Local 37

Date/Method	Summary
<b>2016</b>	
Dec. 6, 2016 Community Event	Denison participated in a community meeting for a local co-management board in the Northern Village of Beauval to introduce the company and explain the Project.  Participants: Aurora Communications Ltd, Individual - GP, MLA - Athabasca, Northwest Communities Management Company, Sipishik Métis Local #37, the Northern Village of Beauval, Denison Mines, and a Denison Contractor.
<b>2017</b>	
Sep. 6, 2017 Meeting	Denison and the leaders of the Northern Village of Beauval met and an update on the Project was provided by Denison. Attendees discussed their interest in a formal MOU regarding working together in the future.
<b>2018</b>	
Jan. 18, 2018 Workshop	As part of the engagement program for the Project, Denison organized a workshop in Northern Village of Beauval for community members to attend. The workshop gathered community input in relation to road alignment options, treated effluent discharge locations, and mining methods.
Jul. 30, 2018 Agreement	Denison, the Northern Village of Beauval and the Sipishik Métis Local #37 entered into a MOU regarding the Project. The MOU outlined areas of community interest that would be discussed and provided process support for participation.
<b>2019</b>	
Jun. 5, 2019 Letter	During the CNSC Public Review period for the Technical Proposal and Project Description for the Project, Denison sent a letter to Sipishik Métis Local #37 advising them about the Public Review period and offering them the opportunity to raise any questions or concerns to Denison staff and / or the regulators, with a specific focus on the potential exercising of Indigenous and / or Treaty Rights within the Project area.
Aug. 23, 2019 Site Visit	Denison hosts the MN-S President, MN-S Minister of Environment/MN-S Region 3 President, and the Presidents of the Métis Locals at the Project site for a site tour and to discuss the Project, along with representatives from the CNSC and the Province of SK MOE.  Participants: A La Baie Métis Local #21, CNSC, ERFN, KML, MN-S, MN-S- Region 3, Patuanak Métis Local #82, SK MOE, Northern Village of Beauval / SML #37, Northern Village of Île-à-la-Crosse, Northern Village of Pinehouse Lake, and Denison Mines.
Nov. 5, 2019 Meeting	Denison, MN-S representatives, and the Métis Local Presidents met to discuss process for engagement. Denison requested MN-S provide direction related to rescheduling the community workshops for January 2020. Sipishik Métis Local #37 was a participant.
<b>2020 – Present: Engagement with Sipishik Métis Local #37 occurred through the MN-S</b>	

## Appendix A-4: Key Engagement with Patuanak Métis Local #82

Date/Method	Summary
<b>2019</b>	
Jun. 3, 2019 Email	Denison sent an email to the Patuanak Métis Local President to advise that the 30-day public review period had commenced on the Project Description and as such, if they had any questions or were seeking additional information, that Denison could assist.
Jun. 5, 2019 Letter	During the CNSC Public Review period for the Technical Proposal and Project Description for the Project, Denison sent a letter to Patuanak Métis Local #82 advising them about the Public Review period and offering them the opportunity to raise any questions or concerns to Denison staff and / or the regulators, with a specific focus on the potential exercising of Indigenous and / or Treaty Rights within the Project area.
Aug. 23, 2019 Site Visit	Denison hosts the MN-S President, MN-S Minister of Environment/MN-S Region 3 President, and the Presidents of the Métis Locals at the Project site for a site tour and to discuss the Project, along with representatives from the CNSC and the Province of Saskatchewan, Ministry of Environment. Patuanak Métis Local #82 was a participant.
Sep. 18, 2019 Meeting	Denison met with the Patuanak Métis Local President and the Deputy Mayor of Patuanak, in Patuanak, to discuss Denison, and the Project. The meeting was introductory in nature and focussed on areas of the future for Patuanak to economically participate in the Project.
Nov. 5, 2019 Meeting	Denison, MN-S representatives, and the Métis Local Presidents meet to discuss process for engagement. Denison requested MN-S provide direction related to rescheduling the community workshops for January 2020. Patuanak Métis Local #82 was a participant.
<b>2020 – Present: Engagement with Patuanak Métis Local #82 occurred through the MN-S</b>	



## Appendix A-5: Key Engagement with Birch Narrows Dene Nation

Date/Method	Summary
<b>2019</b>	
Dec. 16, 2019 Letter	Denison sent the Chief of BNDN a letter providing information about the Project, which included reference to the importance of understanding potential effects on the undertaking of Indigenous and / or Treaty rights within the Project area.
<b>2020</b>	
Mar. 23, 2020 Letter	Correspondence to inform BNDN about the temporary suspension of the Project EA.
<b>2021</b>	
Jan. 20, 2021 Letter	Denison provided correspondence to inform the Village of BNDN about the Project EA Restart.
May 10, 2021 Email	BNDN provided correspondence to the CNSC regarding their interest in being consulted by the Crown and by Denison.
May 19, 2021 Letter	Denison responded to a letter from BNDN regarding their interest in being engaged about the Project. The letter outlined the previous times Denison had contacted BNDN and offered to meet with them regarding the Project.
<b>2022</b>	
Jun. 17, 2022 Email	Denison was contacted by Birch Narrows Dene Nation regarding their interest in learning more about the Wheeler River Project. Denison responded by providing a number of previous pieces of correspondence sent to BNDN in a follow up email, as requested by the individual.
Oct. 27, 2022 Letter	Birch Narrows Dene Nation provided a letter response to Denison regarding an offer to meet in relation to the Wheeler River Project, indicating their interest in meeting.
Nov. 8, 2022 Letter	Denison confirmed receipt of Birch Narrows Dene Nation's letter and provided a subsequent project update letter pertaining to the Wheeler River Project.
Nov. 16, 2022 Email	Denison suggested arranging a meeting time with Birch Narrows Dene Nation to provide a Wheeler River Project overview.
Nov. 16, 2022 Email	Birch Narrows Dene Nation confirmed receipt of Denison's letter response. BNDN requested meeting times be proposed.
Nov. 17, 2022 Email	Denison proposed meeting times to Birch Narrows Dene Nation to provide a Wheeler River Project overview.
Nov. 21, 2022 Email	Birch Narrows Dene Nation confirmed a date and time with Denison for a meeting for Denison to provide a Wheeler River Project overview.
Dec. 2, 2022 Email	Denison and Birch Narrows Dene Nation arranged a phone call in advance of their arranged Wheeler River Project overview meeting to discuss and confirm the agenda.
<b>2023</b>	

Date/Method	Summary
Jan. 6, 2023 Email	Birch Narrows Dene Nation suggested adjustments to the meeting date planned between them and Denison to overview the Wheeler River Project.
Jan. 26, 2023 Email	Following the postponing of several planned meetings, Denison emailed Birch Narrows Dene Nation to suggest dates for a meeting and presentation on the Wheeler River Project.
Feb. 14, 2023 Meeting	Denison Mines met with Birch Narrows Dene Nation, and their consultant team Tamarack, at the Saskatoon Inn and Conference Centre. In a presentation that provided an overview on the Wheeler River Project and Environmental Assessment, Denison outlined Project Components, Project Technologies, Project Schedule, Regulatory Process, and Valued Components. BNDN stated they had land use information in relation to the Wheeler River Project. Denison confirmed its interest in better understanding any information in relation to land use activities in and around the Wheeler River Project.
Feb. 14, 2023 Email	Following a meeting between Denison and Birch Narrows Dene Nation, Denison emailed BNDN with a copy of the presentation.
Feb. 22, 2023 Email	Following a meeting between Denison and Birch Narrows Dene Nation on the Wheeler River Project, Denison reached out to BNDN about the possibility of discussing a confidentiality agreement relative to traditional territory and land and occupancy information.
Apr. 5, 2023 Email	After the meeting and meeting follow ups between Denison and Birch Narrows Dene Nation, BNDN emailed to express support for establishing a confidentiality agreement for the purpose of sharing their land use data pertinent to the Wheeler River Project. BNDN additionally suggested a desire for Denison to fund a process to develop a Project Agreement and suggested meeting in the future.
Apr. 10, 2023 Email	Denison confirmed with Birch Narrows Dene Nation that Denison was preparing a confidentiality agreement and suggested dates for the next meeting with BNDN.
Apr. 18, 2023 Email	Denison emailed Birch Narrows Dene Nation to suggest a tentative date and time for their next meeting.
Apr. 25, 2023 Email	Denison emailed Birch Narrows Dene Nation to confirm the date of the next meeting and to provide BNDN with a Confidentiality Agreement.
May. 10, 2023 Meeting	In a virtual meeting between Denison and Birch Narrows Dene Nation and their consultants, Tamarack Consulting, Denison requested the land use information that BNDN suggested they had in relation to the Wheeler River Project. BNDN suggested that the information they could share would be limited owing to the fact that Denison was not providing funding in respect of the information.
May. 11, 2023 Email	At the direction of the Birch Narrows Dene Nation Development Inc. and the Chief of Birch Narrows, Denison emailed both Birch Narrows Dene Nation Development Inc., the economic development arm of Birch Narrows Dene Nation, and the Chief of BNDN, with summarized meeting notes and action items that captured most recent meeting. BNDN responded to confirm receipt of the notes.
Jun. 30, 2023 Letter	Denison provided a letter, via email, to Birch Narrows Dene Nation in response to BNDN's comments on Denison's Environmental Impact Statement for the Wheeler River Project. Denison indicated its willingness to meet to discuss and resolve BNDN's public comments on the Draft EIS.

Date/Method	Summary
Jul. 18, 2023 Email	Denison emailed both Birch Narrows Dene Nation Development Inc., the economic development arm of Birch Narrows Dene Nation, and the Chief of BNDN, the presentation slides and meeting notes from the previous meeting, held on May 10, 2023.
Jul. 31, 2023 Meeting	Denison CEO and Birch Narrows Dene Nation Chief met to discuss next steps and moving forward to resolve BNDN's concerns raised about the Project through the comment process. The Chief of BNDN recommended a course of action for Denison to take in respect of resolution of the draft EIS comments.
Nov. 29, 2023 Letter	Denison provided responses to the Birch Narrows Dene Nation's comments made on the draft Environmental Impact Statement for the Wheeler River Project.
<b>2024</b>	
Jan. 16, 2024 Letter	Birch Narrows Dene Nation provided a letter to Denison indicating that they were satisfied that Denison's responses to BNDN's comments on the draft EIS were adequate.
May 01, 2024 Mail Out	Denison sent the Chief of BNDN a project update package that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene.
Oct. 2, 2024 Email	Birch Narrows Dene Nation requested a copy of Denison's Nov. 29, 2023 letter and technical comment responses.
Oct. 17, 2024 Email	At the request of Birch Narrows Dene Nation, Denison provided a copy of their Nov. 29, 2024 letter and technical comment responses. Denison noted that, along with technical comment responses, this letter includes responses to broad areas of interest, previously identified to Denison as important by the Chief of BNDN.
Nov. 01, 2024 Letter	Denison mailed to all interested parties' letters of notice to share the status of the Environmental Impacts statement per the provincial regulatory process.
Nov. 21, 2024 Email	Birch Narrows Dene Nation requested Denison provide previously shared documents in an alternative file format. BNDN and Denison discussed <u>undertaking a</u> meeting to discuss comments on the Wheeler River Environment Impact Statement.
Nov. 22, 2024 Email	BNDN sent an email to Denison agreeing to meet to discuss technical comment responses.
Nov. 25, 2024 Email	Denison provided Birch Narrows Dene Nation with the requested documentation. BNDN and Denison continued planning a meeting to discuss comments on the Wheeler River Environmental Impact Statement.
<b>2025</b>	
Jan. 13, 2025 Email	Birch Narrows Dene Nation and Denison continued planning a meeting to resolve comments on the Wheeler River Environmental Impact Statement.
Jan. 17, 2025 Phone Call	Denison requested that Birch Narrows Dene Nation identify areas of the environmental assessment requiring further discussion between the parties. Denison requested that BNDN share information regarding their interests and rights in relation to Denison's activities at Wheeler River, and suggested the potential meeting would be in relation to these areas, including the comments made on the Wheeler River Project.

Date/Method	Summary
Mar. 03, 2025 Letter	In a letter sent to Denison, Birch Narrows Dene Nation rescinded their letter sent on January 16, 2024 which indicated Denison has resolved BNDN's comments on the Wheeler River Environmental Impact Statement. BNDN indicated that comments remain unresolved.
Mar. 12, 2025 Letter	In response to Birch Narrows Dene Nation's reversal of its previous position in terms of the resolution of comments for the Wheeler River Environmental Impact Statement, Denison requested to meet with BNDN to identify a path toward resolution of outstanding comments.
Apr. 17, 2025 Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.
May. 26, 2025 Letter	In a letter to the Canadian Nuclear Safety Commission and Denison, Birch Narrows Dene Nation indicated that they withdraw their support of the Wheeler River Project, specified public comments that are unresolved, and emphasized that their primary concern is that BNDN is not categorized as an Indigenous Community of Interest in relation to the Project.
Jul. 03, 2025 Letter	Denison responded to Birch Narrows Dene Nation's letter sent to the Canadian Nuclear Safety Commission by providing a letter to BNDN, the CNSC, and the Saskatchewan Ministry of Environment. Denison clarified their approach to the categorization of Indigenous Communities of Interest and their approach to engaging with communities that express interest in the Project. Denison also indicated responses would be provided in the future to BNDN's now unresolved comments. Denison additionally clarified that BNDN's previous correspondence did not indicate that BNDN supported the Project; rather, that previous correspondence indicated that BNDN found Denison's responses satisfactory to BNDN's public comments on the EIS.

## Appendix A-6: Key Engagement with Buffalo River Dene Nation

Date/Method	Summary
<b>2019</b>	
Dec. 16, 2019 Letter	Denison sent the Chief of BRDN a letter providing information about the Project, which included reference to the importance of understanding potential effects on the undertaking of Indigenous and / or Treaty rights within the Project area.
<b>2020</b>	
Mar. 24, 2020 Letter	Correspondence to inform BRDN about the temporary suspension of the Project EA.
<b>2021</b>	
Jan. 20, 2021 Letter	Denison provided correspondence to inform BRDN about the Project EA restart.
<b>2023</b>	
Apr. 2023 Postal Mail	Denison sent the Chief of BRDN a project update package that contained an annual update for the 2023 season, a booklet of the Wheeler River Project Environmental Assessment overview, and a one-page Project description in English, Cree, and Dene.
<b>2024</b>	
May 01, 2024 Postal Mail	Denison sent the Chief of BRDN a project update package that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene.
Nov. 01, 2024 Letter	Denison mailed to all interested parties' letters of notice to share the status of the Environmental Impacts statement per the provincial regulatory process.
<b>2025</b>	
Apr. 17, 2025 Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.

## Appendix A-7: Key Engagement with Lac La Ronge Indian Band

Date/Method	Summary
<b>2019</b>	
Dec. 16, 2019 Letter	Denison sent the Chief of Lac La Ronge Indian Band a letter providing information about the Project, which included reference to the importance of understanding potential effects on the undertaking of Indigenous and / or Treaty rights within the Project area.
<b>2020</b>	
Feb. 13, 2020 Meeting	Ongoing discussions with Lac La Ronge Indian Band led to a presentation about the Project to the Lac La Ronge Indian Band Lands and Resources Management Board at a regularly occurring meeting, with follow-up by Denison.
Mar. 24, 2020 Letter	Correspondence to inform Lac La Ronge Indian Band about the temporary suspension of the Project EA.
May 6, 2020 Letter	Acknowledgement from Lac La Ronge Indian Band re: Temporary Suspension of EA was received. Discussion was included in the correspondence regarding Denison returning in the future to do a presentation for the board of directors.
Aug. 10, 2020 Email	Discussions with Lac La Ronge Indian Band regarding the status of the Project as per LLRIB's request to keep them informed.
Nov. 12, 2020 Letter	A letter from Denison Mines to inform the Lac La Ronge Indian Band of the updated activities surrounding the EA for the Project and an offer to provide an update.
<b>2021</b>	
Jan. 20, 2021 Letter	Denison provided correspondence to inform Lac La Ronge Indian Band about the Project EA Restart.
<b>2023</b>	
Jan. 31, 2023 Email	Denison provided Lac La Ronge Indian Band with the requested shapefiles for the Wheeler River Project.
Feb. 13, 2023 Email	Lac La Ronge Indian Band and Denison arranged a phone call so that Denison could discuss items raised in a meeting between LLRIB and the Canadian Nuclear Safety Commission the week prior.
Feb. 14, 2023 Phone Call	Denison and Lac La Ronge Indian Band discussed the conversation between LLRIB and the Canadian Nuclear Safety Commission. Denison followed with an email providing information to LLRIB.
Feb. 15, 2023 Email	Lac La Ronge Indian Band confirmed receipt of the recap and files sent by Denison following their phone discussion.
Mar. 6, 2023 Email	Following a phone conversation and the transmission of shapefiles from Denison to Lac La Ronge Indian Band, Denison emailed LLRIB to suggest a meeting.
Apr. 2, 2023 Email	Following Denison's previous meeting proposal, Denison contacting Lac La Ronge Indian Band to propose a meeting pertinent to the Wheeler River Project.



Date/Method	Summary
Apr. 3, 2023 Email	Denison and Lac La Ronge Indian Band worked toward determining a date to meet in which Denison could present on the Wheeler River Project. Lac La Ronge Indian Band specified a date that would not work for Denison.
May 8, 2023 Email	Denison was unable to present to Lac La Ronge Indian band at their proposed time. Denison affirmed they would like to meet and LLRIB made a note of scheduled Denison to present in June. Subsequently there was not an opportunity for Denison to present in June.
Jun. 30, 2023 Letter	Denison provided a letter, via email, to Lac La Ronge Indian Band in response to LLRIB's comments on Denison's Environmental Impact Statement for the Wheeler River Project. Denison affirmed its interest in attending a LLRIB meeting in the future, and reiterated its interest in better understanding any land use activities in and around the Project.
Jul. 21, 2023 Email	Lac La Ronge Indian Band informed Denison of their next Traditional Land and Resources Meeting in Missinipe, SK, on August 30, 2023. LLRIB asked if Denison would be available to present information on the Wheeler River Project at this meeting. Denison indicated that they were hopeful that they could present at this meeting and were penciled into the agenda and were informed by LLRIB that an agenda would be distributed on August 9, 2023.
Aug. 9, 2023 Email	Denison reached out to Lac La Ronge Indian Band for a copy of the agenda pertinent to LLRIB's upcoming Traditional Land and Resources Meeting in which Denison was scheduled to present an overview of the Wheeler River Project at.
Aug. 21, 2023 Email	Denison provided a copy of their presentation to Lac La Ronge Indian Band in advance of the scheduled meeting on August 30, 2023.
Aug. 30, 2023 Email	Denison received the virtual meeting invite for Lac La Ronge Indian Band's Traditional Lands and Resources Advisory Committee Meeting, in which Denison was set to present at with both in person and virtual attendance.
Aug. 30, 2023 Meeting	Denison attended, both in person and virtually, the Lac La Ronge Indian Band Land and Resources Board meeting to provide an update on the Project and provide information in response to issues raised by LLRIB during the public review of the draft Environmental Impact Statement for the Wheeler River Project. After a delayed start, Denison's allotted presentation time was reduced.
Sep. 1, 2023 Email	Following the meeting between Denison and Lac La Ronge Indian Band's Traditional Lands and Resources Advisory Committee, in relation to topics discussed, Denison provided information resources to LLRIB and requested information from LLRIB, specifically regarding the contact for job postings and the Heritage Fund.
Sep. 5, 2023 Email	At the request of Denison, Lac La Ronge Indian Band provided a contact pertinent to LLRIB's community liaison and a contact pertinent to the LLRIB Heritage Fund.
Sep. 5, 2023 Email	Lac La Ronge Indian Band's Community Liaison and Denison exchanged dialogue in relation processes pertinent to job postings. Denison stated that they would include LLRIB's liaison contact in their distribution protocols.
Nov. 4, 2023 Letter	Denison sent correspondence to the Lac La Ronge Indian Band regarding the recent meeting between Denison and the LLRIB Traditional Lands & Resources Committee in Missinipe, in respect of the Wheeler River Project, and a response to the LLRIB's comments made to the Canadian Nuclear Safety Commission on the Project.

Date/Method	Summary
<b>2024</b>	
Jan. 23, 2024 Email	In an email from Denison to Lac La Ronge Indian Band, Denison requested conversation about the process going forward with respect to resolution of comments on the EIS, and an agreed upon time in which this conversation would occur was established.
Jan. 24, 2024 Phone Call	In a virtual call between Denison and a Lac La Ronge Indian Band Lands and Resources staff member, they indicated that the Lands and Resource Board has no further questions for Denison in relation to the Wheeler River Project, and Denison confirmed their willingness to share information with the Board as the Project progresses.
Jan. 30, 2024 Email	Denison emailed the Lac La Ronge Indian Band with a summary of their recent discussion and enquired as to the LLRIB's perspective on Denison's efforts to respond to issues and concerns with respect to Project activities.
Apr. 25, 2024 Email	In response to Denison's email following their previous discussion, the Lac La Ronge Indian Band requested a presentation from Denison at their next scheduled Traditional Lands and Resources Advisory Committee meeting, to receive updates on the Wheeler River Project and exploration activities. Denison confirmed their attendance at this meeting.
May 01, 2024 Mail Out	Denison sent the LLRIB Reserve Land Manager a project update package that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene.
May 10, 2024 Email	At Denison's request, the Lac La Ronge Indian Band provided information on the upcoming meeting in which Denison would provide a presentation to the LLRIB Traditional Lands and Resources Advisory Committee. Denison confirmed that they would present in person at the meeting.
May 17, 2024 Email	In advance of the upcoming Traditional Lands and Resources Advisory Committee, the Lac La Ronge Indian Band requested from Denison a copy of the presentation and contact information of Denison attendees.
Jun. 4, 2024 Email	At the request of the Lac La Ronge Indian Band, Denison provided a copy of the presentation slides and attendee contact information in advance of the upcoming Traditional Lands and Resources Advisory Committee. LLRIB confirmed location and presentation start time.
Jun. 12, 2024 Meeting	Denison met with the Lac La Ronge Lands and Resource Board for an in-person meeting in Saskatoon, for the purpose of providing Wheeler River Project updates, as requested by LLRIB, to support the resolution of LLRIB's comments made of the draft EIS.
Jun. 12, 2024 Email	Following Denison's recent meeting with the Lac La Ronge Indian Band Traditional Lands & Resources Advisory Committee, held in support of the resolution of LLRIB's comments on the draft EIS for the Wheeler River Project, LLRIB provided Denison with a land use map to which LLRIB referred during the meeting, in reference to the Project being located within LLRIB's traditional territory.
Jun. 18, 2024 Email	In response to the map received from the Lac La Ronge Indian Band, Denison responded confirming this same information was used throughout the planning of the Wheeler River Project. Denison georeferenced this map and provided it to the LLRIB with Denison's properties incorporated, showing that Denison's properties were outside of both the Missinipe Planning Area, and the Lac La Ronge Indian Band Traditionally Occupied Territory.

Date/Method	Summary
	Denison informed the LLRIB that, should activities fall within the area defined in the shared map, Denison would proactively reach out to the LLRIB for discussions.
Jun. 18, 2024 Email	In response to Denison's recent correspondence with the Lac La Ronge Indian Band, in which Denison provided a georeferenced version of LLRIB's map that illustrated property locations in relation to LLRIB traditional territory, the LLRIB responded indicating that the traditional territory boundaries shown in the map provided from LLRIB to Denison were outdated. . The LLRIB emphasized that boundaries have been updated internally, and that they consider the Wheeler River Project and several surrounding projects to be in their traditional territory, and as such, were seeking a contractual agreement with Denison.
July 28, 2024 Email	Denison replied to the Lac La Ronge Indian Band, outlining the approach taken by Denison in respect of agreements. s Denison reiterated their commitment to continuing efforts in responding positively to areas of interest identified by LLRIB in relation to business development/community investment. LLRIB responded indicating that this information would be shared with the committee.
Nov. 01, 2024 Letter	Denison mailed to all interested parties' letters of notice to share the status of the Environmental Impacts statement per the provincial regulatory process.
<b>2025</b>	
Feb. 12, 2025 - Email	Lac La Ronge Indian Band requested a meeting with Denison.
Mar. 03, 2025 - Email	In response to Lac La Ronge Indian Band's request to meet, Denison requested that LLRIB provide information on the desired scope of engagement.
Apr. 17, 2025 Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.

## Appendix A-8: Key Engagement with A la Baie Métis Local 21

Date/Method	Summary
<b>2016</b>	
Dec. 7, 2016 Community Meeting	Denison hosted a community meeting in Île-à-la-Crosse to introduce the company and introduce the Project.
<b>2017</b>	
Aug. 31, 2017 Meeting (Leadership)	Denison and the leaders of Île-à-la-Crosse and A La Baie Métis Local #21 met and an update on the Project was provided by Denison. Attendees discussed their interest in a formal MOU regarding working together in the future.
Dec. 15, 2017 Agreement	Denison, the Village of Île-à-la-Crosse and the A La Baie Métis Local #21 entered into a Memorandum of Understanding regarding the Wheeler River Project. The MOU outlined the overall objective to advance discussions on topics such as environmental sustainability, employment / education / training, business, community investment, project support and certainty, and participation in the regulatory processes.
<b>2018</b>	
Jan. 17, 2018 Workshop	As part of the engagement program for the Project, Denison organized a workshop in Île-à-la-Crosse for community and A La Baie Métis members to attend. The workshop gathered community and student input in relation to road alignment options, treated effluent discharge locations, mining methods, employment and training, and many other topics that community members provided feedback on or asked questions on.
<b>2019</b>	
Jun. 5, 2019 Letter	During the CNSC Public Review period for the Technical Proposal and Project Description for the Wheeler River Project, Denison sent a letter to A La Baie Métis Local #21 advising them about the Public Review period and offering them the opportunity to raise any questions or concerns to Denison staff and / or the regulators, with a specific focus on the potential exercising of Indigenous and / or Treaty Rights within the Project area.
Jun. 7, 2019 Phone Call	The A La Baie Métis Local President (Île-à-la-Crosse) called to discuss working together with Denison and the importance of involving the Métis in the Project and process.
Jun. 21, 2019 Letter	Denison received a letter from the Local Métis President of A La Baie Métis Local #21 advising that one of the businesses Denison is currently using is supported by the Métis Local.
Jul. 29, 2019 Community Event	Denison attended the Île-à-la-Crosse Family camp and was hosted by the Deputy Mayor of Île-à-la-Crosse. During the event, the Denison staff member discussed generally the Project with people.
Aug. 23, 2019 Site Visit	Denison hosts MN-S President, MN-S Minister of Environment/MN-S Region 3 President, and the Presidents of the Métis Locals at the Project site for a site tour and to discuss the Project, along with representatives from the CNSC and the Province of SK MOE.

Date/Method	Summary
	Participants: A La Baie Métis Local #21, CNSC, ERFN, KML, MN-S, MN-S - Region 3, Patuanak Métis Local #82, SK MOE, Village of Beauval / SML #37, Village of Île-à-la-Crosse, Village of Pinehouse Lake, and Denison Mines.
Sep. 23, 2019 Phone Call	Denison received a call from the Local Métis President of A La Baie (Île-à-la-Crosse) expressing appreciation for the site tour and support for the Project and for the community-oriented approach Denison is taking.
<b>2020 – Present: Engagement with A la Baie Métis Local 21 occurred through the MN-S</b>	

## Appendix A-9: Key Engagement with Métis Nation – Saskatchewan

Date/Method	Summary
<b>2019</b>	
Jun. 5, 2019 Letter	During the CNSC Public Review period for the Technical Proposal and Project Description for the Project, Denison sent a letter to MN-S - Region 3 advising them about the Public Review period and offering them the opportunity to raise any questions or concerns to Denison staff and / or the regulators, with a specific focus on the potential exercising of Indigenous and / or Treaty Rights within the Project area.
Jun. 25, 2019 Phone Call	Denison and MN-S connected regarding how MN-S would like to work with Denison. Denison was advised to provide an overview presentation to the MN-S President, who would then advise regarding the appropriate Local and Regional Presidents.
Jul. 10, 2019 Meeting	Denison and the MN-S (President, CEO and Executive Assistant) held an introductory meeting to provide an overview of the Project and chart the path forward between the parties.
Jul. 12, 2019 Email	As a follow up to the introductory meeting between Denison and MN-S, Denison sent a follow up email regarding requested information by MN-S.
Aug. 23, 2019 Site Visit	Denison hosts the MN-S President, MN-S Minister of Environment/MN-S Region 3 President, and the Presidents of the Métis Locals at the Project site for a site tour and to discuss the Project, along with representatives from the CNSC and the Saskatchewan Ministry of Environment.
Sep. 3, 2019 Phone Call	Métis Nation - Saskatchewan President advises Denison staff that Denison is undertaking consultation with MN-S and Métis Locals in accordance with MN-S protocols, and confirms Denison is meeting MN-S expectations.
Sep. 6&9, 2019 Meeting/Email	Ongoing process discussions between Denison and MN-S related to the delegation of authority for the Duty to Consult from the Locals to MN-S, for the Project
Sep. 12, 2019 Email	Denison contacts MN-S regarding setting up a meeting to brief them on the Project. Métis Nation - Saskatchewan requested that their legal counsel is included.
Sep. 13, 2019 Phone Call	Ongoing process discussions between Denison and MN-S. Denison and MN-S spoke about next steps regarding MN-S' preferred one voice approach and MN-S' alignment with Métis Locals.
Oct. 9, 2019 Email	Métis Nation - Saskatchewan provided Denison with copies of the formal delegation of the Duty to Consult from the Métis Locals to MN-S.
Oct. 15, 2019 Phone Call	Denison and MN-S discussed the recent delegation of the Duty to Consult from the Locals to MN-S in terms of how MN-S will execute this process. It was further discussed that Denison had planned on undertaking community meetings in November, and MN-S would provide direction to Denison regarding what to do with those planned meetings.
Oct. 9, 18, 23, 24, 29, 2019 1 Meeting 3 Emails 2 Letters	Ongoing process discussions between Denison and MN-S



Date/Method	Summary
Oct. 24, 2019 Email	Denison sent MN-S an email notifying them that planned engagement workshops in the Wheeler Partner Communities will be postponed as they had requested. The email further outlined points of communication confusion and sought advice regarding direction related to how the postponement of the community meetings should be communicated to the leaders of the communities.
Oct. 31, 2019 Letter	On behalf of Denison, Blakes sent a letter to Cassels Brock, the legal counsel for MN-S advising them Denison will host a requested meeting on November 5, 2019, with MN-S, its legal counsel, and invited guests. The correspondence also responded to the information requests.
Nov. 5, 2019 Meeting	Denison, MN-S representatives, and the Métis Local Presidents met to discuss process for engagement. Denison requested MN-S provide direction related to rescheduling the community workshops for January 2020.
Nov. 14, 2019 Email	Métis Nation - Saskatchewan provided Denison a draft exploration agreement which includes a request to fund an additional TLU study in respect of the Project.
Nov. 15, 2019 Letter	As a follow up to the meeting held on November 5, 2019 with the MN-S and the Local Presidents, Denison legal counsel shared with MN-S legal counsel the meeting notes, an example of the letters sent to the local leaders regarding the planned November, 2019 workshops, and correspondence requesting MN-S provide direction related to rescheduling the community workshops for January, 2020.
Nov. 15, 2019 Letter	As a follow up to the November 5, 2019, meeting to discuss the Project, Denison sent correspondence to MN-S regarding next steps related to a suitable agreement. The letter also notes that the Denison team is available to respond to any issues / concerns regarding the Wheeler River exploration activities.
Nov. 17, 18, 22, 24 25, 2019 Emails/phone call	Ongoing process discussions between Denison and MN-S.
Nov. 24, 2019 Letter	Denison sent a letter to MN-S offering to meet with MN-S to discuss Denison's 2020 exploration activities in support of the Project, and requests direction from MN-S regarding the rescheduling of the community meetings. Denison described the TLU data already collected by the Métis Locals and noted it will need to consider the extent and appropriateness of further TLU studies and their fit within the context of the draft exploration agreement.
Nov. 27, 2019 Email	Denison CEO & President sent a letter to MN-S regarding its interest in meeting to discuss the exploration activities associated with the Project, the rescheduling of the community visits into 2020, and indicating its interest in working together with MN-S on a suitable agreement.
Nov. 29, 2019 Letter	Métis Nation-Saskatchewan sent Denison correspondence indicating their interest in meeting to discuss a suitable agreement between the Parties. MN-S suggested dates in Toronto for an in-person meeting.
Dec. 1, 20, 24, 2019 Email/Phone call	Ongoing process discussions between Denison and MN-S.

Date/Method	Summary
Dec. 6, 2019 Letter	As part of the information-sharing process by Denison with Interested Parties regarding opportunities associated with the Project, Denison provided MN-S a list of potential procurement opportunities for the 2020 year.
Dec. 6, 2019 Email	Denison shared the upcoming request for proposals for supporting work in 2020 at the Wheeler River camp with MN-S. Métis Nation-Saskatchewan expressed concern with the proposed deadline and as a result, Denison modified the deadline in accordance with the time requested by MN-S.
Dec. 10, 2019 Meeting	Denison and MN-S met to discuss mutual interests and a path forward. Parties discussed MOU to address the Project's EA and development which would replace the MOUs with the Métis Locals. The meeting was scheduled at the request of Denison, while the meeting location and timing were proposed by MN-S. Denison sought, and MN-S committed to providing, guidance regarding the rescheduling of community meetings.
Dec. 11, 2019 Email	Métis Nation - Saskatchewan sent Denison a proposal for an additional TLU study with a budget from Wanda Consulting Ltd. of \$265,440.00.
Dec. 19, 2019 Email	Denison provided information to MN-S regarding a student opportunity for a Métis Citizen to participate as part of the Denison Future Mining Leaders Program.
Dec. 20, 2019 Email	Through legal counsel, Denison followed up with MN-S regarding their commitment to provide direction to Denison regarding the rescheduling of community meetings / workshops from 2019. Métis Nation-Saskatchewan replied that they would do so following the holiday season.
<b>2020</b>	
Jan. 10, 2020 Agreement	Denison provided MN-S a draft MOU for the Project, which addressed process, capacity, and funding for TLU activities requested by MN-S.
Jan. 14, 2020 MOU	Denison provided MN-S with draft MOU which, among other things, (i) offered to fund the TLU study up to \$250,000, (ii) proposed to replace Denison's existing MOUs with the Métis Locals; (iii) facilitated general information sharing between the parties. The budget for the TLU study was consistent with the budget provided by MN-S. Funding for a TLU study has consistently remained part of Denison's offer to engage with MN-S.
Jan. 15, 2020 Letter	Métis Nation-Saskatchewan sent correspondence to the CNSC regarding their concerns related to the Scoping Decision regarding Guidelines for the Project.
Jan. 16, 2020 Email	Denison's legal counsel followed up with MN-S' legal counsel regarding their indication they would provide Denison with direction in the new year regarding the rescheduling of community meetings at the request of MN-S.
Jan. 20, 2020 Letter	The CSNC responded to MN-S concerns regarding the Scoping Decision, and concluded MN-S will be identified as having potential interests in the Project going forward.
Jan. 20, 2020 Email	Denison's legal counsel shared with MN-S' legal counsel a first draft of a MOU for the Project, in accordance with their commitment to do so following a December 10, 2019, meeting with MN-S representatives.
Jan. 21, 2020 Email	Denison sent a follow-up to MN-S advising them Denison was pursuing additional channels to raise awareness about the Denison Future Mining Leaders Opportunity at PDAC.

Date/Method	Summary
Jan. 28, 2020 Letter/Email	Ongoing process discussions between Denison and MN-S.
Feb. 4, 10, 2020 Letter	Ongoing process discussion between Denison and MN-S.
Feb. 12, 2020 Email	Legal counsel for MN-S provided Denison's comments on the initial MOU Denison shared on January 2020.
Feb. 18, 2020 Email	Denison advised MN-S of a request made of Denison by a Local Métis community to provide funding to support community initiative
Feb. 20, 2020 Letter	Denison sent a letter to MN-S regarding the details of exploration permit applications and activities and its intention to advance such work in support of the EA and feasibility studies for the Project. The letter outlined Denison's repeated requests for direction to reschedule community meetings, offered to provide capacity funding for exploration permit reviews, and re-iterated Denison's interest in meeting with MN-S to discuss any issues or concerns with the proposed activities.
Feb. 21, 2020 Email	Denison invited MN-S to provide opening remarks at its EA workshop. Métis Nation-Saskatchewan replied that, due to the short notice, they would be unable to participate but appreciated the invitation and suggested a meeting in the following month.
Mar. 6, 2020 Phone Call / Emails	Denison contacted MN-S via letter as a follow up to several emails re: setting up a meeting at the end of March 2020.
Mar. 13, 2020 Email	The Province of Saskatchewan notified Denison that MN-S indicated they would meet with Denison, the Province, and potentially the CNSC. Due to Denison's postponement of the EA the meeting would also need to be postponed.
Mar. 19, 2020 Letter	Denison advised MN-S of the temporary suspension of the Project's EA due to COVID-19 disruptions and challenges.
Mar. 26, 2020 Email	Denison and the MN-S President exchanged emails regarding status of COVID-19 and protection of Métis citizens and Denison employees.
Apr. 9, 2020 Email	Ongoing process discussions between MN-S and Denison
Aug. 7, 2020 Conference Call	Ongoing process discussions between Denison and MN-S.
Sep. 19, 2020 Email	Ongoing process discussions between Denison and MN-S. Métis Nation – Saskatchewan provided Denison with revisions to the draft MOU for the Project and increased its funding request from \$250,000 to \$350,000.
Oct. 9, 2020 Letter	Ongoing process discussions between Denison and MN-S.
Oct. 13, 2020 Letter	Denison sent MN-S a letter seeking direction regarding the rescheduling of community meetings once the EA re-commences, and MN-S' potential interest in participating in discussions in respect of the Project.

Date/Method	Summary
Oct. 15, 2020 Email	As a follow up to the correspondence sent by Denison Mines to MN-S regarding engagement with municipalities, MN-S requested a discussion about the correspondence. A follow-up meeting was ultimately scheduled for October 21, 2020.
Oct. 21, 2020 Virtual Meeting	Denison and MN-S met by videoconference to discuss next steps for engagement.
Nov. 9, 2020 Virtual Meeting	Denison and MN-S met to discuss developing a path forward regarding engagement activities for the Project.
Nov. 12, 18 2020 Emails	In response to a meeting between MN-S and Denison regarding a path forward, Denison provided MN-S with a draft proposed outline of engagement activities proposed in the last month of 2020 and into 2021, for consultation and collaboration. Follow up on next steps.
Nov. 30, 2020 Phone Call	Denison and the MN-S Duty to Consult branch confirmed that Denison would draft a capacity funding workplan for MN-S, discussed the challenges of virtual meetings, and confirmed that MN-S does not represent the municipalities as they do not have Section 35 Rights.
Dec. 5, 2020 Workshop	Denison was invited to attend a Land, Language and Respect workshop from MN-S. Denison ultimately attended this workshop.
Dec. 9, 2020 Emails	Ongoing discussions between MN-S and Denison to develop a workplan for 2021 engagement activities.
Dec. 10, 2020 Phone Call	Denison received feedback from MN-S regarding 2021 engagement activities outlined in the draft workplan shared with MN-S on December 9, 2020. Work plan and budget receive positive initial feedback from MN-S staff.
Dec. 11, 2020 Letter	Denison provided a letter to MN-S providing an overview of the 2020 field season and COVID-19 responses by Denison and offering to provide a meeting to provide a Project update to MN-S, the Region, and the Locals.
<b>2021</b>	
Jan. 13, 2021 Email	Legal counsel for MN-S provided revisions of the MOU for the Project. Retained in the MOU was the commitment by Denison to provide specific funding dollars to MN-S for completion of at TLU study.
Jan. 18, 2021 Phone Call	MN-S staff advised Denison that the draft workplan, budget, and engagement activities were on hold until progress was made on commercial negotiations.
Jan. 20, 2021 Letter	Denison provided correspondence to inform MN-S about the Project EA Restart.
Feb. 5, 2021 Phone Call	Denison's legal counsel had a call with MN-S' legal counsel regarding the revisions shared by MN-S to the MOU on January 13, 2021. Commitment was made by MN-S' legal counsel to provide new revisions to the drafts in the following week.
Feb. 8, 2021 Phone Call	Métis Nation-Saskatchewan contacted Denison to get clarification regarding upcoming virtual meetings planned for northern municipalities. Denison confirmed the municipal nature of the meetings and that no meetings would be scheduled with Métis rights holders unless scheduled in collaboration with MN-S.

Date/Method	Summary
Feb. 9, 2021 Phone Call	Through their legal counsel to Denison's legal counsel, MN-S expressed concern with Denison conducting municipal meetings with the Communities of Interest of Beauval, Île-à-la-Crosse and Pinehouse Lake, owing to the residency of many Métis Citizens within these communities. Denison had worked in advance to clarify the meetings were intended as public meetings, not Métis-specific engagement, and introduced the meetings as such when occurring. The CNSC and the Province of Saskatchewan concurred with Denison these meetings represented public meetings, required for each of their regulatory processes.
Feb. 23, 2021 Letter	Denison sent a letter following up on feedback and concerns expressed by MN-S legal counsel and Minister Tex Bouvier (who had been in attendance during the Beauval municipal meeting) regarding the northern municipality meetings. The letter was sent to MN-S legal counsel as per the direction received from MN-S.
Feb. 25, 2021 Email	Ongoing process discussions between Denison and MN-S.
Mar. 22, 2021 Virtual Meeting	Métis Nation-Saskatchewan and Denison met to discuss the municipal meetings. Denison articulated the necessity of engagement activities occurring in parallel with commercial negotiations. MN-S indicated that engagement activities could not proceed absent a commercial agreement regarding Denison's exploration activities. Denison advised that the parties may be at a potential "impasse" as a result of MN-S' insistence on commercial negotiations taking precedence.
Apr. 9, 2021 Other	Métis Nation - Saskatchewan sent Denison a draft principles of engagement document in relation to the Project. Denison responded with commitment to review and provide a response.
Apr. 23, 2021 Letter	Denison provided a response to the April 9, 2021, MN-S Engagement Plan approach with a detailed workplan and supporting budget, and an offer to immediately fund TLU work as directed by MN-S.
Apr. 27, 2021 Email	Legal counsel for MN-S advised Denison that MN-S received Denison's correspondence on April 23, 2021, but were fully engaged with internal matters in advance of MN-S general election, and indicated they would follow up in the coming week. Denison's legal counsel indicated Denison's interest in understanding MN-S' interest in conducting the TLU study proposed in Denison's workplan.
May 26, 2021 Email	Métis Nation - Saskatchewan contacted Denison and the CNSC to request a meeting. The purpose of the meeting would be to discuss Denison's April 23, 2021, response to the high level workplan provided by MN-S on April 9, 2021, which included an offer to immediately fund MN-S requested TLU studies from December 2019.
Jun. 25, 2021 Presentation	At the request of MN-S, Denison participated in a meeting between the CNSC, Denison, and MN-S. During the meeting, MN-S presented their position regarding Denison's past engagement activities. Denison presented their engagement done to date, in accordance with the CNSC and CEAA 2012 requirements.
Jun. 25, 2021 Email	Immediately following a meeting between MN-S, Denison, and the CNSC on June 25, 2021, counsel for Denison and for MN-S set up a meeting to discuss the draft MOU, in existence since January 2020, in context with the newly requested Engagement and / or Métis Knowledge Study Agreement. The parties agreed to meet within the week.

Date/Method	Summary
Jun. 28, 2021 Email	Following a meeting on June 25, 2021, MN-S provided Denison and the CNSC with the presentation they made from the meeting June 25, 2021. The presentation outlined the high-level elements determined by MN-S as part of an engagement process with Denison.
Jun. 29, 2021 Meeting	Denison's legal counsel and MN-S' legal counsel met to discuss a potential engagement agreement between MN-S and Denison. Métis Nation-Saskatchewan confirmed they envisioned an engagement agreement in which an agreed-upon workplan / engagement activities would be attached accordingly.
Jun. 29, 2021 Email	Following a June 25, 2021, meeting between MN-S, the CNSC, and Denison, the MN-S Duty to Consult Liaison Officer contacted Denison's Environment Manager to arrange an introductory meeting. Denison agreed to this and dates at the end of July were arranged. Six days prior to meeting, MN-S requested to postpone the meeting owing to the needs of the invited Elder. Denison later confirmed a new date requested by MN-S and suggested the proposed agenda include a review of the proposed engagement workplan shared with MN-S on April 23, 2021. Denison was later advised by the consultant for MN-S that that MN-S did not want to discuss the proposed engagement workplan at the agreed-upon meeting for early August.
Jul. 5, 2021 Letter	Métis Nation - Saskatchewan sent a letter to Denison as a follow up to a June 25, 2021, meeting held between MN-S, the CNSC, and Denison. The correspondence noted a number of key items / issues: a general concern with Denison's approach to trust and engagement; and concerns with meetings originally scheduled to be held in the fall, 2020. The letter outlined next steps, which were for MN-S counsel to share with Denison's legal counsel a capacity funding agreement that would incorporate a proposed (Engagement) workplan for the Project. The letter concluded by noting that parties should set a meeting in the coming weeks to discuss the deliverables.
Jul. 7, 2021 Email	As a follow-up to a June 25, 2021, meeting between MN-S, the CNSC, and Denison, Denison shared the presentation made during the meeting, along with a detailed record of engagement on matters between MN-S and Denison up to the date of the June 25, 2021, meeting.
Jul. 7, 2021 Letter	As a follow up to a June 25, 2021, meeting between MN-S, the CNSC, and Denison, Denison sent correspondence to MN-S. The correspondence referenced that the meeting provided an opportunity to reset the relationship with a clear division between commercial negotiations and engagement in respect of the Project. The correspondence also outlined Denison's expectations regarding respectful engagement practices between parties. The correspondence also noted that Denison's legal counsel had been directed to work with MN-S' legal counsel on a draft capacity funding agreement, while also directing Denison's engagement team to work with MN-S' engagement team to develop a mutually acceptable workplan and schedule for engagement activities in respect of the Project, which would be then incorporated into a draft capacity funding agreement.



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Jul. 14, 2021 Letter	Denison sent correspondence to MN-S responding to their July 5, 2021, letter related to a meeting held on June 25, 2021, between MN-S, the CNSC, and Denison. Denison's letter outlines specific items / issues: makes clear Denison's perspective that commercial negotiations should be separate and apart from Métis engagement activities and associated engagement workplans; acknowledged and apologized that MN-S felt Denison disrespected them in relation to meetings held in February 2021; re-iteration of Denison's offer to provide funding to MN-S to offset costs associated with the EA of the Project and permitting of exploration activities; and an invitation to MN-S to provide invoices and supporting documentation related to MN-S expenses incurred to date for the purposes of engaging with Denison.
Jul. 20, 2021 Email	Legal counsel for MN-S provided Denison's legal counsel a draft capacity funding agreement for review and comment. Denison's legal counsel responded that further review was ongoing; however, also responded immediately that Denison would not accept provisions that related to commercial negotiations within a capacity funding agreement exclusively for the EA process for the Project.
Aug. 2, 2021 Email	A meeting planned between MN-S and Denison was cancelled by MN-S one day prior to it occurring. Métis Nation-Saskatchewan suggested the meeting could be rescheduled in the coming weeks. Denison had adjusted the proposed agenda to remove discussions on the engagement workplan to a future meeting.
Aug. 2, 2021 Phone Call	Prior to the planned meeting for August 3, 2021, between Denison and MN-S, Denison's Environment Manager, and the MN-S' Duty to Consult Liaison Officer discussed the development of the agenda. The DTC Officer confirmed the preferred removal of the EA workplan and deferred these discussions. Also discussed was the relationship between the capacity funding agreement and the EA workplan, with reference made to the need for the capacity funding agreement to be in place or moving forward prior to the development of an EA workplan.
Aug. 3, 2021 Email	Denison's legal counsel provided MN-S' legal counsel revisions to the capacity funding agreement in support of the EA activities for the Project.
Aug. 10, 2021 Email	Denison's Environment Manager followed up with MN-S to reschedule the postponed August 3, 2021, meeting.
Aug. 18, 2021 Email	Denison's President and CEO received feedback via email from MN-S' Senior Director Lands Consultation, expressing concern edits Denison's legal counsel made to the capacity funding agreement provided by MN-S legal counsel in July 2021.
Aug. 20, 2021 Email	Denison's President and CEO responded to MN-S' Senior Director Lands and Consultation email dated August 18, 2021, which raised concerns about edits made to the capacity funding agreement. It was noted in the response that all work to date, had been conducted between legal counsel as was agreed to in a meeting on June 25, 2021, between MN-S, CNSC, and Denison. The correspondence noted that follow up would occur with Denison's legal counsel and Denison would respond more specifically to the concerns raised.
Aug. 21, 2021 Text Message	Denison's Corporate Social Responsibility Manager received a text from the Northern Region 3 office requesting to meet directly. Denison responded by text, noting that Denison's EA regarding the Project occur by working directly with MN-S and through them.

Date/Method	Summary
Aug. 23, 2021 Email	Métis Nation - Saskatchewan's Senior Director Lands and Consultation replied to Denison's President and CEO appreciating the response and noting the parties were to continue to move forward on the development of the capacity funding agreement.
Aug. 23, 2021 Meeting	Denison's Environment Manager and MN-S' Duty to Consult Liaison met to discuss next steps in working together.
Aug. 25, 2021 Text Message	Denison's Corporate Social Responsibility Manager received a text from MN-S' Northern Region 3 requesting funds to engage with Denison. Denison replied that we are following MN-S direction regarding engagement activities, which is to work with and through them for all items, including funding.
Sep. 8, 2021 Email	Denison's President and CEO responded directly to concerns raised by the MN-S' Senior Director Land and Consultation on the Denison revisions to the capacity funding agreement. The response focussed on clarifying the intent of Denison's legal counsel, to which the Senior Director committed to responding back within a few business days.
Sep. 20, 2021 Email	Denison's President and CEO responded directly to concerns raised by the MN-S' Senior Director Land and Consultation on the Denison revisions to the capacity funding agreement. The Senior Director responded in that he had nothing further to add or clarify and suggested parties continue to work on the capacity funding agreement and would share a revised draft to Denison shortly.
Sep. 20, 2021 Email	The Senior Director Lands and Consultation of the MN-S offered to host a meeting for the Denison President and Chief Executive Officer and team to provide an overview of the MN-S structure and current context. The President and CEO agreed and offered some dates that would work for Denison.
Sep. 22, 2021 Letter	Métis Nation - Saskatchewan Senior Director Lands and Consultation sent Denison's President and CEO a letter outlining a proposed budget and high level workplan related to MN-S' and Denison working together on engagement and associated activities for the Project. Denison's President and CEO responded by noting Denison would review and confirm the progression of the work supporting the development of the budget.
Sep. 24, 2021 Email	In response to rising COVID-19 cases in the City of Saskatoon, the MN-S requested to move the planned meeting of October 7, 2021 from in-person to online. Denison changed the meeting type per this request.
Sep. 29, 2021 Email	In response to the September 17, 2021, correspondence sent to MN-S by Denison regarding advanced review of draft exploration activities and associated permits for 2022, MN-S sent Denison a proposed budget for review. Denison agreed to the elements of the budget that corresponded directly with the initial request, and MN-S agreed with that approach. Métis Nation-Saskatchewan agreed to provide feedback by October 15, 2021.
Oct. 1, 2021 Email	Based on Denison's September 22, 2021, receipt of MN-S' budget memo related to the Project, Denison proposed adding this to the agenda for the planned October 7, 2021, meeting. Métis Nation-Saskatchewan requested this not be added to the agenda and Denison agreed.
Oct. 5, 2021	The Duty to Consult Office for the MN-S suggested that Denison and the MN-S meet to discuss the proposed budget memo sent to Denison on September, 2021. The proposed time

Date/Method	Summary
	to meet was following the planned overview meeting on October 7, 2021. Denison agreed to this meeting and next steps.
Oct. 8, 2021 Email	Denison's Environment Manager contacted MN-S regarding rescheduling the August 3, 2021, meeting for October 7, 2021. The meeting agenda remained the same as that proposed for early August 2021 - including an overview of MN-S and a deferral of discussion on engagement workplans.
Oct. 13, 2021 Email	Denison provided feedback to the Senior Director Lands and Consultation at the MN-S on the budget memo and workplan shared with Denison on September 22, 2021, and noted that Denison and the MN-S had a meeting where Denison staff would discuss feedback related to the workplan, in the hopes of finalizing the workplan so it would form the basis for a capacity funding agreement between the parties. The MN-S Senior Director responded that such a meeting was not the appropriate place to discuss the capacity funding agreement. Denison clarified by stating that the meeting was not intended to involve discussions about the capacity funding agreement; rather the deliverables for the environmental assessment process and associated workplan that would form the basis for capacity funding - but not the capacity funding agreement itself.
Oct. 14, 2021 Meeting	Denison and the MN-S met to discuss elements of a workplan to support engagement activities for the Project by the MN-S. Denison provided its perspective on general support for capacity funding that would advance MN-S participation in the environmental assessment process, and also identified areas of concern with the proposed budget and workplan as currently presented. A follow up meeting was scheduled in order for Denison to provide further details to MN-S.
Oct. 19, 2021 Meeting	As a follow up to an initial discussion about an engagement workplan and budget for the MN-S to participate in the environmental assessment process for the Project, Denison and the MN-S met to discuss more specifics about a proposed plan and path forward. At the conclusion of the meeting, the MN-S committed to providing Denison a more formal response on a workplan by the end of October 2021 in order for work to commence in November 2021.
Oct. 29, 2021 Phone Call	Denison's legal counsel and counsel for the MN-S connected about advancing the capacity funding agreement, once Denison and MN-S technical teams had finalized an updated budget and proposed workplan to which the capacity funding agreement would support.
Nov. 2, 2021 Email	As a follow up to an earlier email sent from Denison's President and Chief Executive Officer offering dates to meet for an overview presentation from the MN-S, the Senior Director Lands and Consultation indicated support for the concept, and moved the concept toward the end of January, 2022 owing to a department need. The Senior Director requested Denison prioritize advancing various agreements that have been worked on between the parties, including but not only, the capacity funding agreement to support the MN-S participation in the environmental assessment process for the Project.
Nov. 15, 2021	Denison received correspondence from Kineepik Métis Local #9 (Pinehouse Lake) advising Denison that they had notified the Aboriginal Consultation Branch of the Province of Saskatchewan and the Métis Nation - Saskatchewan on November 12, 2021 that it had formally revoked its previously delegated Duty to Consult to the Métis Nation - Saskatchewan. Denison's CEO had been in copy to the email sent in regard to this matter on November 12,

Date/Method	Summary
	2021. The correspondence requested that Denison engage directly with KML going forward and immediately.
Nov. 17, 2021 Letter	Denison received a revised budget and memo from the MN-S regarding engagement activities and knowledge studies in relation to the Project. The materials received noted the proposal required further refinement and concrete timeline setting once the MN-S was able to get in touch with the Locals.
Nov. 18, 2021 Email	Denison's CEO followed up directly with the President of the MN-S advising that, while the KML had revoked its delegated Duty to Consult to the MN-S, Denison's technical and legal teams had been instructed to continue advancing work with the MN-S to collaboratively consider how the change would impact various activities between the parties, including the engagement activities for the Project.
Nov. 18, 2021 Email	Denison responded to the MN-S' revised budget information related to engagement activities / workplan for the Project sent on November 17, 2021. Denison's response noted that the proposed workplan would likely require further modification owing to the recently revoked Duty to Consult by the KML from MN-S.
Nov. 19, 2021 Email	A member of Denison's technical team emailed the Métis Nation - Saskatchewan's technical team to request to get together to discuss the engagement and knowledge study elements of the recently provided budget from MN-S, in light of the recently revoked delegation of the Duty to Consult by KML to the MN-S. Denison also offered to provide a technical meeting to keep the MN-S informed about items related to the environmental assessment as they were progressing.
<b>2022</b>	
Mar. 9, 2022 Email	Denison sent a follow up email to the Métis Nation - Saskatchewan (related to an email sent in November in relation to continuing to move forward with the MN-S despite the change with Kineepik Métis Locals), and offered to share information with the MN-S regarding the Wheeler River Project and on the findings of the environmental assessment.
Mar. 25, 2022 Letter	The Métis Nation - Saskatchewan sent a letter to Denison expressing its interests in advancing capacity funding agreement discussions pertaining to the Wheeler River Project. The letter included a budget and associated workplan for proposed activities and also included a Capacity Funding Agreement. The MN-S requested Denison provide a response within two weeks.
Mar. 25, 2022 Email	The Métis Nation - Saskatchewan responded to Denison's email of March 9, 2022 offering to share information about the Wheeler River Project and findings of the environmental assessment. The MN-S response referred Denison to separate correspondence, issued on this same day, pertaining to capacity funding and moving forward.
Apr. 4, 2022 Email	Denison responded to an email from the Métis Nation - Saskatchewan requesting an updated budget and capacity agreement from Denison in respect of the Wheeler River Project. Denison noted that they were unable to respond by the date requested but would be responding shortly thereafter.
Apr. 12, 2022 Email	Denison emailed Métis Nation - Saskatchewan regarding the Spring 2022 Engagement Tour. Denison offered to collaborate with MN-S to present the Environmental Assessment findings to Métis Citizens from A La Baie Métis Local, Sipishik Métis Local, and Patuanak Métis Local.

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Apr. 12, 2022 Letter	Denison responded to a letter and attachment from Métis Nation - Saskatchewan, where Denison committed to working with the MN-S on a mutually agreed-upon workplan and budget, along with providing a Project update. Denison also provided its perspective that funding for the workplan and budget (capacity funding) could be delivered through a simple mechanism recently deployed between the parties on the Feasibility Field Test or 2022 Exploration Activities.
Apr. 19, 2022 Email	Métis Nation - Saskatchewan stated that they were reviewing Denison's letter of April 14, 2022 with respect to capacity funding and would be in contact shortly.
Apr. 20, 2022 Email	Métis Nation - Saskatchewan responded to Denison's response pertaining to a capacity funding document. MN-S highlighted its preference that the next steps include being provided with a markup of the capacity funding agreement and written feedback on the budget.
Apr. 21, 2022 Email	Métis Nation - Saskatchewan responded to Denison, declining Denison's offer to collaborate on engagement meetings. MN-S stated that they are prioritizing securing the capacity funding agreement prior to undertaking engagement activities with Denison, and suggested that following the conclusion of the capacity funding agreement, Denison and the MN-S meet to develop a plan forward.
Apr. 21, 2022 Email	Denison responded to Métis Nation - Saskatchewan, stating that Denison will go forward with its plan to undertake engagement activities with the municipalities and public members of Île-à-la-Crosse, Beauval, and Patuanak. Denison affirmed their openness to collaborate with MN-S on engagement activities, when MN-S wishes to do so.
May 10, 2022 Email	Denison responded to Métis Nation - Saskatchewan's requests regarding an updated capacity funding agreement and comments on MN-S's proposed budget and workplan. Documents pertaining to both these topics were provided to the MN-S.
May 17, 2022 Email	The Métis Nation - Saskatchewan responded to Denison's updated capacity funding agreement and proposed workplan and budget comments. They stated they were reviewing the comments and supporting documentation provided by Denison, and would be in touch soon.
May 24, 2022 Email	Denison responded to Métis Nation - Saskatchewan concerns, raised by MN-S in a meeting with the Canadian Nuclear Safety Commission. MN-S concerns centered around Denison's engagement activities in communities with Métis presence. Denison outlined its response to the concerns raised, which included cancelling the meeting in Île-à-la-Crosse while maintaining the community meeting in Beauval owing to the connection of that meeting with English River First Nation (La Plonge).
Jun. 15, 2022 Email	In response to Denison sending an updated capacity funding agreement, Denison was informed by Métis Nation - Saskatchewan that their legal counsel had forwarded a revised version of the updated capacity funding agreement to Denison's legal counsel for review.
Jun. 15, 2022 Agreement	The Métis Nation - Saskatchewan's legal counsel provided Denison's legal counsel with revisions to the updated capacity funding agreement Denison had sent earlier in May, 2022.
Jun. 16, 2022 Email	Denison confirmed that they received revisions of agreement from Métis Nation - Saskatchewan. Denison enquired if MN-S has had time to review Denison's memo on the

Date/Method	Summary
	Workplan and Budget to be incorporated into the agreement and sought an estimate in relation to the response time required by the MN-S on this document.
Jun. 20, 2022 Email	Métis Nation - Saskatchewan stated that they were in the process of reviewing Denison's memo on the Workplan and Budget being incorporated into the capacity funding agreement.
Aug. 19, 2022 Agreement	Denison's legal counsel provided the Métis Nation - Saskatchewan's legal counsel with revisions to the updated capacity funding agreement the MN-S had sent earlier in June, 2022.
Sep. 2, 2022 Agreement	The Métis Nation - Saskatchewan's legal counsel provided Denison's legal counsel with revisions to the updated capacity funding agreement Denison had sent earlier in August, 2022.
Sep. 19, 2022 Email	Denison confirmed to MN-S' legal counsel that they agreed with the revised capacity funding agreement provided by the MN-S on September 2, 2022,
Oct. 24, 2022 Capacity Agreement	Denison and Métis Nation – Saskatchewan signed a Capacity Funding Agreement in respect of Denison's support toward the MN-S undertaking a Métis Knowledge Study in respect of the Project, which also included support for necessary engagement work for MN-S to facilitate and coordinate with Métis Locals and Regional Directors and Denison.
Oct. 28, 2022 Email	After signing the Capacity Funding Agreement, Denison connected with Métis Nation – Saskatchewan to propose a meeting to discuss next steps.
Oct. 31, 2022 Email	Métis Nation – Saskatchewan responded to Denison's meeting request to discuss the capacity funding agreement next steps.
Nov. 1, 2022 Email	Denison acknowledged Métis Nation – Saskatchewan's response and indicated they were awaiting direction from the MN-S with respect to executing the capacity funding agreement.
Nov. 7, 2022 Email	Métis Nation – Saskatchewan and Denison determined a meeting time to discussed next steps for the capacity funding agreement.
Nov. 8, 2022 Email	Denison responded to Métis Nation - Saskatchewan's meeting invite to discuss the capacity funding agreement.
Nov. 9, 2022 Email	Métis Nation – Saskatchewan provided to Denison a schedule for the capacity funding agreement meeting.
Nov. 17, 2022 Meeting	Denison and Métis Nation – Saskatchewan met to discuss the implementation of the Capacity Funding Agreement.
Nov. 19, 2022 Email	Métis Nation Saskatchewan requested a copy of the Environmental Impact Statement from Denison.
Nov. 21, 2022 Email	Denison provided Métis Nation – Saskatchewan with a copy of the Draft Environmental Impact Statement.
Dec. 21, 2022 Meeting	Denison and Métis Nation – Saskatchewan had a virtual meeting to touch base on plans associated with Capacity Funding Agreement and execution of the associated workplan.
<b>2023</b>	



Date/Method	Summary
Jan. 9, 2023 Email	Denison provided notes to Métis Nation – Saskatchewan summarizing highlights from their December 21, 2022, meeting pertaining to the Capacity Funding Agreement and execution plans for the associated Workplan.
Jan. 11, 2023 Phone Call	Denison and Métis Nation – Saskatchewan had a phone discussion relating to implementing the agreed-upon workplan tied to the Capacity Funding Agreement. Denison provided an email to MN-S recapping the phone discussion.
Jan. 18, 2023 Email	Denison enquired with Métis Nation – Saskatchewan as to the status of MN-S enacting the first steps of the workplan associated with the capacity funding agreement.
Jan. 19, 2023 Capacity Agreement	To provide Métis Nation – Saskatchewan with additional funding requested to support the EIS review, Denison advised the MN-S that Denison's legal counsel and MN-S' legal counsel had amended the Capacity Funding Agreement and workplan in association with the supplementation of additional requested funding.
Jan. 23, 2023 Email	Métis Nation – Saskatchewan informed Denison of the confirmed presentation dates with NR-1 and NR-3, to be set in February, and sought Denison's attendance at the meetings.
Jan. 25, 2023 Email	Two Worlds Consulting, the consultant for Métis Nation - Saskatchewan, requested a copy of the Indigenous Engagement Report, which Denison then provided a link to.
Jan. 26, 2023 Email	Denison responded to Métis Nation – Saskatchewan with regard to the requested upcoming meetings for NR1 and NR3 in relation to the Project. Denison was seeking to understand the purpose of the meetings to prepare meeting content appropriately.
Jan. 30, 2023 Email	At the request of Métis Nation - Saskatchewan, a meeting was being arranged between Denison and MN-S along with Two Worlds Consulting, the Canadian Nuclear Safety Commission, and the Government of Saskatchewan, to discuss the upcoming meetings and presentations with MN-S NR1 and NR3 Regions relating to the Environmental Impact Statement review.
Feb. 1, 2023 Email	Métis Nation – Saskatchewan transmitted an agenda pertaining to the upcoming NR1 Regional Council meeting for environmental impact statement comments in relation to the capacity funding agreement and associated workplan to Denison, the Government of Saskatchewan, and the Canadian Nuclear Safety Commission. MN-S stated that the agenda for the NR3 Regional Council Meeting set to take place the following day would be communicated once finalized and would be similar to the NR1 agenda.
Feb. 6, 2023 Email	Métis Nation – Saskatchewan requested that Denison provide a copy of their presentation before a specified deadline for the engagement meetings associated with review of the environmental impact statement, capacity funding agreement and workplan.
Feb. 8, 2023 Email	Upon the request of Métis Nation - Saskatchewan, Denison provided a copy of the presentation by the deadline specified to be used during the upcoming meetings related to review of the environmental impact statement, capacity funding agreement and workplan.

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Feb. 11, 2023 Meeting	In the first of two meetings, Denison met with Métis Nation – Saskatchewan and NR1 leadership along with Two Worlds Consulting, the Canadian Nuclear Safety Commission, and the Government of Saskatchewan, to present a review of the Project and associated draft Environmental Impact Statement, with the intent that this would additionally support MN-S' efforts towards progressing the Métis Knowledge Study. Denison presented PowerPoint slides to supplement dialogue and provide the EIS review.
Feb. 12, 2023 Meeting	In the second of two meetings, Denison met with Métis Nation – Saskatchewan and NR3 leadership along with Two Worlds Consulting, the Canadian Nuclear Safety Commission, and the Government of Saskatchewan, to present a review of the Environmental Impact Statement, with the intent that this would additionally support MN-S' efforts towards progressing the Métis Knowledge Study. Denison presented PowerPoint slides to supplement dialogue and provide the EIS review.
Feb. 15, 2023 Email	Following engagement meetings occurring on February 11, 2023, and February 12, 2023, Métis Nation – Saskatchewan requested from Denison dates in which a follow up engagement session could be hosted, to be held jointly as per the request of NR1 and NR3.
Feb. 17, 2023 Email	After a phone call between Denison and Métis Nation – Saskatchewan pertaining to MN-S's proposed meeting, Denison identified available times and dates, and clarified the scope of the presentation they would provide.
Feb. 17, 2023 Email	Following a meetings and presentations between Métis Nation – Saskatchewan and Denison on February 11 and 12, 2023, Denison reached out to MN-S to confirm that MN-S wished to receive a copy of Denison's meeting notes.
Feb. 21, 2023 Email	Métis Nation – Saskatchewan transmitted the meeting invite and agenda for the proposed follow up meetings pertinent to the environmental impact statement review to Denison, the Canadian Nuclear Safety Commission, NR1 and NR3, and the Government of Saskatchewan.
Feb. 22, 2023 Email	Following a phone discussion between Denison and Métis Nation- Saskatchewan pertaining to the availability of funding relating to the upcoming proposed follow up meetings with NR1 and NR3, in which Denison received a budget for, Denison provided a follow up email to highlight key areas of this phone discussion.
Feb. 23, 2023 Email	Métis Nation – Saskatchewan canceled the proposed in-person engagement follow-up meeting, which would be rescheduled as virtual and extended to approved attendees.
Feb. 24, 2023 Email	Denison responded to the concerns of Métis Nation – Saskatchewan as related to the funding of meetings and the budget available in the Capacity Funding Agreement. Denison reiterated flexibility in the CFA, their willingness to discuss workplan adjustments, evidenced by the February 9th, 2023, CFA amendment.
Feb. 27, 2023 Email	Métis Nation – Saskatchewan canceled the follow up virtual engagement meetings, informing Denison that MN-S elected to conduct an internal review of the EIS for submission to the Canadian Nuclear Safety Commission. Denison had joined the virtual meeting and was advised of the cancelation afterwards.
Mar. 22, 2023 Email	Denison provided Métis Nation – Saskatchewan with Denison's meeting notes from the NR1 and NR3 meetings.

Date/Method	Summary
Apr. 3, 2023 Email	Denison requested an update from Métis Nation – Saskatchewan on the progress of the Workplan for the Métis Knowledge Study, associated with the Capacity Funding Agreement.
May. 24, 2023 Email	Métis Nation – Saskatchewan contacted Denison to provide an update on the Workplan associated with the Capacity Funding Agreement. MN-S provided an update on plans and timelines. MN-S proposed meeting for further discussion. Denison affirmed willingness to meet and both flexibilities and limitations in terms of schedule adjustments.
May. 31, 2023 Email	Denison followed up the Métis Nation – Saskatchewan to suggest a meeting for an update in relation to the capacity funding agreement and associated workplan.
Jun. 6, 2023 Email	Denison followed up the Métis Nation – Saskatchewan to suggest a meeting for an update in relation to the capacity funding agreement and associated workplan and both MN-S and Denison agreed to a date in which this meeting would occur.
Jun. 12, 2023 Meeting	Denison met with Métis Nation – Saskatchewan to receive an update on the work that MN-S is doing, specifically in relation to the Métis Knowledge Study for the Wheeler River Project. Denison suggested dates in which they could provide a project introduction and materials to support MN-S staff undertaking the Métis Knowledge Study work.
Jun. 16, 2023 Email	Following their previous meeting and Denison's last email to Métis Nation - Saskatchewan, Denison followed up with MN-S to determine agreeable dates in which Denison could provide MN-S with a project update and information to support their work on the Métis Knowledge Study related to the Wheeler River Project.
Jun. 26, 2023 Meeting	Denison met with Métis Nation – Saskatchewan to discuss the development of a process to resolve comments made on the Environmental Impact Statement for the Wheeler River Project.
Jun. 27, 2023 Email	Following their previous meeting in which Denison and Métis Nation – Saskatchewan discussed a process to resolve comments made on the Environmental Impact Statement for the Wheeler River Project, Denison provided MN-S with an email to recap meeting details and provide a copy of the presentation.
Jul. 27, 2023 Meeting	Denison met with Métis Nation – Saskatchewan to discuss the status of the Métis Knowledge Study and a process to resolve MN-S's comments on the Environmental Impact Statement for the Wheeler River Project. The possibility for MN-S to have a Wheeler River site tour was added to the discussion
Jul. 28, 2023 Email	Following the previous meeting between Denison and Métis Nation – Saskatchewan, Denison provided a summary of items discussed with MN-S's verification.
Aug. 15, 2023 Email	Denison and Métis Nation - Saskatchewan worked on coordinating a site tour in which MN-S would receive a tour of the Wheeler River Project Site. MN-S enquired as to the possibility of adjusting the date of the site tour, which was not possible due to prior commitments for Denison.
Aug. 30, 2023 Email	Denison and Métis Nation - Saskatchewan agreed to virtually conduct the planned upcoming Métis Knowledge Study update meeting. MN-S enquired as to dates in relation to a Joint Working Group meeting.

Date/Method	Summary
Aug. 31, 2023 Meeting	Métis Nation - Saskatchewan met with Denison to provide an update on the Métis Knowledge Study, per the Capacity Funding Agreement, and to have a discussion about next steps for engagement with MN-S and Métis Locals with respect to the Wheeler River Project.
Sep. 5, 2023 Email	After being unable to accommodate a site tour on the date previously suggested by Métis Nation - Saskatchewan, MN-S expressed interest in receiving a site tour at a later date. Denison and MN-S agreed that a spring tour would be feasible.
Sep. 5, 2023 Email	Métis Nation - Saskatchewan and Denison worked to establish a date in which a first meeting of a Joint Working Group, organized by the MN-S, could occur.
Sep. 14, 2023 Email	Métis Nation - Saskatchewan and Denison worked to establish a date in which a first meeting of a Joint Working Group, organized by the MN-S, could occur.
Sep. 15, 2023 Email	Métis Nation - Saskatchewan and Denison worked to establish a date in which a first meeting of a Joint Working Group, organized by the MN-S, could occur.
Oct. 2, 2023 Email	Denison requested a discussion in which Métis Nation - Saskatchewan could provide an update on their effort to coordinate a date in which a first meeting of a Joint Working Group, organized by the MN-S, could occur.
Oct. 7, 2023 Email	Following Denison's meeting request, Denison followed up with Métis Nation - Saskatchewan to request a meeting to discuss areas of interest from within the Métis Knowledge Study.
Oct. 11, 2023 Email	Denison contacted Métis Nation - Saskatchewan to request an update on the status of the Métis Knowledge Study, to request an update on the planning of meetings between Denison and MN-S in respect of EIS comments, and to enquire as to the status of invoices per the Capacity Funding Agreement.
Oct. 24, 2023 Report	Métis Nation - Saskatchewan provided Denison with a copy of the draft Métis Knowledge Study as part of the Capacity Funding Agreement and associated workplan. MN-S informed Denison there would be an upcoming community review of the study.
Oct. 30, 2023 Email	Denison confirmed to Métis Nation - Saskatchewan receipt of the draft Métis Knowledge Study and requested a meeting to discuss areas of interest from within the report.
Nov. 14, 2023 Email	Denison informed Métis Nation - Saskatchewan that Denison is advancing to the stage in the Federal and Provincial EA review process in which they are looking to update the draft EIS to the Final version. Denison requested a meeting with MN-S with the intent to discuss a process for the incorporation of the Métis Knowledge Study information into the Final EIS.
Dec. 1, 2023 Letter	Denison provided responses to the Métis Nation - Saskatchewan's comments made on the draft Environmental Impact Statement for the Wheeler River Project.
Dec. 1, 2023 Email	Following Denison's responses to the Métis Nation - Saskatchewan's comments made on the draft Environmental Impact Statement for the Wheeler River Project, MN-S provided an update on the status of their internal review of the Métis Knowledge Study, an update on the status of invoicing per the Capacity Funding Agreement, and MN-S suggested future time to meet with Denison

Date/Method	Summary
Dec. 4, 2023 Email	Following their recent update, Métis Nation - Saskatchewan provided an additional update to Denison on the progress of invoicing per the Capacity Funding Agreement and the status of MN-S's internal review of the Métis Knowledge Study. Denison suggested an alternative meeting date, owing to a timing conflict.
Dec. 19, 2023 Meeting	Denison and Métis Nation - Saskatchewan met to discuss the status of the Métis Knowledge Study, the path forward with respect to responding to the MN-S draft EIS technical comment responses, study consideration in the final EIS, and the creation of the previously discussed Joint Working Group 'JWG'.
Dec. 19, 2023 Email	As a follow up to the meeting between Denison and Métis Nation - Saskatchewan to discuss the status of the Métis Knowledge Study and the path forward with respect to responding to the MN-S draft EIS technical comment responses and other topics, Denison confirmed it was updating the EIS with pertinent information from the Métis Knowledge Study, and was committed to working together in a fashion recommended by the MN-S on a go-forward basis with respect to a Joint Working Group or other mechanisms with respect to ongoing engagement activities.
<b>2024</b>	
Jan. 17, 2024 Email	Denison informed Métis Nation - Saskatchewan of the incorporation of information from the Métis Knowledge Study into the environmental impact statement for the Wheeler River Project. Denison proposed meeting to discuss with MN-S the process by which MN-S would review the use of the MKS information in the EIS
Jan. 18, 2024 Phone Call	In a phone call discussion between Denison and Métis Nation - Saskatchewan, the two parties discussed the process by which the MN-S would review Denison's use of the information in the Métis Knowledge Study in the environmental impact statement for the Wheeler River Project.
Jan. 22, 2024 Email	Following a recent phone conversation in which Denison and Métis Nation - Saskatchewan discussed a process by which MN-S would Denison's use of Métis Knowledge Study information in the environmental impact statement for the Wheeler River Project, Denison provided for review by MN-S, sections of the EIS in which MKS information was incorporated.
Feb. 1, 2024 Meeting	In a meeting between Denison and Métis Nation - Saskatchewan, Denison outlined the approach taken to protecting confidentiality while incorporating the Métis Knowledge Study into the environmental impact statement for the Wheeler River Project.
Feb. 02, 2024 Email	Denison emailed Métis Nation - Saskatchewan to provide a recap of their recent discussion regarding the use of Métis Knowledge Study information in the environmental impact statement for the Wheeler River Project. Denison requested an update on the status of MN-S's review of the use of this information. MN-S provided status update and indicated their intended timeline in which they planned to complete their review.
Feb. 5, 2024 Email	Following their review of the use of Métis Knowledge Study information in the environmental impact statement for the Wheeler River Project, Métis Nation - Saskatchewan informed Denison that they had no concerns regarding the handling of private and confidential information. Denison confirmed receipt and enquired as to the status of next steps in terms of establishing a timeline for the joint working group for the Wheeler River Project.

Date/Method	Summary
Feb. 26, 2024 Email	Denison followed up to their previous email to Métis Nation - Saskatchewan to enquire as to the status of next steps with respect to the joint working group.
Mar. 07, 2024 Email	In a follow up to their previous attempt, Denison emailed Métis Nation - Saskatchewan to discuss the advancement of the joint working group. Following a response from MN-S, Denison indicated their willingness to support these efforts in accordance with direction from MN-S.
Mar. 19, 2024 Email	Métis Nation - Saskatchewan emailed Denison to provide an update on the status of the joint working group, stating that they are working on developing a terms of reference framework for the purpose of having both Regions (NR-1 and NR-3) ready for negotiations.
Mar. 23, 2024	Métis Nation - Saskatchewan provided a draft terms of reference framework to Denison in relation to the joint working group for the Wheeler River Project, outlining the purpose of the JWG as well as particulars.
Apr. 10, 2024 Email	Further information was exchanged between Denison and the MNS regarding refinement of the process for the JWG.
Apr. 15, 2024 Email	Métis Nation - Saskatchewan emailed Denison to suggest further refinement to the terms of reference for the joint working group in relation to the Wheeler River Project.
Apr. 19, 2024 Email	Denison emailed Métis Nation - Saskatchewan providing an updated terms of reference of the joint working group.
Apr. 25, 2024 Email	Following their previous email containing edits to the terms of reference pertaining to the joint working group, Denison emailed Métis Nation - Saskatchewan to request feedback.
May 01, 2024 Mail Out	Denison sent MN-S Director of Environment a project update package that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene.
May. 01, 2024 Email	After Denison requested feedback from Métis Nation - Saskatchewan, pertaining to the joint working group and amended terms of reference, MN-S indicated that they continued to review.
May. 03, 2024 Email	Métis Nation - Saskatchewan provided Denison with adjustments made to the terms of reference for the joint working group.
May 06, 2024 Email	Denison confirmed that they accepted the changes previously sent through by Métis Nation - Saskatchewan on the terms of reference for the joint working group and requested a discussion pertinent to moving forward with the coordination of the first meeting.
May 10, 2024 Email	Métis Nation - Saskatchewan informed Denison that the terms of reference for the joint working group were moving through the appropriate approval process. MN-S also informed Denison of the MN-S contact moving forward for communication pertinent to the JWG.
May 17, 2024 Email	Denison provided to Métis Nation - Saskatchewan documents pertinent to the finalization of next steps for the JWG between Denison and MN-S, following MN-S's indication of a new primary contact for matters relating to the JWG.
Jun. 13, 2024 Email	Denison contacted the Métis Nation – Saskatchewan requesting an update on the status of finalizing next steps for the JWG between Denison and MN-S.



Date/Method	Summary
Jun. 18, 2024 Email	In response to Denison's request for an update on the status of finalizing next steps of the JWG, Métis Nation – Saskatchewan informed Denison that more information would be forthcoming.
Jul. 10, 2024 Email	Métis Nation - Saskatchewan confirmed with Denison that next steps for the Joint Working Group would be established following an upcoming meeting between Denison and MN-S leadership.
Jul. 30, 2024 Meeting	Denison and Métis Nation – Saskatchewan leadership meeting on July 30, 2024 which included discussion of next steps for the JWG and preliminary discussions regarding potential commercial negotiations with respect to the Project
Aug. 27, 2024 Email	Following the Denison and Métis Nation – Saskatchewan leadership meeting, Denison requested an update from MN-S on the status of work set out in the Joint Working Group.
Aug. 29, 2024 Email	In response to Denison's request, Métis Nation – Saskatchewan requested an update as to the status of Denison's response to a separate draft agreement and workplan (to that of the Joint Working Group) which had been put forward by MN-S in relation to MN-S's desire to undertake commercial and consent-based negotiations in respect of the Project (the "Negotiation Protocol").
Aug. 30, 2024 Email	In response, Denison informed Métis Nation – Saskatchewan that they were reviewing the Negotiation Protocol. Denison further shared their willingness to move forward with consultation meetings in accordance with the Joint Working Group framework, should MN-S be interested in doing so. Denison reaffirmed their willingness to consult with MN-S in whichever manner MN-S preferred, and requested that MN-S confirm their preferred process for consultation.
Aug. 30, 2024 Email	Métis Nation – Saskatchewan specified that, prior to continuing consultation meetings with Denison, they required clarity from Denison on the Negotiation Protocol. Once this was clarified, MN-S stated their preference was for consultation with Denison to continue in parallel to the process provided in the Negotiation Protocol.
Sep. 5, 2024 Email	Denison responded to Métis Nation- Saskatchewan and confirmed that Denison remained willing to continue consulting with MN-S in a manner respectful of their stated preference. Denison further communicated an openness to consult with MN-S, if MN-S was interested in doing so, in the manner previously agreed to under the JWG framework while their review of the Negotiation Protocol was underway.
Sep. 16, 2024 Email	In response, Métis Nation – Saskatchewan communicated that ongoing consultation with Denison was not conditional on Denison agreeing to the Negotiation Protocol, and they were seeking clarity as to whether Denison would engagement in such discussions.
Sep. 18, 2024 Email	In response, Denison reaffirmed that they remained ready to continue consultation, regardless of the status of negotiations, but would follow the direction of Métis Nation – Saskatchewan in this regard. Denison indicated it was their understanding that MN-S required clarity on a consent-based process before defining the composition of the Joint Working Group and continuing consultation on the same. Denison further confirmed they recently provided comments to MN-S on the Negotiation Protocol, and that they remained ready and willing to continue parallel consent-based discussions.

Date/Method	Summary
Sep. 19, 2024 Email	Métis Nation – Saskatchewan provided Denison with details on the processes contemplated in the Negotiation Protocol and their connection to the Joint Working Group.
Sep. 22, 2024 Email	Denison emailed Métis Nation – Saskatchewan with respect to advancing the Negotiation Protocol.
Oct. 8, 2024 Email	Métis Nation – Saskatchewan emailed Denison with respect to advancing the Negotiation Protocol.
Oct. 10, 2024 Email	Denison emailed Métis Nation - Saskatchewan with respect to advancing the Negotiation Protocol.
Oct. 25, 2024 Email	Denison emailed Métis Nation – Saskatchewan confirming Denison's readiness to proceed with the Joint Working Group and further consultations as soon as MN-S is interested in doing so.
Nov. 01, 2024 Letter	Denison mailed to all interested parties' letters of notice to share the status of the Environmental Impacts statement per the provincial regulatory process.
Nov. 08, 2024 - Email	Denison contacted Métis Nation - Saskatchewan to provide notification of the status of the EIS for the Wheeler River Project as part of Federal and Provincial regulatory processes.
Dec. 06, 2024 - Email	Métis Nation – Saskatchewan emailed Denison to continue discussions about the Joint Working Group and to discuss next steps for finalizing the JWG Terms of Reference.
Dec. 16, 2024 - Email	Denison and Métis Nation – Saskatchewan discussed plans for a kick-off meeting for the Joint Working Group.
<b>2025</b>	
Jan. 07, 2025 - Email	Denison emailed Métis Nation—Saskatchewan to follow up on plans for a kick-off meeting for the Joint Working Group.
Feb. 20, 2025 - Email	Denison and Métis Nation – Saskatchewan continued to plan a kick-off meeting for the Joint Working Group. MN-S shared with Denison communication that had occurred between MN-S and the Saskatchewan Ministry of Environment with respect to Wheeler River.
Mar. 03, 2025 - Email	Denison and Métis Nation - Saskatchewan continued discussion about next steps for the kick-off meeting of the Joint Working Group.
Mar. 13, 2025 - Email	Denison indicated that they were reviewing the information provided by Métis Nation - Saskatchewan regarding communication with the Saskatchewan Ministry of Environment and indicated the importance of Denison and MN-S discussing the details outlined. Denison and MN-S continued planning engagement as part of the Joint Working Group.
Mar. 14, 2025 - Email	Métis Nation - Saskatchewan and Denison continued to plan a kick-off meeting for the Joint Working Group. MN-S requested Denison provide potential dates.
Mar. 19, 2025 - Email	Denison and Métis Nation - Saskatchewan continued planning the Joint Working Group kick-off meeting. Denison provided MN-S with potential meeting dates for late March or early April, as requested. Denison requested MN-S share their perspective on the scope of engagement of the JWG meeting

Date/Method	Summary
Mar. 31, 2025 – Letter	The MN-S notified the CNSC that they had outstanding issues in relation to the Project and the associated process. Generally, the issues raised were: (i) concerns regarding stigma, contamination and residual impacts, (ii) basement rock permeability, (iii) losses to Métis title, the value of the uranium resource, and the socio-economic value through the extraction of that resource, (iv) effects on harvesting/fish through impacts to Whitefish and Russel Lake, (v) monitoring of ongoing impacts, and (vi) the consent process
Apr. 02, 2025 - Email	As a follow up to their previous email, Denison requested to connect with Métis Nation - Saskatchewan to discuss potential adjusted meeting in late April or early May for the Joint Working Group.
Apr. 02, 2025 - Email	Métis Nation - Saskatchewan provide Denison with dates in which the Joint Working Group meeting could be scheduled.
Apr. 09, 2025 - Email	Denison and Métis Nation - Saskatchewan finalized a meeting date and time for the preliminary Joint Work Group meeting.
Apr. 11, 2025 - Email	Métis Nation - Saskatchewan identified to Denison their intended scope of discussion for the upcoming meeting.
Apr. 17, 2025 Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.
Apr. 28, 2025 - Email	Denison and Métis Nation - Saskatchewan discussed logistics pertaining to the upcoming Joint Working Group meeting.
Apr. 29, 2025 - Email	Per Denison's request, Métis Nation - Saskatchewan provided Denison with documentation in advance of the upcoming Joint Working Group meeting.
Apr. 30, 2025 - Meeting	Denison met with Métis Nation - Saskatchewan as part of the Joint Working Group to discuss outstanding Issues in relation to the Wheeler River Project.
May. 05, 2025 - Letter	Denison provided a letter to the Saskatchewan Ministry of Environment, providing its perspective in relation to issues raised by Métis Nation - Saskatchewan to the SkMOE regarding engagement between Denison and MN-S and other matters for the Wheeler River Project.
Jun. 03, 2025 - Letter	Denison provided Métis Nation - Saskatchewan with a letter summarizing the key points from the JWG meeting discussion and provided a path forward for addressing the matters discussed. Denison also provided additional information in response to certain concerns expressed by the MN-S regarding the Project.
July 31, 2025 Letter	The MN-S responded to Denison's letter, indicating these issues remained unresolved. The MN-S shared that they felt Denison's and the Crown's engagement to be insufficient, and requested additional information on basement rock permeability, for Denison to confirm their commitment to collaborative monitoring, and for Denison to confirm the details of the socioeconomic assessment considerations.

## Appendix A-10: Key Engagement with Ya'thi Néné Lands and Resources Office

Date/Method	Summary
<b>2019</b>	
Mar. 18, 2019 Letter	Denison received correspondence from YNLR directing Denison to undertake engagement and communication solely with YNLR for the purposes of any activities requiring approval actions, such as an EA.
Jun. 5, 2019 Letter	During the CNSC Public Review period for the Technical Proposal and Project Description for the Project, Denison sent a letter to YNLR advising them about the Public Review period and offering them the opportunity to raise any questions or concerns to Denison staff and / or the regulators, with a specific focus on the potential exercising of Indigenous and / or Treaty Rights within the Project area.
Jun. 14, 2019 Meeting	Denison staff and the Executive Director for YNLR had an introductory meeting about the Project. An offer to meet to provide a more formal presentation on the Project was extended to YNLR.
Jun. 17 and 18, 2019 Meeting	Email correspondence to organize the meeting; then Denison met with YNLR regarding the Project Description for the Project and provided an overview of the Project, prior to YNLR submitting comments on the Project Description.
Jul. 17, 2019 Letter	As a follow up to YNLR submission to the CNSC on the Project Description, Denison sent a letter to YNLR indicating interest in developing a relationship, in addition to better understanding potential Indigenous and / or Treaty rights being undertaken by YNLR community members in or around the Project area.
Jul. 31, 2019 Meeting	Denison and staff from YNLR met to provide an overview of the Project. A follow up email was sent by Denison to confirm that the notes accurately reflected the meeting, which were confirmed by YNLR.
Sep. 5, 2019 Email	Denison sent an email to YNLR to request a meeting with their leadership, at the earliest convenience.
Sep. 23, 2019 Email	As part of the planning process for the upcoming meeting with the Ya'thi Néné First Nation Chiefs, the Executive, and the staff, Denison and YNLR exchanged a series of emails for planning purposes.
Oct. 3, 2019 Meeting	Denison staff attended and presented to the Ya'thi Néné First Nation Chiefs, the Executive Board Members, and the staff, providing a detailed overview of the Project.
Oct. 7&15, 2019 Email	As a follow up to the meeting held with the Ya'thi Néné First Nation Chiefs, the Board of Directors, and the staff, Denison sent an email with the presentation and the notes, seeking confirmation they accurately reflected the meeting. Approval was provided by YNLR on October 15, 2019.
Dec. 6, 2019 Letter	As part of the information-sharing process by Denison with Interested Parties regarding opportunities associated with the Project, Denison provided YNLR with a procurement forecast for 2020. The YNLR responded with their appreciation.
Dec. 13, 2019 Meeting	Denison and YNLR staff met to discuss: 1) General exploration activities occurring in 2020; 2) The draft application shared in advance with YNLR regarding the advanced Exploration activities for the Project, seeking their feedback

Date/Method	Summary
	and 3) Next steps on engagement with YNLR for the Project EA, including assessing how Denison could support YNLR to complete their land use dataset, and provide a site tour in 2020.
Dec. 17&31, 2019 Email	As a follow up to the meeting with YNLR regarding the advanced Exploration Permit information, Denison provided copies of the presentation and the notes to confirm acceptability.
<b>2020</b>	
Mar. 19, 2020 Letter	A letter from Denison Mines to inform YNLR of the temporary postponement of the EA for the Project.
May 6, 2020 Phone Call	Phone conversation between Denison's Corporate Social Responsibility Manager and Ya'thi Néné Land and Resource Office's Executive Director.
Jun. 4&12, 2020 Emails	In response to the Denison field program update, YNLR contacted Denison regarding more particulars related to COVID-19 safety protocols. In response, Denison provided further information as requested. The YNLR provided Denison with a letter regarding the employment of Athabasca Basin residents during COVID-19.
Nov. 12, 2020 Letter	A letter from Denison Mines to inform YNLR of the updated activities surrounding the EA for the Project.
<b>2021</b>	
Jan./Feb. 2021 Emails	Ongoing process discussions between Denison and YNLR.
Jan. 20, 2021 Letter	Denison provided correspondence to inform YNLR about the Project EA Restart.
Apr. 5, 2021 Agreement (Engagement)	Denison and YNLR entered into a Letter Agreement related to engagement processes for the Project whereby Denison would ensure YNLR had the capacity to undertake mutually agreed-upon activities.
Apr. 8&20, 2021 Emails	Discussion between Denison and YNLR to schedule a planning meeting for community and leadership meetings in accordance with the agreed-upon engagement process. Leadership meeting requested to be postponed to May 2021.
Apr. 22, 2021 Virtual Meeting	Denison and the staff of YNLR met to provide an update on the Project. This included information about the EA restart along with the change to the freeze wall configuration.
Apr. 22&26, 2021 Emails	Correspondence between Denison and YNLR regarding engagement activities. Recommendation from YNLR to postpone the engagement leadership meeting until after the Hatcher Lake First Nation election, in May 2021; and confirming leadership of Fond du Lac First Nation.
May 3&27, 2021 Email	Ya'thi Néné Lands and Resources Office confirmed Denison's contribution to the newsletter. Denison contributed to the spring newsletter in order to raise awareness about the Project and upcoming virtual engagement sessions.
May 11, 2021 Email	Correspondence between Denison and YNLR regarding community meeting planning and prizes for the upcoming engagement sessions.

Date/Method	Summary
Jun. 11&21, 2021 Jul. 5&9, 2021 Email	Denison and YNLR discuss rescheduling the postponed leadership meetings and a basin-wide community meeting, due to the Hatchet Lake First Nation elections in May 2021 – later confirmed to be third week of July 2021.  Subsequently deferred until end of August 2021, owing to the evolving situation of COVID in the region.
Jun. 17, 2021 Email	Following the introductory meeting in April 2021 with YNLR technical staff, Denison shared the meeting notes seeking confirmation of accuracy.
Aug. 6, 2021	Update from YNLR on a delay to planned leadership and community meetings as a result of the sudden passing of the Chief of the Black Lake First Nation.
Aug. 11, 2021 Emails	Denison and YNLR entered into a Letter Agreement outlining a mutually agreeable process by which the YNLR would author a report for Denison to consider and include, as appropriate, into the EIS. This included a process by which the YNLR would also pre-review the pertinent sections of the EIS in relation to their authored report to comment in respect of Denison's inclusion of the YNLR-authored materials.
Sep. 1, 2021 Email	Planning discussions between Denison and YNLR to schedule leadership and community meetings for September 2021.
Sep. 17, 2021 Email	Prior to the planned engagement meetings with the Athabasca Basin region planned through YNLR, YNLR reviewed the planned follow-up survey. Denison received no comments based on this review.
Sep. 24, 2021 Email	Denison provided promotional material to YNLR in advance of upcoming community meeting for sharing via their communication channels, as agreed to between Denison and YNLR.
Sep. 29, 2021	As per the agreed-upon process set between Denison and the Ya'thi Néné Land and Resources Office regarding engagement activities for the Wheeler River Project, Denison hosted a virtual meeting for the leadership of the Athabasca Basin communities where the overall project, alternatives assessments undertaken over the years and Valued Components were discussed. Representatives attended from: Black Lake First Nation, Fond du Lac First Nation, Hatchet Lake First Nation, Northern Hamlet of Stony Rapids, Northern Settlement of Camsell Portage, Northern Settlement of Wollaston Lake, Uranium City, and the Ya'thi Néné Land and Resource Office
Sep. 29, 2021 Virtual Meeting	In accordance with an agreed-upon approach set between Denison and YNLR regarding engagement activities for the Athabasca Basin communities, Denison undertook a virtual meeting for residents. The presentation focused on the Project, the alternatives assessed over the years, and the VCs for the Project. The virtual meeting was supported by a number of various representatives from YNLR. Approximately seven people attended. The CNSC had planned to attend but cancelled due to circumstances. A representative from Province of Saskatchewan attended.
Sep. 30, 2021 Email	As a follow up to the September 29, 2021, meeting between Denison and the leadership representatives from the Athabasca Basin communities, Denison sent an email correcting an error on one slide.
Oct. 1, 2021 Email	Denison provided YNLR with a draft copy of meeting notes taken from the September 29, 2021, meeting with the Athabasca Basin leaders. A request was made to confirm accuracy of



Date/Method	Summary
	the notes by October 8, 2021, or to follow an approach where no response by October 8, 2021, indicated acceptability. Denison did not receive a response by October 8, 2021.
Nov. 2, 2021 Email	Ya'thi Néné Lands and Resources Office notified Denison that, due to unforeseen circumstances, the information to be provided to Denison in respect of the Project was expected to be delayed.
Nov. 22, 2021 Newspaper Advertisement	Denison put an advertisement into the regularly occurring YNLR newsletter to thank participants for attending the virtual public meeting earlier in the fall, 2021.
Nov. 30, 2021 Newspaper Advertisement	Denison placed an advertisement in the YNLR Newsletter thanking the participants from the Athabasca Basin communities for participating in Denison's virtual meeting on September 29, 2021.
<b>2022</b>	
Jan. 19, 2022 Letter	Ya'thi Néné Lands and Resources Office provided review and comments on Denison's Land Use Memo, developed by Intergroup regarding the Athabasca Denesųliné. This was part of the agreed-upon letter agreement between the parties pertaining to YNLR participating in the Wheeler River Project Environmental Assessment process. The YNLR also provided a draft report written by them with respect to their understanding of land use activities in the vicinity of the Wheeler River Project.
Mar. 15, 2022 Report	Ya'thi Néné Land and Resource Office, through email and email attachment, supplied Denison with the non-confidential report that may be used in the EIS, entitled "An Exploration of Recorded Athabasca Denesųliné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of Denison Mines Wheeler River Project". YNLR stated their support of including this report in the EIS.
May 15, 2022 Email	Denison emailed Ya'thi Néné Lands and Resources regarding the coordination of a meeting with YNLR Board and Athabasca Leadership to discuss preliminary effects assessment findings, mitigation measures, and outcomes relating to the Wheeler River Project. Denison was seeking confirmation of the approach and proposed timing from the YNLR to move the meeting forward.
2022 Draft EIS	As per the agreed-upon process for review and information-sharing regarding the Project EIS, Denison provided, and YNLR reviewed and responded to, Sections 3 and 11 of the draft EIS, prior to filing.
Jul. 6, 2022 Email	Ya'thi Néné Lands and Resource Office indicated that they are in the process of reviewing the draft sections of the Environment Impact Statement.
Jul. 29, 2022 Email	Ya'thi Néné Lands and Resource Office provided a letter, as an email attachment, providing feedback in response to draft sections of the Environment Impact Statement sent to them by Denison.
<b>2023</b>	
Jan. 23, 2023 Community Meeting	As part of engagement activities in the Athabasca Basin, a meeting was held in Black Lake First Nation, which was jointly coordinated between Ya'thi Néné Lands and Resource Office and Denison Mines. In addition to providing an overview on exploration activities and the recently signed Exploration Agreement, Denison also provided an update to community members pertaining to the Wheeler River Project. Live translations were carried out throughout the

Date/Method	Summary
	presentation. The presentation pertained to a Project Components, Project technologies, Project schedule, the regulatory process, and the environmental impact assessment process and outcomes. Booklets were available for community members to take home that included, but was not limited to, detail on project components, project technologies, regulatory process, project schedule and the EIS including valued components, significance findings, monitoring, and mitigation. A one-page summary on the WRP was available for community members to take home in English, Cree, and Dene.
Jan. 24, 2023 Community Meeting	As part of engagement activities in the Athabasca Basin, a meeting was held in Uranium City, which was jointly coordinated between Ya'thi Néné Lands and Resource Office and Denison Mines. In addition to providing an overview on exploration activities and the recently signed Exploration Agreement, Denison also provided an update to community members pertaining to the Wheeler River Project. Live translations were carried out throughout the presentation. The presentation pertained to a Project Components, Project technologies, Project schedule, the regulatory process, and the environmental impact assessment process and outcomes. Booklets were available for community members to take home that included, but was not limited to, detail on project components, project technologies, regulatory process, project schedule and the EIS including valued components, significance findings, monitoring, and mitigation. A one-page summary on the WRP was available for community members to take home in English, Cree, and Dene.
Jan. 24, 2023 Community Meeting	As part of engagement activities in the Athabasca Basin, a meeting was held in Fond du Lac First Nation, which was jointly coordinated between Ya'thi Néné Lands and Resource Office and Denison Mines. In addition to providing an overview on exploration activities and the recently signed Exploration Agreement, Denison also provided an update to community members pertaining to the Wheeler River Project. Live translations were carried out throughout the presentation. The presentation pertained to a Project Components, Project technologies, Project schedule, the regulatory process, and the environmental impact assessment process and outcomes. Booklets were available for community members to take home that included, but was not limited to, detail on project components, project technologies, regulatory process, project schedule and the EIS including valued components, significance findings, monitoring, and mitigation. A one-page summary on the WRP was available for community members to take home in English, Cree, and Dene.
Jan. 25, 2023 Community Meeting	As part of engagement activities in the Athabasca Basin, a meeting was held in Hatchet Lake First Nation, which was jointly coordinated between Ya'thi Néné Lands and Resource Office and Denison Mines. In addition to providing an overview on exploration activities and the recently signed Exploration Agreement, Denison also provided an update to community members pertaining to the Wheeler River Project. Live translations were carried out throughout the presentation. The presentation pertained to a Project Components, Project technologies, Project schedule, the regulatory process, and the environmental impact assessment process and outcomes. Booklets were available for community members to take home that included, but was not limited to, detail on project components, project technologies, regulatory process, project schedule and the EIS including valued components, significance findings, monitoring, and mitigation. A one-page summary on the WRP was available for community members to take home in English, Cree, and Dene.
Jan. 27, 2023 Email	Ya'thi Néné Lands and Resource Office requested from Denison a copy of the presentation that was provided to Athabasca Basin Communities during the January 2023 engagement meetings in accordance with the Exploration Agreement.

Date/Method	Summary
Jul. 18, 2023 Meeting	Denison met with Ya'thi Néné Lands and Resource Office at their Saskatoon office to further discuss and understand YNLR's comments on the Environmental Impact Statement. Denison and YNLR discussed agreeing upon a path forward in which Denison would respond to YNLR's EIS comments.
Jul. 20, 2023 Letter	In response to the discussion during the previous meeting pertaining to EIS comments, Ya'thi Néné Lands and Resource Office transmit a letter, via email, to Denison, which outlined YNLR's preferred approach in which Denison would respond to YNLR's EIS comments.
Aug. 28, 2023 Email	After Ya' thi Néné Lands and Resource Office requested to meeting to discuss the Wheeler River Project EIS, Denison requested clarification on anticipated topics of discussion, to which YNLR stated that an agenda would be provided.
Aug. 31, 2023 Email	In response to Ya' thi Néné Lands and Resource Office's request to meet to discuss the Wheeler River Project EIS, Denison informed YNLR that they were unable to meet at the proposed meeting time. Denison requested a phone conversation to clarify the purpose of the meeting, given that Denison was directing resources to respond to YNLR's EIS comments, as requested in YNLR's letter dated July 20, 2023, which outlined a path forward.
Nov. 2, 2023 Site Visit	After an attempted site tour of the Wheeler River Project Site earlier in the fall, with the Ya' thi Néné Lands and Resource Office and members of surrounding Athabasca Basin communities, in which the plane was unable to land due to weather conditions, Denison facilitated a Wheeler River Project site tour with YNLR.
Nov. 23, 2023 Letter	Denison provided responses to the Ya' thi Néné Lands and Resource Office's comments made on the draft Environmental Impact Statement for the Wheeler River Project.
Nov. 27, 2023 Email	The Ya' thi Néné Lands and Resource Office confirmed receipt of Denison's response to YNLR's comments made on the draft Environmental Impact Statement for the Wheeler River Project.
Dec. 18, 2023 Email	As a follow up to a meeting with Ya' thi Néné Lands and Resource Office, Denison confirmed its willingness to coordinate a technical meeting on cumulative effects between Denison's technical experts and YNLR's technical experts. This meeting is expected to occur in early 2024.
<b>2024</b>	
Feb. 02, 2024 Letter	After responding to the Ya'thi Néné Lands and Resource Office comments on the draft Environmental Impact Statement for the Wheeler River Project, YNLR provided a letter to Denison outlining their perspective on the status of comments.
Feb. 05, 2024 Email	Denison and Ya'thi Néné Lands and Resource Office worked to coordinate a meeting to discuss a path forward following receipt of YNLR's letter outlining their perspective on the status of comments following Denison's technical responses.
Feb. 21, 2024 Email	In advance of their upcoming technical meeting, Denison and the Ya'thi Néné Lands and Resource Office exchanged materials to be used in support of the meeting.
Feb. 22, 2024 Meeting	In support of resolution of issues raised by the Ya' thi Néné Lands and Resource Office on the draft environmental impact statement for the Wheeler River Project, Denison and the YNLR held an in person technical meeting focused on cumulative effects, with both Denison's and YNLR's technical experts in attendance. Both YNLR and Denison provided presentations

Date/Method	Summary
	centered around cumulative effects methodology, and YNLR provided an overview on environmental monitoring and management with reference to Denison's responses to YNLR comments on the environmental impact statement for the Wheeler River Project
Feb. 23, 2024 Email	Following their recent technical meeting, Denison emailed the Ya' thi Néné Lands and Resource Office and provided to YNLR copies of: i) the meeting agenda, ii) Denison's presentation, iii) The Caribou Management Framework that was filed with the revised draft environmental impact statement for the Wheeler River Project, iv) the WRP draft EIS Section 16- Summary of Monitoring & Follow-up Programs for Wheeler River, and v) Denison's commitments register updated as of filing of the draft EIS on February 10, 2024.
Mar. 06, 2024 Email	The Ya' thi Néné Lands and Resource Office emailed follow up questions, following their recent technical meeting.
Mar. 08, 2024 Email	Denison provided responses to the questions from the Ya' thi Néné Lands and Resource Office
Mar. 13, 2024 Letter	The Ya'thi Néné Lands and Resource Office provided Denison with comments on Denison's responses to YNLR's initial comments for the environmental impact statement for the Project.
Apr. 05, 2024 Email	After the technical meeting and the following receipt of comments from the Ya'thi Néné Lands and Resource Office, Denison provided responses to the YNLR.
Apr. 30, 2024 Email	Denison requested an update on the status of comment resolution from Ya'thi Néné Lands and Resource Office.
May 01, 2024 Mail Out	Denison sent the YNLR Executive Director a project update packages that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene. Denison additionally provided multiple project update packages to the YNLR for distribution to communities in the Athabasca Basin.
Jun. 7, 2024 Email	As part of the collaborative facilitation of community engagement meetings in Athabasca Basin communities, the Ya'thi Néné Lands and Resource Office informed Denison of the cancellation of the planned upcoming community meeting in Fond du Lac First Nation, owing to unforeseen circumstances.
Jun. 10, 2024 Community Meeting Stony Rapids	As part of engagement activities in the Athabasca Basin, a meeting was held in Stony Rapids, which was jointly coordinated between the Ya'thi Néné Lands and Resource Office and Denison Mines. Engagement materials were developed with consideration of YNLR feedback and focused largely on introducing the in-situ recovery mining method at a conceptual level. Specifics pertaining to both the Wheeler River Project and Tthe Heldeth Túé were then shared with community members and included Project stage, Project components, and mitigation and monitoring, and future employment and business opportunities. In addition to Denison's and the YNLR's participation in these meetings, members of the Saskatchewan Ministry of Environment were also in attendance, both of which presented their own material as part of the community meeting. Live translations were carried out throughout the presentation and associated dialogue, and a one-page summary of the Wheeler River Project was available, in hard copy, in English, Cree, and Dene.
Jun. 10, 2024 Community Meeting Black Lake	As part of engagement activities in the Athabasca Basin, a meeting was held in Black Lake First Nation, which was jointly coordinated between the Ya'thi Néné Lands and Resource Office and Denison Mines. Engagement materials were developed with consideration of YNLR feedback

Date/Method	Summary
	and focused largely on introducing the in-situ recovery mining method at a conceptual level. Specifics pertaining to both the Wheeler River Project and Tthe Heldeth Túé were then shared with community members and included Project stage, Project components, and mitigation and monitoring, and future employment and business opportunities. In addition to Denison's and the YNLR's participation in these meetings, members of the Saskatchewan Ministry of Environment were also in attendance, both of which presented their own material as part of the community meeting. Live translations were carried out throughout the presentation and associated dialogue, and a one-page summary of the Wheeler River Project was available, in hard copy, in English, Cree, and Dene.
Jun. 11, 2024 Community Meeting Uranium City	As part of engagement activities in the Athabasca Basin, a meeting was held in Uranium City, which was jointly coordinated between the Ya'thi Néné Lands and Resource Office and Denison Mines. Engagement materials were developed with consideration of YNLR feedback and focused largely on introducing the in-situ recovery mining method at a conceptual level. Specifics pertaining to both the Wheeler River Project and Tthe Heldeth Túé were then shared with community members and included Project stage, Project components, and mitigation and monitoring, and future employment and business opportunities. In addition to Denison's and the YNLR's participation in these meetings, members of the Saskatchewan Ministry of Environment were also in attendance, both of which presented their own material as part of the community meeting. Live translations were carried out throughout the presentation and associated dialogue, and a one-page summary of the Wheeler River Project was available, in hard copy, in English, Cree, and Dene. This meeting was attended virtually by residents of Camsell Portage.
Jun. 13, 2024 Community Meeting Hatchet Lake	As part of engagement activities in the Athabasca Basin, a meeting was held in Hatchet Lake First Nation, which was jointly coordinated between the Ya'thi Néné Lands and Resource Office and Denison Mines. Engagement materials were developed with consideration of YNLR feedback and focused largely on introducing the in-situ recovery mining method at a conceptual level. Specifics pertaining to both the Wheeler River Project and Tthe Heldeth Túé were then shared with community members and included Project stage, Project components, and mitigation and monitoring, and future employment and business opportunities. In addition to Denison's and the YNLR's participation in these meetings, members of the Saskatchewan Ministry of Environment were also in attendance, both of which presented their own material as part of the community meeting. Live translations were carried out throughout the presentation and associated dialogue, and a one-page summary of the Wheeler River Project was available, in hard copy, in English, Cree, and Dene.
Jun. 19, 2024 Letter	The Ya'thi Néné Lands and Resources Office provided a letter to update Denison on the status of YNLR comments made on the draft EIS for the Wheeler River Project following measures taken to date in pursuit of comment resolution. YNLR indicated that they do not consider any comments made on the draft and revised EIS resolved
June 28, 2024 Letter	Denison provided a response to the Ya'thi Néné Lands and Resources Office, clarifying their understanding of the endeavors undertaken in pursuit of comment resolution, and seeking clarity from the YNLR in relation to the process by which the YNLR desires to have undertaken in order to move forward toward the resolution of outstanding concerns.
Nov. 01, 2024 - Letter	Denison mailed to all interested parties' letters of notice to share the status of the Environmental Impacts statement per the provincial regulatory process.

Date/Method	Summary
Nov. 08, 2024 - Email	Denison informed the Ya'thi Néné Lands and Resources Office of the advancement of the environmental impact statement for the Wheeler River Project and associated next steps.
Nov. 14, 2024 - Meeting	The Ya'thi Néné Lands and Resources Office and Denison met to discuss the resolution of comments on the Environmental Impact Statement for the Wheeler River Project. YNLR requested the documents discussed during this meeting.
Nov. 18, 2024 - Email	Following a recent meeting, Denison provided to the Ya'thi Néné Lands and Resources Office an overview of the meeting and key topics discussed and provided the drafted program documents requested by YNLR.
Dec. 17, 2024 - Email	The Ya'thi Néné Lands and Resources Office sent an email to Denison summarizing that they were satisfied with responses to several IRs and remain optimistic that further review and anticipated responses from the provincial government and CNSC will address the remaining items soon.
<b>2025</b>	
Jan. 07, 2025 - Email	Denison sent an email to Ya'thi Néné Lands and Resources Office to follow up on their meeting offer to discuss in terms of the detailed development of the environmental monitoring programs and associated plans.
Apr. 02, 2025 - Email	Denison shared information on the advancement of the previously shared monitoring plans with Ya' Thi Néné Lands and Resources and offered to meet to engage on these materials to support YNLR's review and comment.
Apr. 17, 2025 Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.
May. 05, 2025 - Email	Ya' Thi Néné Lands and Resources requested that Denison provide information on any further development of the monitoring plans previously provided. Denison indicated that there has been no further material development.



## Appendix A-11: Key Engagement with Peter Ballantyne Cree Nation

Date/Method	Summary
<b>2023</b>	
Mar. 6, 2023 Email	Peter Ballantyne Cree Nation provided Denison with the comments PBCN submitted on the Wheeler River EIS, which were sent to the Canadian Nuclear Safety Commission. PBCN requested a meeting to discuss the WRP.
Mar. 8, 2023 Email	Denison and Peter Ballantyne Cree Nation discussed the planning of a future meeting, given PBCN had submitted comments to the Canadian Nuclear Safety Commission.
Apr. 4, 2023 Email	Denison and Peter Ballantyne Cree Nation continued to work towards determining a date in which Denison could meet with PBCN. PBCN requested that the presentation focus on the Wheeler River Project.
Apr. 17, 2023 Email	Denison and Peter Ballantyne Cree Nation continued to work towards determining a date in which Denison could meet with PBCN. A meeting date was agreed upon by PBCN and Denison.
May 2, 2023 Email	Denison and Peter Ballantyne Cree Nation established an agreed upon agenda for their upcoming meeting. PBCN and Denison confirmed attendees.
May 16, 2023 Meeting	Denison and Peter Ballantyne Cree Nation had a virtual meeting to discuss the Wheeler River Project. Denison provided a PowerPoint presentation and took meeting notes. It was agreed that a future meeting would be required and focused on the information PBCN could share about activities in and around the Wheeler River Project.
May 17, 2023 Email	Following a meeting with Peter Ballantyne Cree Nation, Denison sent an email summary, a copy of the presentation, and other information to PBCN. Denison and PBCN began planning to establish a date for a future meeting. Additionally, Denison requested PBCN provide available information on traditional and current land use in the project area.
May 19, 2023 Email	Peter Ballantyne Cree Nation informed Denison that PBCN had completed a request to protect confidential information with the CNSC and Denison would have access to their traditional territory map.
May 24, 2023 Email	Denison confirmed receipt of Peter Ballantyne Cree Nation's Traditional Land Use Map submitted to the CNSC.
Jun. 30, 2023 Email	After reviewing Peter Ballantyne Cree Nation's comments on the Wheeler River Project Environmental Impact Statement, Denison suggested a meeting with PBCN in order to better understand their interest and specific concerns with respect to the Wheeler River Project. Denison communicated a draft agenda for the suggested meeting which included addressing specific concerns identified by PBCN. Having reviewed PBCN's traditional territory map dated February 8, 2023, Denison additionally requested that PBCN share any information regarding traditional and current land use in the Wheeler River Project area so that Denison could prepare for a more detailed discussion.
Jul. 13, 2023 Email	Peter Ballantyne Cree Nation responded to Denison's email regarding a future meeting to address environmental impact statement comments. PBCN indicated that they would provide potential dates in the future and that PBCN would like to discuss capacity funding for Wheeler River Project engagement activities.

Date/Method	Summary
Jul. 31, 2023 Email	Following a phone discussion, Denison's legal counsel informed Peter Ballantyne Cree Nation that Denison would provide capacity funding to attend the upcoming in person meeting on August 9, 2023, in Saskatoon, in which Denison would meet to discuss with PBCN their interests and concerns in relation to the Wheeler River Project. PBCN confirmed receipt of the email.
Jul. 31, 2023 Email	Following a phone discussion, Peter Ballantyne Cree Nation emailed Denison to inform them of adjustments to the list of attendees for the upcoming meeting meant to discuss interests and concerns of PBCN in relation to the Wheeler River Project. PBCN expressed the potential need to reschedule due to the absence of an attendee.
Aug. 1, 2023 Email	Peter Ballantyne Cree Nation responded to Denison's draft agenda in advance of their meeting planned on August 9, 2023. PBCN suggested, and Denison agreed to, adjustments to the agenda.
Aug. 2, 2023 Email	Peter Ballantyne suggested, and Denison agreed to, rescheduling the August 9, 2023, meeting to September 20, 2023. PBCN then suggested additional adjustments to the meeting agenda.
Sep. 18, 2023 Email	Peter Ballantyne Cree Nation informed Denison of a change in attendees for the upcoming meeting, in which several attendees would no longer be attending in Saskatoon and would instead attend virtually.
Sep. 20, 2023 Email	Peter Ballantyne Cree Nation's legal representative and primary contact informed Denison they would not be in attendance at the scheduled afternoon meeting. PBCN confirmed with Denison that the meeting would be available virtually, to accommodate for a potential exposure of PBCN Director of Lands and Resources to Covid-19.
Sep. 20, 2023 Email	In advance of the upcoming meeting, Peter Ballantyne Cree Nation informed Denison of delays that would impact the meeting start time.
Sep. 20, 2023 Meeting	Denison met with Peter Ballantyne Cree Nation at the Ramada Hotel in Saskatoon as part of continued engagement in relation to the Wheeler River Project and Draft Environmental Impact Statement. The intent of this meeting agreed upon meeting agenda included: a) Overview of PBCN b) PBCN lands and uses in the Project area c) Denison Project Overview, and d) Denison: Responses to PBCN concerns identified in the submission of the draft EIS. Denison brought two presentations to support this meeting.
Sep. 27, 2023 Email	Denison thanked Peter Ballantyne Cree Nation for their attendance at the recent meeting on September 20, 2023, and informed PBCN that the materials that Denison committed to following up with would be completed and communicated in the coming days.
Oct. 5, 2023 Email	Peter Ballantyne Cree Nation requested, and Denison provided, an update on the materials Denison had committed to sharing during their recent meeting. Denison indicated the materials were forthcoming shortly.
Oct. 10, 2023 Email	Following a meeting between Denison and Peter Ballantyne Cree Nation, Denison emailed PBCN to provide a recap of the meeting and provide relevant materials. Denison provided PBCN with copies of the meeting notes and presentations; included in this was a presentation prepared by Denison to address the concerns raised by PBCN in its submission on the draft EIS in which, owing to time constraints, Denison was unable present during the recent meeting.

Date/Method	Summary
Oct. 20, 2023 Letter	Following a recent meeting between Peter Ballantyne Cree Nation and Denison, PBCN sent Denison a follow up letter to share PBCN's perspective on potential impacts to their Treaty and Indigenous Rights in relation to the Wheeler River Project's environmental assessment. PBCN informed Denison of their recent contact with federal and provincial regulators in which the purpose was to share their perspective on Treaty and Indigenous Rights.
Nov. 8, 2023 Phone Call	Peter Ballantyne Cree Nation left Denison a voicemail inquiring as to the status of Denison's response to the recent letter received October 20, 2023.
Nov. 8, 2023 Email	Peter Ballantyne Cree Nation sent an email to Denison alerting them of the previous voicemail and inquiring as to the status of Denison's response to the recent letter received October 20, 2023.
Nov. 8, 2023 Email	Due to Denison staff unavailability, Denison's legal counsel offered an opportunity to discuss with PBCN topics raised in PBCN's previous correspondence.
Nov. 9, 2023 Email	Denison informed Peter Ballantyne Cree Nation that Denison's legal counsel had contacted PBCN, in light of Denison staff unavailability, to discuss topics raised in PBCN's recent communication.
Nov. 22, 2023 Letter	Following Peter Ballantyne Cree Nation's letter pertinent to the previous meeting, which stated PBCN's perspective on potential impacts to Treaty and Indigenous Rights in relation to the Wheeler River Project environmental assessment, Denison provided a response, highlighting a willingness to continued engaged and to coordinate a future meeting in which Denison could receive information regarding PBCN's interests and land use in the Project area.
Nov. 29, 2023 Email	Following Denison's letter responding to Peter Ballantyne Cree Nation of November 22, 2023, Denison's legal counsel contacted PBCN's legal counsel to inform them that Denison had responded to PBCN by letter, and to inform that Denison had additionally forwarded this letter response to Provincial and Federal regulators, owing to PBCN's indication of dialogue with regulatory bodies with respect to Indigenous and Treaty Rights.
Dec. 12, 2023 Letter	Following Denison's November 22, 2023 letter to Peter Ballantyne Cree Nation, PBCN provided a letter in response in which they proposed that Denison provide them capacity funding to complete a PBCN-specific traditional land and resource uses study and report for the Project.
Dec. 13, 2023 Email	Denison confirmed receipt of the recent letter sent by Peter Ballantyne Cree Nation. Denison indicated that they would provide a response to PBCN in the near future.
<b>2024</b>	
Jan. 10, 2024 Letter	Following Peter Ballantyne Cree Nation's letter on December 13, 2023, Denison sent a letter to PBCN in which they provided a recap of engagement between PBCN and Denison, responded to concerns, requested information on land uses in the Project area, and outlined their engagement approach which included indicating a willingness to continue engagement in connection with the Project. Denison responded further noting that without information about how the Project will adversely impact PBCN land uses and rights, they were unable to determine that a traditional land and resources uses study and report for the Project was warranted.

Date/Method	Summary
May 01, 2024 Mail Out	Denison sent the Chief of PBCN a project update package that contained an annual update, a booklet of frequently asked questions and responses, and a one-page Project description in English, Cree, and Dene.
Nov. 01, 2024 - Letter	Denison mailed to all interested parties' letters of notice to share the status of the Environmental Impacts statement per the provincial regulatory process.
<b>2025</b>	
Apr. 01, 2025 - Letter	In a letter to Peter Ballantyne Cree Nation, Denison expressed interest in continuing engagement with PBCN in order to advance Denison's understanding of PBCN's history and activities in the Wheeler River Project area.
Apr. 08, 2025 - Letter	In a letter to Denison, Peter Ballantyne Cree Nation shared information with Denison pertinent to their interests around the Wheeler River Project area. PBCN expanded on their initial public comments on the EIS and indicated a desire to continue engagement with Denison.
Apr. 17, 2025 - Letter	Denison provided letters to all Interested Parties and Communities of Interest with updates on the status of the Wheeler River Project including hearing dates. Denison reiterated their commitment to communication and engagement and provided a contact for questions and feedback. Denison additionally provided sources of information under the Canadian Nuclear Safety Commission, and provided links to more information on the Wheeler River Project.
May. 13, 2025 - Letter	Denison responded to Peter Ballantyne Cree Nation's previous letter. Denison reaffirmed their interest in continuing engagement with PBCN to address public comments on the Wheeler River Project EIS and maintained their position of ensuring PBCN had suitable capacity to do so.
May. 20, 2025 - Letter	Denison received updated information from Peter Ballantyne Cree Nation in respect of the Project.
Aug. 11, 2025 Letter	Denison responded to PBCN's interests / concerns regarding water quality and freshwater resources, environmental monitoring and participation, and cultural and environmental impacts.

## 8 Appendix B

### Appendix B-1: Records of Engagement

# 9 Appendix C

Appendix C-1: ERFN Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
English River First Nation	Current use of lands and resources for traditional purposes	Interest in sharing IK and history, and integration of this information in EIS.	ROC 5 ROC 100 ROC 103 ROC 104 ROC 134 ROC 137 ROC 140 ROC 310 ROC 473 ROC 618 Draft EIS Comments	<p>As detailed in Section 3.4.2.1, English River First Nation provided a land use map dated 2017 for Denison to gain an understanding of the extent and distribution of land use in the Project area. This map is published in the Project Terms of Reference (TOR; Denison 2019). To supplement the mapping information, funding was provided to ERFN to write their own independent contribution to the EIS, with assistance from Shared Value Solutions. English River First Nation produced a draft Traditional Knowledge Study and Health and Socio-Economic Study Results document that was split and finalized into two summary reports: 1) Wheeler River Project – Summary of Health and Socio-Economic Study Results (ERFN and SVS 2022a); and 2) Wheeler River Project - Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b). The studies collectively documented baseline land use and socio- economic conditions and identified Project-related concerns and opportunities.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Denison has previously compensated a trapper potentially affected by exploration activities in and around the Project based on the potential for commercial loss, who has since passed away. This will be assessed going forward based on the potential for the Project to negatively effect commercial loss, and where appropriate, Denison will compensate accordingly.	Resolved agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Current use of lands and resources for traditional purposes	ERFN provided information about Furblocks N-18 and N-16 being amalgamated into single management by ERFN a while back, under a co-management regime.	ROC 5 ROC 134 ROC 137 ROC 140 ROC 456 ROC 618 Draft EIS Comments	<p>The EIS notes in Section 11.1.4.4.1 that Furblock N-18 and N-16 have been amalgamated under a co-management regime between the province and ERFN.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Current use of lands and resources for traditional purposes	Concern about how the Project may limit or restrict access to the area for hunters and resource users.	*Listed above in Indigenous Land and Resource Use*	<p>ROC473 contains a discussion pertinent to access, in which ERFN highlights satisfaction with the existing controls in place (i.e., Cameco's Key Lake Operation gate. Access restrictions north of the Key Lake gate mean that use is restricted to lease holders (e.g., cabin owners) and select Indigenous communities. The Project does not propose any changes to the current access to Highway 914 north of Cameco's Key Lake Operation gate.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Section 12.3.3.2.1 of the EIS describes how access north of the Key Lake gatehouse for employees of northern mines, Indigenous resource harvesters from select communities, cabin owners, and lease owners provides for controlled access to users. Access beyond the Key Lake gate is currently restricted, although some members of ERFN are provided access to	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
					the Key Lake - McArthur River mine haul road if they are on the Ministry of Environment list or have received a gate access pass. Denison has designed the security for the site in accordance with engagement outcomes with ERFN, which are to include a security gate at both the south and north location and to allow ERFN members to access areas beyond the gate.			
English River First Nation	Current use of lands and resources for traditional purposes	Concerns were shared about the potential effects of Project construction on wildlife, including possible effects on game for hunting. Noted desire to document pocket (location) for caribou calving as well as an ongoing role in the mitigation of any possible effects.	ROC 5 ROC 100 ROC 134 ROC 447 ROC 456 ROC 473 ROC 506 ROC 516 Draft EIS Comments	<p>Section 9.3.3.3.2 discusses the referenced calving habitat, which is along Fox Lake Road, well outside the Terrestrial RSA and mitigation measures for the Project (Section 9.3.5) consider the elimination and reduction of the direct and indirect disturbance of caribou in sensitive habitat and during sensitive time periods (such as calving).</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Current use of lands and resources for traditional purposes	Concern about safety of mine shaft and groundwater, specifically determination of the Project being in vicinity of underground rivers.	ROC 5 ROC 134 ROC 140 ROC 447 ROC 618 Draft EIS Comments	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface. Groundwater flow is influenced by a number of factors and, as such, varies within the LSA. Baseline information on groundwater flow rates can be found in the Geology and Groundwater section of the EIS.</p> <p>Groundwater monitoring wells will be installed at various depths and locations in and around the wellfield, as outlined in Section 2.2.1.5. The monitoring wells have a variety of purposes including groundwater sample collection, measurement of groundwater levels, and detection of changes in pressure and temperature in the groundwater environment. A detailed groundwater monitoring program will be developed as component of the environmental management system as part of the licensing and permitting process.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
English River First Nation	Current use of lands and resources for traditional purposes	Elders said after natural disasters (i.e., forest fires) it could take 35 years (to regenerate). The Project area is burnt with the exception for some non-burned patches that caribou have used. The moose are coming back slowly.	*Wildlife ROCs above* ROC 134 ROC 473 Draft EIS Comments	<p>As detailed in Section 3.4.2.1, English River First Nation provided a land use map dated 2017 for Denison to gain an understanding of the extent and distribution of land use in the Project area. This map is published in the Project Terms of Reference (TOR; Denison 2019). To supplement the mapping information, funding was provided to ERFN to write their own independent contribution to the EIS, with assistance from Shared Value Solutions. English River First Nation produced a draft Traditional Knowledge Study and Health and Socio-Economic Study Results document that was split and finalized into two summary reports: 1) Wheeler River Project – Summary of Health and Socio-Economic Study Results (ERFN and SVS 2022a); and 2) Wheeler River Project - Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b). The studies collectively documented baseline land use and socio- economic conditions and identified Project-related concerns and opportunities.</p> <p>The information, in addition to other information provided by ERFN through engagement, has been incorporated into Section 11 and throughout the EIS.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Indigenous Knowledge has been integrated throughout the EIS, for example Section 9.1.2, Section 9.2.2, Section 9.3.2, Section 9.4.2, 11.1.2, Section 11.2.2, and Section 13.1.4 provides further details on the influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Terrestrial Environment, Land and Resource Use, and Economy. Of note, Denison has previously compensated a trapper potentially affected by exploration activities in and around the Project based on the potential for commercial loss, who has since passed away. This will be assessed going forward based on the potential for the Project to negatively effect commercial loss, and where appropriate, Denison will compensate accordingly.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Current use of lands and resources for traditional purposes	Concern about responsible authority for restoring the environment, including contaminants when mining concludes. How long will it take to have the environment fully restored and, if Denison is no longer the operator, how will this be completed?	*Project description listed above* ROC 140 ROC 447 ROC 456 ROC 506 ROC 618 ROC 621 Draft EIS Comments	<p>Section 2.3.3 provides information on decommissioning. The conceptual decommissioning plan highlights that remediation of the mining area will continue until water reached and is demonstrated to be stabilized at acceptable mining area decommissioning objectives as set out in regulatory requirements. Additional detail will be provided in the preliminary decommissioning plan (PDP), which will be submitted to regulators as part of Project licensing and permitting. Prior to executing decommissioning activities, Denison shall prepare and submit a detailed decommissioning plan, that builds upon the PDP, to regulators for acceptance. A Post-Decommissioning monitoring program will be designed and conducted in accordance with the provincial and federal regulations and licence conditions. The monitoring program will be conducted until the site-specific decommissioning and reclamation objectives for the Project are met.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Additional detail will be provided in the preliminary decommissioning plan (PDP), which will be submitted to regulators as part of Project licensing and permitting. Prior to executing decommissioning activities, Denison shall prepare and submit a detailed decommissioning plan, that builds upon the PDP, to regulators for acceptance. A Post-Decommissioning monitoring program will be designed and conducted in accordance with the provincial and federal regulations and licence conditions. The monitoring program will be conducted until the site-specific decommissioning and	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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					reclamation objectives for the Project are met.			
English River First Nation	Health and socio-economic conditions	Concern and interest in economic opportunities associated with the Project and education and training to facilitate access	ROC 5 ROC 99 ROC 140 ROC 447 ROC 456 ROC 618 ROC 621 Draft EIS Comments	<p>Sections 13.3.2.1 and 13.4 incorporate the following information:</p> <p>Denison has estimated a workforce of 300 people for the two-year Construction period. Each component of Construction will require workers with different types of skills and training depending on the task (e.g., road construction, wellfield drilling, erection of buildings, connection to services). During Operation, over 180 people are expected to be employed to operate the ISR wellfield and processing plant, as well as provide various supporting activities such as security, camp operations, operation of the water treatment, sewage and potable water plants, environmental monitoring, and maintenance of roads, equipment, and buildings. Total employment level of over 180 people is estimated to include 155 employees and 29 contracted. The anticipated workforce breakdown for Operation of the Project include the following types of positions: Foundation (82 jobs), Trades (35 jobs) Profession/Technical (46 jobs), Supervisory (21 jobs). Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs. Denison will negotiate with the Province of Saskatchewan to develop the Project’s SLA and the Human Resource Development Agreement, which will outline measures in relation to socio-economic parameters related to the Project.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Health and socio-economic conditions	Concern with process for business interactions with all communities and reflecting Indigenous perspective in business transactions	ROC 100 ROC 172 ROC 173 ROC 447 ROC 456 ROC 474 ROC 618 Draft EIS Comments	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan’s North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal	With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				<p>procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.			
English River First Nation	Health and socio-economic conditions	<p>ERFN noted a concern that people who have worked in the territory previously coming back to the territory for cabins.</p> <p>Can you integrate Indigenous land use into the economic assessment?</p>	<p>ROC 117 ROC 136 ROC 137 ROC 140 ROC 145 ROC 447 Draft EIS Comments</p>	<p>Section 13.2.3 provides detail on the consideration of the traditional economy as a key indicator as part of the economic valued component. The effect of Project-related activities on the traditional economy is measured as the change in the proportion of LSA residents participating in the traditional economy. See the Economics section of the EIS for more information.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Indigenous Knowledge has been integrated throughout Section 13 Economics and Section 13.1.4 provides further details on the influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Economic Assessment. Denison notes that the "Traditional Economy" was included as a key indicator in Section 13 and was integrated in a fulsome manner. Of note, Denison has previously compensated a trapper potentially affected by exploration activities in and around the Project based on the potential for commercial loss, who has since passed away. This will be assessed going forward based on the potential for the Project to negatively effect commercial loss, and where appropriate, Denison will compensate accordingly.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Health and socio-economic conditions	A concern was expressed about radiation and water levels exceeding targets.	<p>ROC 447 Draft EIS Comments</p>	<p>Section 2.2.3 outlines Denison's intent to recycle process water to the greatest extent possible, thereby reducing the demand for fresh water supply. In an effort to develop a conservative assessment basis for the EA, the water recycle flows from the industrial wastewater treatment plant back into the processing plant and wellfield have not been incorporated into the estimates for freshwater withdrawal and treated effluent discharge.</p> <p>Section 7.4.2.1 provides information on the site water balance. Water taking at a volume of 35m3/hr is anticipated throughout the construction. Discharge to the environment is not expected during</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				<p>construction. The main source of water taking for operation of the mine and to maintain water balance will be from groundwater sources. However, to supplement these volumes, surface water taking from Whitefish Lake was considered as part of the Surface Water Quantity assessment. Releases to the natural environment of contact water will be directed through the applicable collection ponds, Industrial Waste Water Treatment Plant, and Effluent Monitoring and Release Ponds. Discharge will only occur once it is safe to do so. Denison does not intend to include constant freshwater withdrawal or effluent discharge throughout operation; however, for the purpose of assessing the scenario of greatest potential effects, the Project was assessed as having a continuous freshwater withdrawal rate of 40.5m3/hr and a continuous effluent discharge rate of 81.0m3/hr. Water levels within surface water bodies were monitored over several years. The range of observed water levels at Whitefish Lake (SA-6) during 2016-2018 was 499.5 to 500.2 m ASL, with an average of 500.1 m ASL; as such the value assigned in the model (500.0) is an accurate (and slightly conservative) reflection of the average water level observed. What is important is the hydraulic head difference over the 300-year (or more) transport travel time. Recognizing that future conditions could be different by as much as 2 m (i.e., the depth of Whitefish Lake), this range of water level could be tested.</p> <p>Through the implementation of mitigation measures, outlined in Section 8.2.5, water quality in Whitefish Lake and, by extension, downstream of Whitefish Lake will meet appropriate benchmarks for the protection of aquatic life in consideration of a small mixing zone in the lake. Following Decommissioning and the restoration of drainage patterns that are similar to pre-mining conditions, water quality is expected to meet appropriate benchmarks for the protection of aquatic life in Whitefish Lake and downstream. This includes Russell Lake of which the Iceland River system is associated.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>				
English River First Nation	Health and socio-economic conditions	ERFN is looking for commitment later in the permitting phase to discuss the development and monitoring of key indicators (KIs) for community health and wellness that reflect the perspectives of community members within the region. Firstly, it is recommended that human health evaluation efforts and KIs / measurement endpoints be reviewed and consider expanding to encompass directly the health of Patuanak/Wapachewunak community members and	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 15)	As noted in the draft EIS, Section 10.1.8 monitoring will focus on collecting data to verify ERA model predictions as well as provide data to improve model predictions as the Project begins, with the goal of reducing uncertainty over time. It is expected this will be an iterative process, and will be approached in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation	Commitment to working with ERFN to understand how follow-up programs might be executed at the community level to address community perspectives.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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		<p>perceived risks. This may not be required to finalize the EIS as we understand the Human Health Conceptual Site Model based on fisher/trapper on Whitefish Lake and post-closure permanent resident on Whitefish Lake, however, it would be valuable to addressing concerns throughout the life of the project. For example, continued engagement with ERFN communities has identified that regardless of historical radiation protection performance, country food monitoring results and mine/mill personnel health monitoring, community member still believe that uranium mining contributes to cancer rates in community members. Perhaps a community specific KI could be developed and monitored (e.g., a limited uranium testing program looking at levels in ERFN residents on reserve versus off reserve). Further, local scale economy and wellness KIs could be proposed that reflect community members perspectives (e.g., local traffic rates / accidents and community quality of life and income disparity).</p> <p>Concern in relation to Section 10.1.1.2, Section 10.1.1.3, Section 10.1.3.2, Section 12.1.1.2, and Section 12.1.6</p>		<p>measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The environmental monitoring program is anticipated to include air emissions, surface water, sediment, soil samples, fish tissue sampling, benthic invertebrate tissue sampling, and country food sampling. Monitoring is currently anticipated on Whitefish Lake, McGowan Lake and Russell Lake, and could be expanded based on the interests of ERFN.</p> <p>Although no specific monitoring is currently anticipated with regards to the Cultural Expression VC (Section 12.1.8) follow-up programs for the EIS are proposed to address any uncertainties identified during the EA process. Denison is committed to working with ERFN to understand how this might be executed at the community level to address community perspectives.</p>				
English River First Nation	Other	Interest to make sure Elders are included throughout the process and have a meaningful and accessible role.	ROC 100 ROC 172 ROC 173 ROC 447 ROC 456 ROC 474 ROC 618 Draft EIS Comments	<p>Denison has applied a variety of methods to support engagement activities throughout the engagement process and used different methods with various groups depending on requirements and preferences of the process. Examples of this include local radio shows, presentations, and translations in both written and oral format. Determination of methods for ERFN specific engagement processes have been, and will continue to be, based on direct interaction with ERFN. Section 4.3.2 outlines engagement with ERFN to date.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	Commitment to ongoing engagement and adaptation to requests from ERFN	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	Questions and clarifications on ISR mining methodology, including freeze wall technology and Project power requirements.	ROC 5 ROC 134 ROC 137 ROC 140 ROC 456 ROC 618 ROC 621 Draft EIS Comments	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface.</p> <p>Section 2.2.1.3 provides information on freeze wall technology. The freeze wall is intended for tertiary containment of mining solution to support a defence in depth strategy as additional, site-specific data is obtained on hydraulic containment. The freeze wall around the mining area will extend from the surface to the basement rock, isolating the mining area from regional groundwater. The freeze</p>	General discussions to continue as part of ongoing dialogue.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.



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				<p>wall is expected to be a minimum of 10 m thick, be installed 25m away from the uranium deposit, and extend 30 m into the basement rock. Data from the groundwater monitoring network installed in and around the wellfield and freeze wall will make sure the freeze wall is meeting design specifications.</p> <p>Sections 2.2.6.1 and 2.2.6.2 provide information on primary and back-up power supplies. Electrical service to the Project will be provided via an approximate 5-km extension tap from the existing 138 kV overhead transmission line that runs along Highway 914. To provide electrical service during times of utility outages, diesel generators will be installed to service the site and maintain essential functions.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>				
English River First Nation	Other	Interest in making sure copies of the EIS are available to the public before public hearings.	*Listed above in Engagement	<p>Pursuant to CEAA 2012, copies of the final EIS are made available to the public in advance of a Commission Hearing.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	Interest in understanding existing water flows and existing fish species composition, size, and quality.	ROC 5 ROC 134 Draft EIS Comments	<p>Section 8.3.3.2 indicates that presence or absence of fish in the subwatersheds of the LSA is summarized in Table 8.3-5 and Figure 8.3-6 and Figure 8.3-7. These include a number of large-bodied species (i.e., Northern Pike, White Sucker, Longnose Sucker, Artic Graying, Walleye, Lake Trout, Lake Whitefish, and Burbot), as well as small-bodied forage fish species (i.e., Ninespine Stickleback, Slimy Sculpin, Spottail Shiner, and Yellow Perch). As barriers to fish movement were not identified, the absence of a species in lake or river habitats does not necessarily confirm that the species does not inhabit that area; rather, that the species was not actively captured, or the area is not characteristic of preferred habitat for the species. Fish spawning habitat for several species was confirmed in the LSA, both through LK and confirmatory field reconnaissance. This habitat is summarized in Table 8.3-3 and Table 8.3-4 and Figure 8.3-8, Figure 8.3-9, and Figure 8.3-10. Known spawning habitat occurs for Northern Pike, White Sucker, Longnose Sucker, Artic Graying, Walleye, Lake Trout, and Lake Whitefish in the LSA and Russell Lake, as well as upstream of the Project in the Icclander River system.</p> <p>The Baseline Hydrology Report included as Appendix 8-B indicates that the Project area lies within the Wheeler River watershed, which is part of the Churchill River Basin. Surface water from the</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				<p>Project site is drained by two sub-basins of the Wheeler River, the Iceland River drainage and the Williams Lake drainage. Both drainages flow generally south into the northwest portion of Russell Lake.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>				
English River First Nation	Other	Concern about possible soils and surface disturbances.	ROC 100 ROC 618 ROC 621 ROC 473 Draft EIS Comments	<p>Denison responded to concerns about surface disturbance due to activities in an Advisory Committee Meeting on June 15, 2021, as documented in ROC 473.</p> <p>Section 7.4.2.2 indicated that the assessment predicted maximum vertical displacement in altered sandstone immediately above the mining area (17.5 cm). A very minor change in elevation at ground surface (of less than 7.5 cm) was predicted within a discrete and localized area overlying the ore body. This degree of change may not be measurable as it is likely within the range of ground surface elevation change/disturbance associated with other routine operations at surface. The assessment evaluated what is considered the ‘worst-case’ scenario from a stability perspective. The model evaluated post-extraction stability as a single mass loss event across the entire active mining area. In reality, the mining area will be mined in phases and the phased approach is anticipated to lessen potential effect(s) on geological stability. In alignment with the modelling approach, the potential Project-related effect of subsidence was assumed to occur, essentially instantaneously, upon termination of mining (i.e., at the end of Operation). The modelling work is considered to provide a worst-case bounding scenario: if subsidence were to occur during the. Project phases or in the years following mining, the extent of vertical displacement is not expected to exceed that predicted in the modelling. Monitoring will be undertaken to evaluate any vertical displacement at ground surface (Section 7.8.1). Mitigation measures include contingency plans for stabilization of the geological environment localized to the mining area (Section 7.5). Therefore, this potential effect is not expected to be a primary contributor to potential residual effects following application of the proposed mitigation measures.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	Concern identified about how waste, such as radium iron material, would be handled.	ROC 100 ROC 618 Draft EIS Comments	Section 2.2.4 provides information on waste management. A waste management program will be developed for the Project to support licensing and permitting. The waste management program and associated plans developed to support licensing will be based on	A waste management program will be developed for the Project to support licensing and permitting.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as

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				<p>the 4 R's: Reduce, Reuse, Recycle, and Recover, and will detail how each type of waste generated on site will be managed.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>				part of ongoing engagement.
English River First Nation	Other	Concerns about climate change were shared, including inquiring about possible changes to permafrost on the Wheeler River.	ROC 100 ROC 134 ROC 621 Draft EIS Comments	<p>Section 9.1.7.1.1 provides information on permafrost. The Project is in a mapped area designated as Sporadic Discontinuous Permafrost. Large and/or expansive areas of continuous cryosolic soil and permafrost terrain do not occur within the RSA. For this reason, the potential effects are not expected to affect terrain stability within the Project Area within the life of the Project.</p> <p>Section 5.9.9 provides detail on the considerations of climate change throughout the EIS. Within the CEA of applicable VC-specific sections, a subsection has been included that provides a brief discussion on how climate change has been considered. Climate change has been included in the cumulative effects section because it is an external force that can influence the potential effects of the Project.</p> <p>Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	<p>Typo, the Economy VC is comprised of five, not four KIs. Please fix typo.</p> <p>Concern in reference to Section 13.1.2.</p>	ERFN Public Comment February 22, 2023	The typo is corrected in the EIS Section 13.1.2.	The typo is corrected in the EIS Section 13.1.2.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	Concern was raised for the use of the more sophisticated CALPUFF modelling package rather than Meteorological Society / Environmental Protection Agency Regulatory Model. Has the province accepted this method as appropriate? Concern is in reference to Section 6.1.4.2.	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 1)	<p>As described in Section B.1 of Appendix 6-A, staff at the Saskatchewan Ministry of Environment (Air Quality Branch) were consulted on the selection of CALPUFF and development of the CALMET meteorological data set, beginning in 2019. The CALMET consultation included an initial discussion about the general approach, and once the CALMET runs were completed, two technical memos were produced and reviewed by Ministry staff including: 1) a memo completed in March 2020 summarizing the general CALMET approach and results (e.g., wind roses, temperature data, precipitation data); and 2) a follow-up memo completed in May 2021, which answered specific questions posed by Ministry staff. Ministry staff also completed a review and provided feedback on the CALPUFF model setup in August 2021. The specific rationale for the used of CALPUFF in lieu of AEROMOD as documented in the March 2020 memo was as follows:</p> <ul style="list-style-type: none"><li>• The domain size needed to generate inputs for the human health and ecological risk assessment (HHERA) is estimated to be 60 km by</li></ul>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				60 km. The Saskatchewan Air Modelling Guide recommends CALPUFF for long-range transport (i.e., > 50 km); • CALPUFF includes wet and dry removal processes and chemical transformation algorithms that are needed to generate inputs for the HHERA and the terrestrial and aquatic assessments; and, The approach is consistent with other uranium mines in the area.				
English River First Nation	Other	<p>ERFN would like to further understand the progressive remediation of the mining area proposed, including thawing of the freeze wall in phases; it is believed reasonable for ERFN to request the following:</p> <p>i. Engagement between ERFN and Denison Mines throughout the life of the project, specifically pertaining to the remediated / restored solution targets and associated environmental effects monitoring.</p> <p>ii. The EIS appears to only provide the remediated / restored solution targets and the concentration of COCPs following mixing in Whitefish Lake Middle (the basin where impacted groundwater expected to interact with the receiving environment). ERFN requests clarification on the targets and concentrations in the EIS.</p> <p>iii. Alignment of environmental risk assessment updates and review of updates by ERFN prior to execution of progressive mine area remediation phases.</p> <p>iv. Prior to freeze wall thaw, there should be approved progressive decommissioning objectives that are considered conservatively protective of the receiving environment and contingency planning that would allow for continued remediation following freeze wall thaw, if this is deemed necessary by monitoring results. Further, the progressive decommissioning objectives should be considered living and reviewed regularly, as a finalized decommissioning and closure plan has not been approved.</p> <p>Concern is in reference to Section 2.3.3.1.1.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 2)	<p>With respect to:</p> <p>i. Denison has committed to meeting the mining area decommissioning objectives presented in the draft EIS (Table 2.3-3). These were modelled in draft EIS Section 7 with recharge to Whitefish Lake. Refinement of mining area decommissioning objectives is expected as part of updates to the decommissioning plan, which forms the basis of the decommissioning cost estimate and associated financial assurance. The conceptual decommissioning plan (CDP) included in the draft EIS (Section 2.3.3) contains the appropriate level of detail for this stage of the Project and recognizes that the details of the decommissioning plan and the elements thereof (including remediation and restoration targets and monitoring) will evolve and become more detailed and specific as the Project advances. The subsequent iteration of the plan is the preliminary decommissioning plan (PDP) which will be submitted to regulators as part of Project licensing and permitting. The PDP would reflect input that will be solicited from ERFN and others prior to its submission. Finally, prior to executing decommissioning activities, Denison shall prepare and submit a detailed decommissioning plan (DDP) to regulators for acceptance, which builds on the PDP. In this case the DDP would reflect input that will be solicited from ERFN and others prior to its submission and would also be informed by conditions on the ground at the Project site at that time, operational experience that has been gained and the regulatory landscape at that time. To reiterate, as highlighted above, the decommissioning plan, including the mining area decommissioning objectives, will evolve over time becoming more detailed and specific as the Project advances. Denison is committed to working with ERFN to solicit input through this process.</p> <p>ii. From Denison’s response and EIS contents, Denison is committing to no residual effects to groundwater beyond the mining area during operations and during decommissioning activities; nor effects from changes in groundwater to surface water in the vicinity of the project during the same time period. As such, no potential groundwater effects pathway occurs until restored solution targets are achieved and controls isolating the mining area are removed. As interpreted, this would imply that during operations and early decommissioning activities, there will be no measurable change to groundwater outside of the mining area.</p> <p>iii. As recommended, Denison will work with ERFN to align the ERA updates and reviews of those updates as recommended.</p> <p>iv. The narrative posed by the review comments is consistent with</p>	<p>Denison has committed to meeting the mining area decommissioning objectives presented in the draft EIS (Table 2.3-3).</p> <p>Denison has committed to no residual effects to groundwater beyond the mining area during operations and during decommissioning activities; nor effects from changes in groundwater to surface water in the vicinity of the project during the same time period.</p> <p>Denison will work with ERFN to align the ERA updates and reviews of those updates as recommended.</p>	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				Denison’s perspective on how the decommissioning process (and therefore development of the decommissioning plan including decommissioning objectives) will be implemented. The reader is further referred to the response to part i provided above that describes the overall progression of the CDP to the DDP. As noted, Denison will engage with ERFN to solicit input during all phases of the process and Project.				
English River First Nation	Other	<p>ERFN would like clarification on whether or not start up of backup generators for the injection and recovery wells and IWWTP will be immediate? Is there a concern of loss of mining solution containment because of a power outage? ERFN understands there will be planned period when the IWWTP will be offline, does this planning also encompass unplanned events? ERFN requests commitment from Denison Mines of ongoing engagement pertaining to the development of the wellfield environmental effects monitoring and Emergency Preparedness and Response Plan.</p> <p>Concern is in reference to Section 2.2.6.2.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 3)	<p>Electrical service to the Project will be provided via an approximate 5-km extension tap from the existing 138 kV overhead transmission line that runs along Highway 914. Denison expects an average of six outages per year based on information provided by SaskPower. An outage would be anticipated to last a few hours for a given event. As noted in the draft EIS, Denison will have back-up power supply available with diesel generators to supply power to essential services and functions.</p> <p>In the event of a power interruption, essential services would include the processing plant HVAC system and ensuring the power to the processing plant was maintained to provide Denison the overall ability to shutdown the processing plant in a safe manner. While this is happening (i.e., processing plant shut down), the majority of the electrical loads from the generators will be directed to these activities. Once the processing plant is shutdown safely, loads can then be redirected on a priority basis.</p> <p>In terms of the wellfield operation, the inwards hydraulic gradient only needs to be maintained when mining solutions are being injected. In the event of a power interruption, no mining solution injection would be occurring, therefore no UBS recovery would be required for vertical containment as the system would become static. Denison may use the “sit and soak” method in the wellfield as part of routine ISR mining (i.e., no injection or recovery) which essentially provides Denison the ability to store or hold solutions underground.</p> <p>In terms of the freeze wall, the design and nature of the freeze wall means that the integrity of the freeze wall will not change during short-term power outages. Even if a longer outage is envisioned, freeze wall integrity is would not be compromised. Once developed, the freeze wall would take months to thaw. It is also noted that the freeze wall provides tertiary containment of the mining solution / UBS.</p> <p>With regard to unplanned events and/or care and maintenance situations, Denison would manage the wellfield as follows:</p> <ol style="list-style-type: none"><li>1. Provided power is still available to site the UBS can be used as make-up in the mining solution and recirculated into the wellfield in a closed loop system.</li><li>2. If power is lost to the site, the well pumps can be shut off with existing mining solution and UBS remaining stagnant within the mining zone. As the mining zone is contained within the freeze wall with the combined absence of pumping/injecting, no hydraulic</li></ol>	Commitment to engagement with ERFN where input will be solicited and opportunity for document review will be provided, as necessary, for the Environmental Management Program, including development of the Heritage Resource Management Plan, Emergency Preparedness and Response Plan, and Environmental Effects Monitoring Programs.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				gradient existing (translating to no flow). As per correspondence dated July 26, 2023, Denison is committed to engagement with ERFN where input will be solicited and opportunity for document review will be provided, as necessary, for the Environmental Management Program, including development of the Heritage Resource Management Plan, Emergency Preparedness and Response Plan, and Environmental Effects Monitoring Programs. Denison and ERFN have an agreed upon process for such activities in the future.				
English River First Nation	Other	It appears that a specific source term for the clean waste rock has not been provided, and that if deemed to need management a liner will be integrated into the pond design and contact water would be sent to the IWWTP. ERFN expects that the material would be non-potential-acid generating and non-potential metal leaching. ERFN is asking for clarification as to what will inform this decision, for example is it that the clean waste rock would not need management if the leachate would meet surface water quality guidelines?  Concern in reference to Section 2.2.4.8.	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 4)	Conceptually, clean waste rock is defined as non-mineralized and non-potentially acid generating (non-PAG) rock. More precise criteria (numeric and/or narrative), and testing program documentation, will be developed as part of the Waste Management Program that will describe the basis for waste rock segregation based on mineralized content and acid generating potential. For further reference the following is noted. “Clean” waste rock (as described above) is expected to comprise clean sandstone cuttings and core. Waste rock from the sandstone will be characterized during construction and operation per the Waste Management Program prior to placement on the clean waste rock pad. Waste rock characterization will be done primarily based on geological and geochemical characteristics though static and kinetic testing, as appropriate, following standard testing guidance to ensure the rock is both non-mineralized and non-PAG. Any waste rock identified as being mineralized or PAG will be stored on the special waste pad. While the draft EIS did not definitely state that a clean waste rock pond would be constructed, Denison has since committed to constructing a single geomembrane lined pond adjacent to the clean waste rock pad to collect contact water. The contact water in the clean waste rock pond will be routed to the process water pond for eventual treatment in the IWWTP and ultimately released to Whitefish Lake.	Commitment to constructing a single geomembrane lined pond adjacent to the clean waste rock pad to collect contact water.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	In the EIS, there are no details provided in relation to the off-site processing and permanent disposal of the process precipitates. Please clarify whether or not this activity will be encompassed in decommissioning and closure or would this activity potentially occur during operations. As there are processing and disposal options within ERFN Nutsiye-kwi Benéne, ERFN requests commitment from Denison Mines to ongoing engagement pertaining to this component of the operations.  Concern in reference to Section 2.2.4.5.	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 5)	Denison is committed to continued dialogue with ERFN on the details related to the sale, transport, off-site processing, and final disposal of the process precipitates. At this time it is envisioned that these details will be developed as part of the decommissioning plan updates and will outline the timing for when these assets are removed from the Wheeler River Project site, as well as the regulatory approvals process to which such activities may be subject, including but not necessarily limited to provincial approvals or federal licensing requirements and statutory obligations such as those described in the Transportation of Dangerous Goods Regulations.	Denison is committed to continued dialogue with ERFN on the details related to the sale, transport, off-site processing, and final disposal of the process precipitates	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	It appears to be stated that during construction contact water discharge to the receiving environment from the Clean Water Rock Pond might be required in the case of	ERFN Public Comment February 22, 2023	During construction, no effluent is expected to be released to the aquatic environment. As part of both diamond and rotary drilling activities during	ERFN’s engagement and review of the Environmental Management Program,	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as



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		<p>upset conditions (e.g., extreme precipitation event). As such, ERFN requests commitment from Denison Mines to ongoing engagement pertaining to development of a Construction Environmental Management Plan, including discharge monitoring and trigger action response planning, as well as having a qualified environmental professional design this plan and/or be present during high-risk construction activities.</p> <p>Concern in reference to Section 8.3.4.2.1 and Section 8.3.4.2.3.</p>	(ERFN Main Area of Concern 6)	<p>construction, a centrifuge will be used for separating out solids in order to recycle fluids. Only solid drill cuttings, not wastewater, will be produced and all muds and waters will be recycled as part of the drilling process. Upon completion of a drilling campaign, all remaining mud and water will be stripped of solids, treated with mud zymes to break down polymers, and injected back down into the mineralized horizon. During active drill campaigns clean water will be held in approved tanks.</p> <p>Any contact water stored in the clean waste rock pond during construction will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / licence requirements. It is also important to note that the sequencing of construction activities will occur in a manner that prioritizes water management based on Project execution plans. For instance, construction of the wellfield runoff pond will be prioritized during the early part of construction and it will be able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the clean waste rock pond during construction. Should the volume of water requiring management exceed site infrastructure storage volumes during construction, contingency measures would be available and could include for example use a hydrovac for offsite disposal.</p> <p>More broadly in terms of Project water management pond designs, ponds will be constructed to maintain a minimum freeboard of at least 1.0 m to allow for continued functioning during a probable maximum precipitation (PMP) event. The PMP event used for feasibility engineering designs is 493 mm. The PMP is very conservative as it effectively assumes a full year of precipitation in one event, under both existing and future climate conditions. For comparison, the PMP is well above both the 24-hour maximum precipitation (e.g., 72 mm recorded at Key Lake in 1998) and 1:100, 24 hour return precipitation events (e.g., 88.6 mm for climate change influenced IDF curves). However, in the event that a pond's design basis is exceeded, emergency spillways will direct excess water away safely as not to compromise the integrity of the water management infrastructure. An unplanned event such as a pond exceeding its design capacity will be reported to ERFN in a timely manner per the commitments in the Public Information Program. ERFN's engagement and review of the Environmental Management Program, including the Emergency Preparedness and Response Plan, will be completed in the agreed upon process for such future activities. The program and plans will outline commitments for the construction phase. While details on the plans are not available at this time, Denison welcomes ERFN's input and recognizes the</p>	<p>including the Emergency Preparedness and Response Plan, will be completed in the agreed upon process for such future activities. The program and plans will outline commitments for the construction phase. While details on the plans are not available at this time, Denison welcomes ERFN's input and recognizes the importance of having qualified environmental professionals onsite during construction activities.</p>			part of ongoing engagement.

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				importance of having qualified environmental professionals onsite during construction activities.				
English River First Nation	Other	<p>In relation to IWWTP effluent it is stated that discharge will be to a surface waterbody or injected into groundwater via deep well inject. However, the EIS only assesses direct release of 10.1 L/s of effluent to Whitefish Lake during operations and decommissioning. As such, any deviation from this discharge plan would need to be assessed and approved prior to implementation.</p> <p>Concern in reference to Section 8.2.4.1.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 7)	Reference to effluent discharge via deep well injection was a typo in the draft EIS and will be removed from Section 8 of the final EIS. Effluent release is to Whitefish Lake only and no deep well injection of effluent is planned.	Change made to final EIS (Section 8).	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	<p>Can you provide clarification re: Sulphate and sulphate (Hardness) concentrations provided? It would be anticipated that the screening concentration would change because of hardness, but it is unclear as to why the predicted concentration would increase?</p> <p>Concern in reference to Table 8.2-10.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 8)	There was a typographical error in Table 8.2-10 in the draft EIS; the sulphate (hardness) value in column LA-5 Well Mixed (7Q10) should read 63.83 mg/L. Table 8.2-10 is updated in the EIS and also includes the addition of MDMER constituents (these were added to address a comment from the federal review process, IR-114).	Change made to final EIS (Section 8).	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	<p>Specifically, the EIS appears to only provide the IWWTP effluent quality and the concentration of COCPs following mixing in Whitefish Lake Middle (the basin where impacted discharge is expected to interact with the receiving environment). As dilution in Whitefish Lake Middle is required to meet guidelines for some COCPs., are chronic toxicity effects possible within the initial dilution zone within the basin including salinity? If yes, what portion of the available habitat would be impacted by elevated levels of COCPs? In relation to the potential for chronic exposure within a dilution zone, ERFN requests engagement as this should be captured within the aquatic effects monitoring.</p> <p>Concern in relation to Section 8.2.4.2.3.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 9)	<p>An analysis of near-field effluent mixing was undertaken as part of the EIS, based on discharge to Whitefish Lake through an off-shore multiport diffuser. Simulations were carried under different flow scenarios using CORMIX to assess the size of the mixing zone. In this case, the meaning of “mixing zone” can be used synonymously with “regulatory mixing zone” that is defined as an area (or water volume) where numeric water quality thresholds (i.e., chronic effects thresholds) may be exceeded as long as conditions inducing acute toxicity are prevented. Such a situation (i.e., existence of a regulatory mixing zone) is envisioned by the MDMER (and in fact permitted by statute), as well as the provincial water quality policy framework.</p> <p>The results of effluent mixing analysis predicted that the regulatory mixing zone would be very small under each of the modelled scenarios. It was predicted that constituent concentrations would be equal to or less than their respective water quality objectives (i.e., chronic effects thresholds) within a few meters (up to 5 m) of discharge and by definition those constituent concentrations would be protective of the most sensitive life stage of the most sensitive resident aquatic taxa.</p> <p>Both effluent-based and receiver-based monitoring plans will be developed as the Project moves forward and Denison is committed to working with ERFN in that process. For reference, at minimum the programs would be designed consistent with and to meet the requirements of the MDMER, as well as provincial operating permits that will be negotiated subsequent to the EA process. Under MDMER, effluent (end of pipe) monitoring would include laboratory-based chemical and biological (acute and sublethal toxicity) measurement and testing (see MDMER Part 2, Division 2 –</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				Effluent Monitoring Conditions). Under MDMER, receiver-based monitoring, including effluent and water quality monitoring studies and biological studies are completed within the framework of the Environmental Effects Monitoring program (MDMER, Schedule 5).				
English River First Nation	Other	<p>It would appear that a temperature assessment was not completed for the proposed heated treated effluent discharge line. It is assumed if there is the potential for adverse effect to the receiving environment, discharge limits would be stipulated as a licensing condition. ERFN requests engagement regarding the establishment of effluent discharge limits, as well as finalized remediated/restored solution targets.</p> <p>Section 8.2.4.2.5.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 10)	<p>The EIS does consider the potential thermal effects of effluent in Whitefish Lake; please refer to Appendix 8-E Constituent Concentrations and Mixing Zone Assessment Report. Because the effluent holding ponds are outside, Denison anticipates very minimal differences in the temperature of effluent entering the lake versus the lake water itself. Effluent will be discharged to Whitefish Lake via a pipeline and multiport diffuser that will be situated at depth of 3-4 meters depth. The effluent itself will be held in effluent monitoring ponds prior to discharge and maximum effluent temperature is assumed to be 5 degrees Celsius during the winter. Water temperature in Whitefish Lake during ice-cover is expected to be between 3 and 4 degrees Celsius. As such, the effluent may have a temperature difference of between 1 and 2 degrees Celsius in the immediate zone of the diffuser ports. Mixing of the effluent with the receiving water will be nearly instantaneous and over an area of less than 5 m and generally near its depth of discharge (3 to 4 m). As a result, the thermal change within the highly localized mixing zone will be less than a degree Celsius.</p> <p>We note that Denison will be collecting field temperature in effluent samples as part of the requirements under Schedule 3 of the MDMER. Water quality monitoring will also be conducted to meet the requirements of the MDMER and includes recording temperature of water in both exposure (e.g., Whitefish Lake) and reference areas, per MDMER Section 7(1)(b). It is also assumed that similar monitoring requirements would be included within provincial approvals.</p> <p>The above monitoring will allow Denison to test the assumptions made in the EIS and to understand any potential thermal effects of effluent in Whitefish Lake. This level of monitoring is appropriate as a starting point. If based on monitoring data it was evident that the EIS assumptions were not being met the monitoring program would be adapted accordingly. This approach is consistent with Denison's overall approach to its proposed environmental monitoring programs that will incorporate adaptive management.</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	<p>Can it be clarified as to whether or not the clear span bridges proposed for stream crossings will be temporary or intended for use throughout the life of the project? There is uncertainty as the DFO Interim Code of Practice for Temporary Stream Crossings, but the use of these crossing doesn't seem to be limited to a limited stage of the life of mine?</p> <p>Concern in reference to Section 8.3.5.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 11)	<p>The two clear span bridges proposed at stream crossing locations would be in place for the life of the Project to allow for transportation of staff and contractors between the airstrip and the main Wheeler River Project site.</p> <p>Section 8.3.5 of the draft EIS does list adherence to the Interim Code of Practice for Temporary Stream Crossings as a mitigation measure, as applicable. Denison does not expect this code of practice would apply to the final, constructed clear span bridges, since these are not temporary structures. However, depending on</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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				how construction sequencing and logistics proceeds, Denison may use temporary watercourse crossings to access the eastern shores of the streams, as needed. Temporary stream crossings are employed for short term access across a watercourse by construction vehicles when an existing crossing is not available or practical to use. Denison acknowledges that any temporary watercourse crossings, if used, are not intended for prolonged use, per the code of practice.				
English River First Nation	Other	<p>What is the rationale for the timeframe (post-closure) criteria in terms of concluding full reversibility of an effect? Table 3-4 of Appendix 10-A indicates that mass flux (mg/s) rates of molybdenum and selenium persist for 1000 years or more following the end of decommissioning. Further, it is our experience that effects to sediment quality would not decrease for some time following cessation of the water quality effects.</p> <p>Concern in reference to Table 8.3-9.</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 12)	<p>The Section 8.3 assessment related to the Fish and Fish Habitat Valued Component’s Key Indicator of surface water quality is focused on the release of treated effluent. As such, the timeframe for the fully reversible rating in Table 8.3-9 is the post-decommissioning period and considers whether or not the residual effect on surface water quality can be reversed once the activity causing the residual effect (i.e., treated effluent release) ceases. Refer to draft EIS, Appendix 10-A, Figure 3-2 for modelled concentrations of COPCs in water, which show COPC concentrations returning to baseline concentrations in the post-decommissioning period. The figure shows the first five years of post-decommissioning and the actual post-decommissioning period extends to a total of 15 years.</p> <p>The “future centuries” scenario evaluates the potential effects post-restoration (i.e., beyond the Project timeline of 0-38 years) and reflects the time period over which the highest constituent concentrations in groundwater are predicted to migrate towards and interact with surface water. The period of time between the cessation of discharge of treated effluent to Whitefish Lake and when remediated solution in the decommissioned mining area migrates to Whitefish Lake is hundreds to thousands of years. To be conservative the future centuries modelling in Appendix 10-A assumed the mass flux from groundwater to Whitefish Lake starts 200 years after the post-decommissioning phase. Between the end of post-decommissioning period and the start of the future centuries, any changes to surface water quality from treated effluent release would be fully reversed (refer to Appendix 10-A, Figure 3-4). The EIS considered the post-decommissioning changes through the future centuries assessment which was completed in Appendix 10-A. The predicted maximum concentrations of COPCs in water and sediment during future centuries are shown in Appendix 10-A, Table 3-5. There are no predicted exceedances of water and sediment quality guidelines for any of the COPCs and as such, the future centuries evaluations were not carried through the residual effect characterizations in Section 8.</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Other	<p>There appears to be some uncertainty regarding the benthic invertebrate community and tissue chemistry data provided. Regarding the tissue chemistry, it is understood that baseline data would have been used to evaluate the baseline predicted by the environmental</p>	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 13)	<p>For clarity, in the ERA model (Appendix 10-A) the benthic invertebrate tissue chemistry predictions shown are modelled values based on exposure to surface water and sediment in consideration of Project-related releases to the aquatic environment and appropriate bioaccumulation factors. The</p>	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.

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		<p>effects assessment, and as such questions regarding the ERA sampling program may not affect the outcome of the assessment. However, having a robust baseline in terms of benthic invertebrate community composition and abundance would be required to complete a before-and-control-impact assessment (pre and post operations). It is our experience that benthic invertebrate community composition and relative abundance are sensitive end point to changes in aqueous and sediment metal concentrations. If changes are observed above those predicted in the EIS, the first area of investigation would be metal speciation and contaminant bioaccumulation in the organisms.</p> <p>Concern in reference to Section 8.4.3.2.5 and Table 8.4-4.</p>		<p>measured baseline benthic invertebrate chemistry was not used specifically within the ERA, but the ERA was informed by the measured data in that the baseline data were used to validate the model predictions. Generally, there was reasonable agreement for many parameters though some constituent concentrations were either over- or underestimated by the model. The model predictions will be updated as part of routine ERA updates throughout the life of the Project. Additionally, the model predictions will be compared to measured benthic invertebrate tissue chemistry collected as part of monitoring programs. The overall objective of this process is to continue to gain a better understanding of potential risks associated with the Project as more operational data are generated and reduce the uncertainty related to estimating such risks.</p> <p>A very brief overview of the benthic invertebrate data collected as part of the environment baseline characterization is shared below for reference. Benthic invertebrate samples were collected in 2016 at ten lake locations and a total of 78 benthic invertebrate taxa from 38 major taxonomic groups (Families) were identified within the study area (Appendix 8-D). Chironomids were prevalent across the study area and were the most numerically dominant taxon at most locations. Other taxonomic groups that represented more than 10% of the total benthic invertebrate density at a sampling location were detritus worms (Naididae), pill clams (Pisidiidae), water fleas from the families Holopedidae and Macrothricidae, and phantom midges (Chaoboridae). From a feeding group perspective, predatory taxa and those that feed on fine particulate organic matter (collector-gatherers) were generally the most abundant groups in lakes within the study area.</p> <p>As alluded to in the review comment, benthic invertebrates will be utilized to assess potential effects related to the Project, and in particular those that may be associated with the discharge of effluent. As such, and also as noted in the review comment a “robust” baseline data set is needed to evaluate such effects. The baseline benthic invertebrate collections made in areas relevant to assessing the potential effects of effluent discharge were sampled with rigour (i.e., sample replication and processing methodology) consistent with the federal EEM program requirements, and therefore in that regard meet the robustness test and can be used to help define the before condition in the BACI framework. Moving forward (that is in the operations phase of the Project), benthic invertebrate community sampling will be implement though the site’s EEM program and, at minimum, would be completed in a manner consistent with MDMER requirements. Sampling would focus on upstream reference areas and downstream effluent exposed areas and would be statistically based to ensure an appropriate level of statistical power is provided to determine whether there are mine-related effects, or not. Endpoints that</p>				

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				would be measured include density, richness, evenness and community composition (via the B-C Index). The above does not preclude the execution of a further before operations benthic invertebrate community sampling program that would further define the before condition in the BACI framework. Such considerations are in the early planning stages and will be considered in the next stage of EMS documentation whereby plans and procedures are developed. As previously indicated Denison is committed to involving ERFN in development of those plans.				
English River First Nation	Other	It is stated that pre-constructed listed plant surveys / breeding bird surveys would be required on the final project footprint with ecosites that were not sampled in 2017; however, it is ERFN’s understanding from the June 22nd site tour that almost all of the footprint has already been disturbed. Were preconstruction surveys completed prior to clearing activities?  Concern in relation to Section 9.1.1.1 and Section 9.4.3.	ERFN Public Comment February 22, 2023 (ERFN Main Area of Concern 14)	The commitments made in the EIS, including those related to pre-construction surveys, are applicable to the Project as it advances to the Project development phase. Any forest clearing completed by Denison to date was done in accordance with the Saskatchewan mineral exploration guidelines and permitted through Saskatchewan Ministry of Environment, Lands Branch as part of exploration activities.  While some limited areas above the Phoenix uranium deposit and trails have been cleared in previous years to access the site as part of exploration activities, the majority of the proposed Project Area has not been cleared. For example, the footprints of the proposed airstrip, camp, processing plant, borrow area, landfills, and portions of the access roads within the Project Area are undisturbed areas consisting primarily of upland jack pine ecosites. Please refer to draft EIS Figure 9.2-6: Vegetation Communities and Ecosystems within the Project Study Areas for a visual representation of the current anthropogenic disturbance within the Project Area. The current anthropogenic disturbance in the Project Area is approximately 24.8 hectares which represents less than 15% of the total Project Area (169.6 ha) (refer to draft EIS table 9.4-20 Summary of Available Common Nighthawk Habitat, Direct Habitat Loss, and Habitat Alteration in the Study Areas).	N/A	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.
English River First Nation	Physical and cultural heritage	Better understanding of the heritage assessment done and the proposed plans for responding to the identification of a heritage artifact.	ROC 591 Draft EIS Comments	Following the implementation of the mitigation measures outlined in the Heritage Resource Management Plan (HRMP), the likelihood of residual effects is considered low and residual effects on Heritage Resources will occur infrequently and can be mitigated with the HRMP. Known archaeological resources identified in the Project Area were deemed to have low potential for archaeological interpretation and additional work or mitigation measures were not required for the sites; the Heritage Conservation Branch had no further concerns with these sites and work could proceed as planned. Should unknown archaeological and cultural resources be identified during the Project, effects will be mitigated using the HRMP. While effects to archaeological resources are irreversible, they can be mitigated by following the HRMP, by either avoiding additional damage to the resource by creating a buffer zone around the site, or by assessing the resource according to The Heritage Property Act to enable the full interpretation of the site before continuing with work.	Denison committed to including a consultation element with ERFN in the Heritage Management Plan, should an artifact be found during the development of the Project.	Resolved - agreement reached by both parties.	As per letter dated November 24, 2023	General discussions to continue between Denison and ERFN as part of ongoing engagement.



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				Through the draft EIS review process, Denison has worked directly with ERFN to understand, consolidate and resolve any of its outstanding concerns. Denison and ERFN have come to resolution on this area of interest.				

Appendix C-2: KML Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Northern Village of Pinehouse and Kineepik Métis Local	Current use of lands and resources for traditional purposes	The community has pre-existing Indigenous Knowledge and will work with Denison on this.	ROC 106	<p>In 2018, KML approached Denison to support a land use mapping initiative in the Project area. The 2018 study builds on existing land use maps, completed in 2011. A verification meeting was held in late 2018 to make sure no geographic data gaps existed and that the results speak for the whole community. In 2022, KML prepared a document to voice their perspectives on Project VCs and to provide a record for EIS development. Based on 12 community engagement sessions and review of the land use maps, KML explained their unique social, cultural, and historical context, expressed a general consensus of support for the Project, and described issues and concerns.</p> <p>See Section 3 for information on IK and LK and how this information was integrated throughout the EIS.</p>	Section 3 provides information on IK and LK and how this information was integrated throughout the EIS. Indigenous Knowledge has been integrated throughout the EIS and a section on the Influence of Indigenous Knowledge, Local Knowledge, and Engagement is provided in the methodology for sections. For example see Section 11.1.2 and Section 11.2.2 for further details on how Indigenous Knowledge, Local Knowledge, and Engagement influences Land and Resource Use.	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Current use of lands and resources for traditional purposes	Concern was expressed over cumulative effects in the region.	ROC 105	<p>Denison conducted a cumulative effects assessment, which included the Highway 914 extension project, on categories:</p> <ul style="list-style-type: none"> <li>-The Atmospheric and Acoustic Environment.</li> <li>-Geology and Groundwater.</li> <li>-The Aquatic Environment.</li> <li>-The Terrestrial Environment.</li> <li>-Human Health.</li> <li>-Land and Resource Use.</li> <li>-Quality of Life.</li> <li>-Economics.</li> </ul> <p>Denison respects and understands KML’s concern about the cumulative effects in the region, particularly in relation to access to traditional lands and resources in correlation with industrial and mining developments. The residual effects of the Project are expected to interact with the residual effects of other projects and activities in the ILRU RSA, resulting in potential cumulative effects to Indigenous land use activity in the area. This is largely due to the proposed Highway 914 extension project.</p> <p>See Section 16 for a summary of the cumulative effects assessments for each category above.</p>	N/A	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Current use of lands and resources for traditional purposes	Russell Lake was noted of particular importance for recreational/commercial fishing.	ROC 2 ROC 620	<p>Denison noted the importance of Russell Lake and considered Russell Lake in the LSA in terms of recreational/commercial fishing.</p> <p>Negligible aquatic habitat loss is predicted in LA-5 (also known as Whitefish Lake) due to the installation of a discharge pipeline and diffuser configuration. The total area of the lake substrate that would be overprinted by the pipeline is expected to be approximately 135 m2, which will constitute less than 0.05% of the lake’s surface area. No other alteration, disruption, or destruction of aquatic habitat in the aquatic environment LSA is expected. Project-induced changes to the abundance and distribution of fish is, therefore, not expected. The effect, if any, is expected to undetectable to fishers.</p>	The Agreement currently being negotiated between Denison and KML outlines specific commitments for KML participation in environmental monitoring associated with the Project, including the potential for monitoring fish species harvested by and important to, KML.	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				<p>The Agreement currently being negotiated between Denison and KML outlines specific commitments for KML participation in environmental monitoring associated with the Project, including the potential for monitoring fish species harvested by and important to, KML.</p> <p>See Section 11 for information on how the Project will interact with land and resources including how potential effects will be mitigated.</p>				
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	<p>As noted in the KML's summary of Primary Concerns:</p> <p>1) There is a need for funding for education and training to reach a standard of knowledge in mining, science and math required to understand the impacts of uranium mining industry that is expected for an Indigenous community to be able to make free and prior informed decision on impact and expectation of that industry.</p> <p>2) Development of a centre of Excellence in Pinehouse to organically develop the knowledge transference required for Indigenous community to understand the uranium mining industry including regulations, materials used, transportation, end use of products, education required mitigation efforts etc.</p> <p>3) Support for training and education to support KML and Pinehouse on uses of artificial intelligence in the mining projects and to what level this activity can be managed by and in the community. A strategy to build capacity for matriculation graduates with the following classes English 30A 30B Chemistry 30, Physics 30, Math 30. KML wants to increase the community western education levels so that they are knowledgeable and have the capacity to protect themselves and the environment.</p>	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #93)	<p>Denison has estimated a workforce of 300 during the two-year Construction phase and 180 during the Operation phase. Mineral sector positions are typically considered to be higher paying than many other industrial positions. Residents and communities in the LSA (ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village) will be given first priority for employment, training, and business opportunities, followed by residents and communities in the RSA (Northern Saskatchewan Administrative District). Mitigation and enhancement measures will be implemented by Denison to enhance the positive effects of the Project on employment and training, income, traditional economy, and business opportunities and minimize adverse effects including:</p> <ul style="list-style-type: none"><li>• A Human Resource Development Plan to initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities;</li><li>• Establishment of a procurement approach through all phases of the Project, focusing on businesses based within the LSA communities, followed by Indigenous and / or businesses in the RSA;</li><li>• Negotiation with the Province of Saskatchewan to develop the Project's Surface Lease Agreement and Human Resource Development Agreement.</li></ul> <p>See Section 13 for a summary on local, provincial, and federal Project benefits and Denison's approach to employment, training, and business participation opportunities for communities.</p> <p>See Section 13 for information regarding employment, employment opportunities, and career growth for community members.</p> <p>As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities.</p> <p>In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible and will continue with ongoing discussions in this regard.</p>	<p>Residents and communities in the LSA (ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village) will be given first priority for employment, training, and business opportunities, followed by residents and communities in the RSA (Northern Saskatchewan Administrative District).</p> <p>Mitigation and enhancement measures related to employment and training, income, traditional economy, and business opportunities and minimize adverse effects include a Human Resource Development Plan (outlining the above employment commitments), an establishment of a procurement approach through all phases of the Project, focusing on businesses based within the LSA communities, followed by Indigenous and / or businesses in the RSA, and negotiation with the Province of Saskatchewan to develop the Project's Surface Lease Agreement and Human Resource Development Agreement.</p> <p>In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible and</p>	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
					will continue with ongoing discussions in this regard.  Commitments and mitigations are described in Section 13.			
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	KML and NVP must be educated on all aspects of the Denison project to remove limited understanding of the processes that occurred within our traditional territories. They note that they cannot learn how to protect the land if they cannot understand the math and science involved in mining and environmental protection. KML people require higher education levels because of the collateral effect, on their population, caused by industry [which the proposed Wheeler River project adds to]. They further assert that they must understand the technological advantages being employed in the Denison Wheeler River Project. This transference of knowledge can occur through a sustained and supported education program. The community will also require confidence that any environmental incidents are managed in a way that is fully understood by the community. A long-term plan would be to develop and build that capacity in the community to manage the incidents and monitor any environmental cleanup processes. They want assurance that the standards being followed and that as a community, KML are able to action a response to mitigate potential environmental impact. This knowledge must become an integral part of the community knowledge and capacity for this project and for uranium exploration and mining in general. As noted in their summary of Primary Concerns, this includes: <ul style="list-style-type: none"> <li>• Begin training and education support for community to prepare for employment at the mining operations with a focus on females, youth, and previously marginalized land users. Effort to increase employment in trades and drilling related work.</li> </ul>	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #95)	See responses to KML and NVP Public Comment #93	See responses to KML and NVP Public Comment #93	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	When determining community safety with respect to need for increased transportation for a new operation, the Indigenous people of KML have the following concerns: <ul style="list-style-type: none"> <li>• The state of the existing road from 165 to 914: The road has received upgrades up to the kilometer 75 on highway 165. From Kilometer 75 to Kilometer 112 where Highway 165 ends and Highway 914 begins, Highway 914 needs an upgrade in width all the way to Pinehouse to create a more industrialized road. KML are not looking forward to the spring road conditions with just the current industry activity.</li> <li>• Every community member has reported near miss incidents with the increased traffic caused by the general resurgence of the Uranium Industry using semi truck and heavy hauls to transport material to the operations and project sites. With the increase in incidents and near misses the opportunity for a major incident is inevitable, with the current road conditions. Adding the development of a new Denison mining operation will only increase</li> </ul>	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #96)	Project components include: ISR, Drilling, Freeze Wall, Wellfield, Processing, Water Management, Waste Management, Access and Transportation, Power, Support Facilities, Project Area, Project Activities, Ancillary Projects, GHG Emissions, Project Schedule, Project Benefits, Project Design Features, Management System, and Project Alternatives. Through an alternative means assessment, Denison considered options in relation to access and transportation. The access road alignment will follow part of the existing exploration access road, stream crossing structures will use clear span bridges, and worker transportation will be air transport to a) nearby Cameco operations or, b) a new airstrip constructed and operated by Denison. Denison incorporated the feedback provided on road options select the current road alignment for the Project. See Section 2 for information and technical detail pertaining to Project Components and Project alternatives; see also Appendix 2-C for Alternative Means Assessment. Highway improvements are not within Denison’s jurisdiction and are not considered in the EIS for the Wheeler River Project. However, Denison notes	Denison’s vision in respect of this concern is that Denison and KML work together as partners in discussions about highways with the Provincial Government. However, in respect of actions Denison can undertake regarding traffic along the road at times important for the undertaking of cultural activities, Denison commits to (Section 12): 1) Assisting KML with the clear identification of the forthcoming culture camp along highway 914 (providing clear signage) 2) Having Project vehicle slow down to 40km/hr from mid-August	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.

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		<p>this potential for incidents for people using this road.</p> <ul style="list-style-type: none"><li>• When you add the rough road conditions, visibility reduction in the winter and summer with dust and snow flurry from large vehicles. This causes unsafe conditions and increases the potential for incidents.</li><li>• The current capacity for road maintenance from the community members of Pinehouse are not prepared for the additional maintenance requirements for the road becoming a connected road. The road must be developed to an industrial rating to allow for the increase in industrial use so that members of KML do not experience safety issues. KML is requesting that the Transport Canada, Ministry of Highways respond to the concerns of Pinehouse and inform the community of the plans for road infrastructure development. KML would request the road be developed to the standard that the Key Lake and McArthur River Road is managed all the way to Junction of Highway 165 and Highway 2.</li></ul> <p>KML and NVP request further capacity to develop road management capacity so KML can provide the support necessary to manage the integrity of the road.</p> <p>As also noted in their summary of Primary Concerns, this includes a requirement for:</p> <ul style="list-style-type: none"><li>• Immediate efforts to build and increase emergency response capacity with community people from KML and NVP to support capacity for road incidents.</li><li>• Significant improvements to the road to an industrial grade from Highway 2 to the Key Lake gatehouse to support the massive increase in heavy traffic from Industry.</li></ul>		<p>KML’s perspective of increased traffic volumes and subsequent desire for highway improvements.</p> <p>On Highway 914 between Key Lake and Pinehouse, Denison anticipated that road users would see an increase between 16% and 40% over the life of the mine. Trucks travelling on this section of highway will increase from 35 to 53 at peak operational times.</p> <p>Denison’s vision in respect of this concern is that Denison and KML work together as partners in discussions about highways with the Provincial Government.</p> <p>However, in respect of actions Denison can undertake regarding traffic along the road at times important for the undertaking of cultural activities, Denison commits to:</p> <p>1) Assisting KML with the clear identification of the forthcoming culture camp along highway 914 (providing clear signage)</p> <p>2) Having Project vehicle slow down to 40km/hr from mid-August to mid-October, during the times when KML members may be using the portion of the road near the culture camp. To be specific, this includes 2.5km before the entry into the culture camp, and 2.5km after the entry into the culture camp.</p> <p>See Section 2, Appendix 2-B for more detail pertaining to traffic volumes.</p>	<p>to mid-October, during the times when KML members may be using the portion of the road near the culture camp. To be specific, this includes 2.5km before the entry into the culture camp, and 2.5km after the entry into the culture camp.</p>			
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	<p>Pinehouse will inherit significant impacts from the transportation of goods and services to the mining operations. Safety of our community member is a paramount concern for the community. KML will be impacted from increased heavy haul traffic, and this will impede our ability to hunt for food. KML will also bear the effects of needed emergency services from our community first from the increased need for emergency response, which could dilute the limited emergency response services KML currently are provided. KML will also inherit any future security emergency requirement and expanded exploration and developmental impacts.</p> <p>The expectation is that within the life of the mine the community and industry will co- develop capacity to engage in emergency response including environmental spills, traffic incidents, air traffic incidents, emergency road security, search and rescue, fire fighting, and water rescue.</p>	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #97)	<p>Denison will establish a Transportation of Dangerous Good Program, intended to provide for the safe transport of goods by conforming to all applicable laws, regulations, company policies, and procedures. The Transportation of Dangerous Goods Program applies to all modes of transport and all locations where Denison assumes care and control of the materials.</p> <p>Denison will establish an Emergency Preparedness and Response Program to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. Emergency Preparedness and Response Program would be developed consistent with guidance provided by CNSC in REGDOC-2.10.1, Nuclear Emergency Preparedness and Response (CNSC 2016).</p> <p>Increased pressure on emergency services is most likely to stem from an accident or malfunction on Highways 914 or 165. The extent to which these changes could affect any given community would depend on the nature of the accident or malfunction. Accidents and malfunctions for the Project were determined to (generally) have a highly unlikely to unlikely probability of occurrence, with an overall risk rating of low to moderate; however, the severity of accidents and malfunctions was determined to be minor to major. If such an event were to occur, local resources may be called upon to provide support, which may result in a call to fire, RCMP, or ambulance services depending on the</p>	<p>Denison will, as described in Section 12, establish a Transportation of Dangerous Good Program, intended to provide for the safe transport of goods by conforming to all applicable laws, regulations, company policies, and procedures. Denison will establish an Emergency Preparedness and Response Program to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property.</p>	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.

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				nature of the event. Denison will provide any necessary training and/or equipment to local first responders to make sure they are sufficiently prepared to deal with an unlikely accident or malfunction. Denison’s objective is to utilize existing emergency response teams from other operations prior to drawing on community-based resources. In the unlikely event that this were to occur, and KML resources were drawn upon, the Agreement negotiated between provides the foundation for discussions in respect of such incidents. See Section 2 for information pertaining to the above programs.				
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	KML sees limited mention that this project has respected the intent of the United Nations Declaration on the Rights of Indigenous People or the Recommendations of the Truth and Reconciliation Commission. There is limited opportunity for this project to review the implications of UNDRIP and TRC and how this project will cause to effect for the Indigenous rights bearing members of Pinehouse. This is not case for other agencies providing information for this project. KML request advocacy to increase education for external agencies on the need to develop greater understanding of UNDRIP and TRC calls to actions. These agencies can be contractors, regulators, and managers within the companies. This process could be developed if the agencies co develop a centre of excellence in Pinehouse.	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #100)	Denison respects KMLs perspectives on the matter and understands this is not an industry only prerogative. As outlined in Denison’s Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities.	Denison is committed to, as described in Section 13, providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities.	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	Interest with potential contracts and business opportunities for northern Indigenous companies.	ROC 105 ROC 114 ROC 118 ROC 444	The Project will create employment and business opportunities and increase income for workers and businesses in the LSA, RSA, and beyond the RSA during all phases of the Project. Denison has estimated a workforce during the two-year Construction period of 300 people and during the Operation phase 180 people are expected to be employed to operate the ISR wellfield and processing plant, including supporting activities. Mineral sector positions are typically considered to be higher paying than many other industrial positions. Residents and communities in the LSA will be given first priority for employment and training and business opportunities, followed by Indigenous and / or other communities in the RSA.  The Agreement currently being negotiated between Denison and KML outlines specific commitments for KML participation in economic opportunities associated with the Project, including business opportunities as deemed appropriate by KML.  See Section 13 for a summary of local, provincial, and federal Project benefits and Denison’s approach to employment, training, and business participation opportunities for communities.	Denison is committed to, as described in Section 13, providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities.	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	Expressed a need for building capacity locally in terms of training and education, emergency response, waste management, and additionally expressed a want of local procurement and industry supporting infrastructure.	ROC 444	As outlined in Denison’s Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. The Agreement currently being negotiated between Denison and KML outlines	Denison is committed to, as described in Section 13, providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities.	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse



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				<p>specific commitments for KML participation in economic opportunities associated with the Project, including commitments for ongoing education and training as deemed appropriate by KML, support to the vision of local industry supporting infrastructure.</p> <p>In terms of building capacity locally for emergency response and waste management, Denison supports KML’s vision on these items where it makes sense and is possible. The Agreement provides a framework for future possibilities such as these.</p>	<p>In terms of building capacity locally for emergency response and waste management, Denison supports KML’s vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.</p>			and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions	Concern and interest in economic opportunities associated with Project and education and training to facilitate access and participation by community members.	ROC 62 ROC 105 ROC 388 ROC 444 ROC 620 ROC 623	<p>Denison has estimated a workforce of 300 during the two-year Construction phase and 180 during the Operation phase. Mineral sector positions are typically considered to be higher paying than many other industrial positions. Residents and communities in the LSA (ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village) will be given first priority for employment, training, and business opportunities, followed by residents and communities in the RSA (Northern Saskatchewan Administrative District).</p> <p>Mitigation and enhancement measures will be implemented by Denison to enhance the positive effects of the Project on employment and training, income, traditional economy, and business opportunities and minimize adverse effects including:</p> <ul style="list-style-type: none"><li>-A Human Resource Development Plan to initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities;</li><li>-Establishment of a procurement approach through all phases of the Project, focusing on businesses based within the LSA communities, followed by Indigenous and / or businesses in the RSA;</li><li>-Negotiation with the Province of Saskatchewan to develop the Project’s Surface Lease Agreement and Human Resource Development Agreement.</li></ul> <p>The Agreement currently being negotiated between Denison and KML outlines specific commitments for KML participation in economic opportunities associated with the Project, including in relation to ongoing education and training as deemed appropriate by KML.</p> <p>See Section 13 for a summary on local, provincial, and federal Project benefits and Denison’s approach to employment, training, and business participation opportunities for communities.</p> <p>See Section 13 for information regarding employment, employment opportunities, and career growth for community members.</p>	<p>Denison is committed to, as described in Section 13, providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison’s business activities. General discussions to continue as part of ongoing dialogue.</p>	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse	Health and socio-economic conditions; current use of	KML is concerned with cumulative impacts from historical legacy exploration and mining practices. Not specific to Denison, Cameco or Orano, KML notes that land users have often found remnants of past poor exploration practices which are now affecting our continued	KML and NVP Public Comments (February 17,	Denison conducted a cumulative effects assessment, which included the Highway 914 extension project, on categories the Atmospheric and Acoustic Environment; Geology and Groundwater; the Aquatic Environment; the Terrestrial Environment; Human Health; Land and Resource Use; Quality of Life;	Denison is committed to, as described in Section 13, providing Indigenous people and businesses with sustainable economic	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
and Kineepik Métis Local	lands and resources for traditional purposes	land use. The abandoned camps and industrial and domestic waste left with no known program for clean up are the most significant of these remnants. They would like the EIS to host in partnership with provincial government regulators to host a conversation on progressive reclamation of these legacy sites. This conversation should prioritise the community capacity and an environmental agent for process that occur on our traditional territories. This conversation could include changing the policies of waste (future waste) being brought into the NAD. KML's contention is that waste that is brought into the region should be removed entirely from the region. The need for a regional waste management facility or a transfer station must be developed in partnership with KML. As noted in their summary of Primary Concerns, this includes a requirement for: <ul style="list-style-type: none"> <li>• Immediate efforts to build capacity in a regional waste management operation within or near the community. To build current and future expertise in domestic waste, special waste, recycling, and the development of a transfer station in Pinehouse to support all mining activity including current operation and exploration.</li> </ul>	2023) (KML and NVP Public Comment #98)	and Economics. Denison respects and understands KML's concern about the cumulative effects in the region, particularly in relation to access to traditional lands and resources in correlation with industrial and mining developments. The residual effects of the Project are expected to interact with the residual effects of other projects and activities in the ILRU RSA, resulting in potential cumulative effects to Indigenous land use activity in the area. This is largely due to the proposed Highway 914 extension project. See Section 16 for a summary of the cumulative effects assessments for each category above. As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.	opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.			Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions; current use of lands and resources for traditional purposes	While one project or mining operation does not materially affect KML's land use practices, the substantial and growing projects and mineral exploration activity severely limits their ability to practice land use for the region north of Haultain River. KML land users are now experiencing loss of use with some areas leading to complete exclusion for food sovereignty and traditional activities. As an example of this, hunting practices currently use high powered rifles to engage with big game including moose, bear, deer, and caribou in the area. How will Denison ensure the community can continue to practice this method of food gathering in a safe method?	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #99)	In 2018, KML approached Denison to support a land use mapping initiative in the Project area. The 2018 study builds on existing land use maps, completed in 2011. A verification meeting was held in late 2018 to make sure no geographic data gaps existed and that the results speak for the whole community. In 2022, KML prepared a document to voice their perspectives on Project VCs and to provide a record for EIS development. Based on 12 community engagement sessions and review of the land use maps, KML explained their unique social, cultural, and historical context, expressed a general consensus of support for the Project, and described issues and concerns. See Section 3 for information on IK and LK and how this information was integrated throughout the EIS. See Section 11 for information on how the Project will interact with land and resources including how potential effects will be mitigated.	N/A	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Health and socio-economic conditions; current use of lands and resources for traditional purposes	Potential impacts to KML are from increased development and access to their territory. Current provincial regulation of hunting, fishing, tourism, resources development and increase human traffic will affect and limit our ability to practice our protected rights. Western business with greater acumen may displace economic activity as they note that they are still evolving their understanding of the industry business practices. KML request further study on how current provincial regulations including opportunity for co-management so lessen the impacts from this project and from increased encroachment.	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #101)	See response to KML and NVP Public Comment #99. The Agreement negotiated between Denison and KML outlines specific commitments for KML participation in environmental monitoring associated with the Project.	General discussions to continue as part of ongoing dialogue. The Agreement negotiated between Denison and KML outlines specific commitments for KML participation in environmental monitoring associated with the Project.	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse	Health and socio-economic conditions;	KML note that loss of language can be correlated to the introduction of the Saskatchewan Uranium Industry. Prior to the industry development, Pinehouse was among the most	KML and NVP Public Comments	Denison respects the concern raised by KML regarding language and culture related to working at an industrial operation. Denison and KML will be working on specific items of interest to mitigate these types of concerns through private	Mitigation measures associated with potential effects to cultural continuity (including knowledge	Resolved - agreement	As per letter dated	General discussions to continue

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and Kineepik Métis Local	Physical and cultural heritage	fluent speaking communities in northern Saskatchewan. All children in Pinehouse spoke Cree with limited English and French capacity. Since the collateral effect of industry became the prominent community discourse the support for Cree language was diminished and marginalized by industry as English is the primary language used by industry. KML and NVP are actively working to determine how to stop the current language extinction process with strategies around creating more resources for culture and language. KML is leading the process for recovering from this loss. KML are using our own source revenue and resources to bring pride in the language and culture for community members of KML. KML will continue to bring this attention to all proponent activities that occur on the KML territory for KML are all are responsible to remove the effects of colonisation and institutional racism.	(February 17, 2023) (KML and NVP Public Comment #94)	contractual arrangements, which may include specific mitigation and accommodation measures in this respect. Mitigation measures associated with potential effects to cultural continuity (including knowledge transfer and language) are described in Section 12.1.5 and include: <ul style="list-style-type: none"> <li>• working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities;</li> <li>• implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation</li> <li>• Using a commuter rotation system has also shown to be effective in allowing Indigenous employees continued opportunities to spend time on the land, and important factor in the transmission of knowledge and language (see Section 11 for a description of potential effects to land use).</li> </ul> In discussions with Indigenous Communities of Interest since the filing of the draft EIS, it has become apparent that Denison should add additional commitment / mitigation measure in relation to this area of interest, as follows: <ul style="list-style-type: none"> <li>• Encouragement to speak languages of choice while at site, except during safety sensitive situations.</li> </ul> Section 12.1.5 of the final EIS will be updated to include the additional commitment / mitigation measure in relation to culture and language, as follows: <ul style="list-style-type: none"> <li>• Encouragement to speak languages of choice while at site, except during safety sensitive situations.</li> </ul>	transfer and language) are described in Section 12.1.5 and include: <ul style="list-style-type: none"> <li>• working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities;</li> <li>• implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation</li> <li>• Using a commuter rotation system has also shown to be effective in allowing Indigenous employees continued opportunities to spend time on the land, and important factor in the transmission of knowledge and language.</li> </ul> Encouragement to speak languages of choice while at the site, except during safety sensitive situations, will be made.	reached by both parties	December 5, 2023	between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Other	Waste generated from the operation, construction and maintenance of mines and exploration projects need to be better understood by the community. KML is of the view that waste management may represent the greatest source of environmental liability arising from this project and the mining industry in northern Saskatchewan in general. KML request that planning for waste management including capacity for Pinehouse to host a waste management company and a transfer station in Pinehouse to be considered. As a community that uses this land for food, shelter and culture KML want the capacity and responsibility to manage waste for this project and the industry in general and prepare for future development.	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #102)	As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.	Denison is committed to, as described in Section 13, providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Other	KML describes Indigenous Economic Leakage and Triggered Response Capacity as concerns: <ul style="list-style-type: none"> <li>• Indigenous Economic Leakage: the lack of capacity within Indigenous communities like Pinehouse prior to massive development projects like uranium mining operations. No ability in existing community development to capitalize on industrial activity in their areas because of historic colonization and racism. There are limited businesses, stores, materials and infrastructure within community to support and build upon.</li> </ul>	KML and NVP Public Comments (February 17, 2023) (KML and NVP Public Comment #102)	See response to KML and NVP Public Comment #102.	Denison is committed to, as described in Section 13, providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste	Resolved - agreement reached by both parties	As per letter dated December 5, 2023	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as

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		<ul style="list-style-type: none"><li>• Triggered Response Capacity: the respond required by the Indigenous people of KML to meet the need of industry. The community is required to change focus away from Indigenous community needs to focus on the needs of Industry. This includes time to respond to the industrial education, safety protocols, regulatory responses. The need as a community to participate in the Duty to Consult on exploration requests, feasibility studies, Environmental impact studies, negotiate agreements, industry training requirements. All of this removes the community ability for practicing Indigenous cultural activities, less time of Cree language retention. This response increases as the Collateral Effect increase. It is acknowledged by KML that these are factors are exacerbated by an additional mine. As noted in their summary of Primary Concerns, this necessitates:</li><li>• Systemic increases in the use of services in Pinehouse including COOP store and PBNLP, Pinehouse Housing Corporation, Pinehouse Fishing COOP and Wild Rice, and KML Métis Local to prevent the continuation of Indigenous economic leakage.</li><li>• Consideration to build industry supporting infrastructure such as warehousing, hotels, bulk fuels parts and mining necessities in Pinehouse to support community development and to stop the Indigenous economic leakage which has occurred over the last 50 years of development.</li></ul>			management, Denison supports KML's vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.			part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Other	Interest in implementation of appropriate engagement process activities. Concern was raised over the approach to consultation with others (other communities) and questions raised on whether a Collaborative Agreement was possible during operations.	ROC 106 ROC 114 ROC 118 ROC 135 ROC 388 ROC 444	<p>Denison has identified key objectives respecting Indigenous engagement associated with the Project:</p> <ul style="list-style-type: none"><li>-Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency.</li><li>-Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion.</li><li>-Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects.</li></ul> <p>Engagement activities for the Project can and will evolve over time, as information is gathered that is pertinent to Denison's understanding of the Interested Parties and their relationship to, and interest in, the Project. At present, Denison has an Exploration Agreement with KML and continues to engage with KML and NVP with respect to the Wheeler River Project.</p> <p>The Agreement currently being negotiated between Denison and KML is demonstrative of Denison's responsiveness to the request from KML for such an agreement.</p> <p>See Section 4 for additional information on the consultation process.</p>	N/A	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.

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Northern Village of Pinehouse and Kineepik Métis Local	Other	Interest in information about current market conditions and overall viability of the Project.	ROC 105	<p>Denison has identified that there is current and future market demand for uranium, the primary raw material for nuclear fuel generation. The Project can address gaps in annual global uranium supply and the use of uranium in nuclear power plants can contribute to net-zero goals, and this can be achieved while making a meaningful contribution to the Canadian economy. The Project was considered in relation to technical feasibility, economic feasibility, and land use criteria to determine viability of the Project.</p> <p>See Section 2 for information about Project components and purpose.</p>	N/A	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Other	<p>Feedback on mining options and technical questions were asked on the different methods of mining.</p> <p>The community provided comments on the different on-site road options.</p>	ROC 2	<p>Project components include: ISR, Drilling, Freeze Wall, Wellfield, Processing, Water Management, Waste Management, Access and Transportation, Power, Support Facilities, Project Area, Project Activities, Ancillary Projects, GHG Emissions, Project Schedule, Project Benefits, Project Design Features, Management System, and Project Alternatives.</p> <p>Through an alternative means assessment, Denison considered options in relation to access and transportation. The access road alignment will follow part of the existing exploration access road, stream crossing structures will use clear span bridges, and worker transportation will be air transport to a) nearby Cameco operations or, b) a new airstrip constructed and operated by Denison.</p> <p>Denison incorporated the feedback provided on road options select the current road alignment for the Project.</p> <p>See Section 2 for information and technical detail pertaining to Project Components and Project alternatives.</p>	N/A	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Other	Expressed a need for industrial grade improvements between Highway 2 and the Key Lake Gate to support the increase in heavy traffic.	ROC 444	<p>Highway improvements are not within Denison’s jurisdiction and are not considered in the EIS for the Wheeler River Project. However, Denison notes KML’s perspective of increased traffic volumes and subsequent desire for highway improvements.</p> <p>On Highway 914 between Key Lake and Pinehouse, Denison anticipated that road users would see an increase between 16% and 40% over the life of the mine. Trucks travelling on this section of highway will increase from 35 to 53 at peak operational times.</p> <p>Denison’s vision in respect of this concern is that Denison and KML work together as partners in discussions about highways with the Provincial Government.</p> <p>However, in respect of actions Denison can undertake regarding traffic along the road at times important for the undertaking of cultural activities, Denison commits to:</p> <p>1) Assisting KML with the clear identification of the forthcoming culture camp along highway 914 (clear signage)</p> <p>2) Having Project vehicle slow down to 40km/hr from mid-August to mid-October, during the times when KML members may be using the portion of the road near the culture camp. To be specific, this includes 2.5km before the entry</p>	<p>Denison’s vision in respect of this concern is that Denison and KML work together as partners in discussions about highways with the Provincial Government.</p> <p>However, in respect of actions Denison can undertake regarding traffic along the road at times important for the undertaking of cultural activities, Denison commits to (Section 12):</p> <p>1) Assisting KML with the clear identification of the forthcoming culture camp along highway 914 (providing clear signage)</p> <p>2) Having Project vehicle slow down to 40km/hr from mid-August to mid-October, during the times when KML members may be using the portion of the road near the</p>	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.



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				into the culture camp, and 2.5km after the entry into the culture camp. See Section 2, Appendix 2-B for more detail pertaining to traffic volumes.	culture camp. To be specific, this includes 2.5km before the entry into the culture camp, and 2.5km after the entry into the culture camp.			
Northern Village of Pinehouse and Kineepik Métis Local	Other	<p>Interest in information and direct participation in monitoring baseline and effects.</p> <p>Concern that project should have independent monitoring for the Project and that information from this be shared with communities.</p>	ROC 2 ROC 105 ROC 444	<p>An Environmental Protection Program will be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets that Denison may set. The program would be developed in a manner that aligns with the ISO 14001 EMS Standard. Aspects of the Environmental Protection Plan will include:</p> <ul style="list-style-type: none"><li>-Management and Monitoring of Emissions</li><li>-Liquid Effluent Monitoring Plan</li><li>- Air Emissions Monitoring Plan</li><li>- Groundwater Monitoring Plan</li><li>- Environmental Monitoring Plan</li><li>- Woodland Caribou Management Plan</li></ul> <p>As the Indigenous Community of Interest with a residential community most proximal to the Project, Denison has committed to collaborating with Kineepik Métis Local on a community specific monitoring regime, suited to their interests and needs in order to provide transparent information to discourage avoidance of the area and alleviate perceived concerns about potential impacts. As part of this program, Denison and KML will be sharing information in an agreed-upon fashion, about agreed-upon species of interest. Denison expects that important country foods harvested for food and cultural purposes (i.e., moose, fish species, etc.), surface water quality, and other areas of interest will form part of this monitoring program, including the potential to report on wildlife-vehicle mortality or other such areas of potential concern as they evolve over time.</p> <p>See Section 16 for a summary of monitoring and follow-up programs.</p>	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion.	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.
Northern Village of Pinehouse and Kineepik Métis Local	Other	Interest for information about type and how chemicals and other hazardous products would be transported, and whether an emergency response team would be ready to respond.	ROC 444	<p>Denison will establish a Transportation of Dangerous Good Program, intended to provide for the safe transport of goods by conforming to all applicable laws, regulations, company policies, and procedures. The Transportation of Dangerous Goods Program applies to all modes of transport and all locations where Denison assumes care and control of the materials.</p> <p>Denison will establish an Emergency Preparedness and Response Program to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. Emergency Preparedness and Response Program would be developed consistent with guidance provided by CNSC in REGDOC-2.10.1, Nuclear Emergency Preparedness and Response (CNSC 2016).</p> <p>Increased pressure on emergency services is most likely to stem from an accident or malfunction on Highways 914 or 165. The extent to which these</p>	N/A	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.



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				<p>changes could affect any given community would depend on the nature of the accident or malfunction. Accidents and malfunctions for the Project were determined to (generally) have a highly unlikely to unlikely probability of occurrence, with an overall risk rating of low to moderate; however, the severity of accidents and malfunctions was determined to be minor to major. If such an event were to occur, local resources may be called upon to provide support, which may result in a call to fire, RCMP, or ambulance services depending on the nature of the event. Denison will provide any necessary training and/or equipment to local first responders to make sure they are sufficiently prepared to deal with an unlikely accident or malfunction.</p> <p>Denison’s objective is to utilize existing emergency response teams from other operations prior to drawing on community-based resources. In the unlikely event that this were to occur, and KML resources were drawn upon, the Agreement currently being negotiated between provides the foundation for discussions in respect of such incidents.</p> <p>See Section 2 for information pertaining to the above programs.</p>				
Northern Village of Pinehouse and Kineepik Métis Local	Other	Questions and clarifications on ISR mining methodology, including freeze wall technology and Project power requirements.	ROC 62 ROC 604 ROC 620 ROC 623	<p>Project components include: ISR, Drilling, Freeze Wall, Wellfield, Processing, Water Management, Waste Management, Access and Transportation, Power, Support Facilities, Project Area, Project Activities, Ancillary Projects, GHG Emissions, Project Schedule, Project Benefits, Project Design Features, Management System, and Project Alternatives.</p> <p>See Section 2 for information and technical detail pertaining to Project Components and Project alternatives.</p> <p>Engagement activities for the Project can and will evolve over time, as information is gathered that is pertinent to Denison’s understanding of the Interested Parties and their relationship to, and interest in, the Project. At present, Denison has an Exploration Agreement with KML and continues to engage with KML and NVP with respect to the Wheeler River Project.</p> <p>See Section 4 for additional information on the consultation process.</p>	N/A	Resolved - agreement reached by both parties.	Email dated June 10, 2023 and acceptance of response	General discussions to continue between Denison and the Northern Village of Pinehouse and Kineepik Métis Locals as part of ongoing engagement.

Appendix C-3: SML Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Sipishik Métis Local #37	Current use of lands and resources for traditional purposes	Interest in understanding how IK and history is integrated in EIS.	ROC 62	<p>Denison has supported several processes to aid community-led collection of IK. Section 3.4.2 provides detail on these processes and outcomes. Studies and reports incorporated throughout the Draft EIS include those provided by ERFN, KML, and YNLR on behalf of the Athabasca Denesųliné. A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study. Denison will continue to consider and integrate results from and forthcoming materials provided by communities as it advances the EIS process.</p> <p>Denison has recorded and stored information regarding IK, LK and engagement activities in an Engagement Database. Within the database, records are given unique identification numbers. These numbers are referenced throughout the EIS, but particularly in Parts II and III, to indicate where specific information from the database has been integrated into the assessment Within each section of Part II and Part III are subsections titled “Influence of Indigenous Knowledge, Local Knowledge and Engagement on the Assessment”. Within these subsections are summary tables that provide additional details related to each one of the unique identification numbers referred to in that section.</p>	Section 3 provides information on IK and LK and how this information was integrated throughout the EIS. Indigenous Knowledge has been integrated throughout the EIS and a section on the Influence of Indigenous Knowledge, Local Knowledge, and Engagement is provided in the methodology for sections. For example see Section 11.1.2 and Section 11.2.2 for further details on how Indigenous Knowledge, Local Knowledge, and Engagement influences Land and Resource Use.	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Sipishik Métis Local #37	Current use of lands and resources for traditional purposes	It was noted that development of a TK map for the community had not been undertaken due to funding pressures, but that the traditional territory of the people of Beauval was typically described to reach from Tipppo Lake east of Beauval to the Primrose Air Weapons range to the west and north to the Patterson Lake area.	ROC 116	Denison understands that the Métis Knowledge Study, undertaken by MN-S on behalf of the Locals who have delegated the Duty to Consult to it, would be representative of the Sipishik Métis Local #37. As a result, please see information pertaining to Interests, Issues and Concerns in relation to the MN-S and the associated Métis Knowledge Study.	N/A	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Sipishik Métis Local #37	Health and socio-economic conditions	Concern with racism and other factors in workplace affecting employee retention.	ROC 62	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website.	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.		resolution on these issues.		
Sipishik Métis Local #37	Other	Question about credentials required to undertake environmental monitoring. Interest in having transparency of environmental monitoring data for operating mines.	ROC 62	Public Information and Disclosure (CNSC 2018) sets out requirements and guidance for public information and disclosure for licensees and applicants of Class I and Class II nuclear facilities, and uranium mines and mills, for all lifecycle phases. The primary goal of the public information program, as it relates to the licensed activities, is to ensure that information related to the health, safety and security of persons and the environment, and other issues associated with the lifecycle of nuclear facilities are effectively communicated to the public. Denison would meet all requirements set out in this REGDOC, including the development of an appropriate public information program and disclosure protocol.	N/A	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Appendix C-4: PML Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Patuanak Métis Local #82	Other	Patuanak Métis expressed interest in pursuing a relationship with Denison as this had not been previously pursued with companies prior.	ROC 142	Before 2019, Denison undertook engagement activities in the Patuanak area (including with PML more broadly through work done in relation to the ERFN Wapachewunak reserve, consistent with the strong interconnections in the area. In mid-2019, Denison was advised by the Province of Saskatchewan of the interest of PML in relation to the Project. As a result, beginning June 2019, Denison began engaging directly with PML. This included sending correspondence to PML about the Project description, having informal discussions pertaining to their interests in the Project, and hosting a site visit (2019) and a meeting jointly coordinated by the MN-S (2019). See Section 4.3.2.4 for more information. In 2019, the PML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing PML in respect of engagement with Denison for the Project. Since then, Denison has been engaging with MN-S on behalf of PML and other Métis Locals. For details of this engagement, see Section 4.3.4.1. For engagement that occurred with PML in 2019. These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined in Section 4.2.1.	Patuanak Métis Local #82 has delegated the duty to consult to the MN-S.	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Patuanak Métis Local #82	Other	Questions and clarifications on ISR mining methodology, including freeze wall technology.	ROC 62	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface.</p> <p>Section 2.2.1.3 provides information on freeze wall technology. The freeze wall is intended for tertiary containment of mining solution to support a defence in depth strategy as additional, site-specific data is obtained on hydraulic containment. The freeze wall around the mining area will extend from the surface to the basement rock, isolating the mining area from regional groundwater. The freeze wall is expected to be a minimum of 10 m thick, be installed 25m away from the uranium deposit, and extend 30 m into the basement rock. Data from the groundwater monitoring network installed in and around the wellfield and freeze wall will make sure the freeze wall is meeting design specifications.</p>	N/A	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Patuanak Métis Local #82	Other	Questions were asked regarding malfunctions during the process.	ROC 62	A standalone Accidents and Malfunctions (A&M) assessment was completed and is summarized in Section 14 of the EIS (full report is Appendix 14-A of the EIS). The A&M assessment considered almost 70 accident scenarios including many that would relate to the unplanned release of chemicals and radiation to the environment with potential to effect country foods. Specific scenarios including the release of chemicals and radiation to the aquatic environment and to the terrestrial environment adjacent to the ERFN and KML culture camps located along Hwy 914. The overall risks in consideration of likelihood and consequence were characterized as low. The assessment concluded that with planned engineering / environmental design features, mitigation measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical.	N/A	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Patuanak Métis Local #82	Other	Questions were asked regarding if the wastewater would be treated.	ROC 1	<p>Wastewater will be treated as part of water management for the Project. Treated Effluent Monitoring and Release Ponds in Section 2.2.3.9 of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond.</p> <p>Denison expects the Provincial Approval to Operate a Pollutant Control Facility will contain specific effluent quality limits and monitoring to confirm effluent quality meets the approved limits. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.</p>	Wastewater will be treated as part of water management for the Project. Treated Effluent Monitoring and Release Ponds in Section 2.2.3.9 of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Appendix C-5: BNDN Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes	Interest in sharing IK and history and integration of this information in EIS.	ROC 479	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date.	Section 3 provides information on IK and LK and how this information was integrated throughout the EIS. Indigenous Knowledge has been integrated throughout the EIS, for example 11.1.2 and Section 11.2.2, provides further details on the influence of Indigenous Knowledge, Local Knowledge, and Engagement on Land and Resource Use.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to come to resolution.	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes	Concerns about adequate consideration of BNDN IK and Traditional Ecological Knowledge.	ROC 479	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date.	Section 3 provides information on IK and LK and how this information was integrated throughout the EIS. Indigenous Knowledge has been integrated throughout the EIS, for example 11.1.2 and Section 11.2.2, provides further details on the influence of Indigenous Knowledge, Local Knowledge, and Engagement on Land and Resource Use.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
						forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to come to resolution.		
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes	Concerns about the Project site and the ability for BNDN members to access the site.	ROC 479	Section 11 provides information about site access and current use of the area for undertaking Indigenous and/or Treaty Rights. Access restrictions north of the Key Lake gate mean that use is restricted to lease holders (e.g., cabin owners) and select Indigenous communities. The Project does not propose any changes to the current access to Highway 914 north of Cameco's Key Lake Operation gate. Denison has completed an environment assessment to understand Project impacts on the environment. The assessment considers potential impacts to traditional and other land use activities, including fishing. Denison has determined that there will be no significant impacts as a result of Project activities.	N/A	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to come to resolution.	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes	Concern with effects to hunting, trapping, gathering, and availability of traditionally important species.	ROC 479	Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take a distinctions based approach (i.e., the potential impact on each Indigenous community is not evaluated	N/A	Based on Denison's understanding of the concern or comment, Denison has provided	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				separately), but rather on the key indicators and associated measurable parameters. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal.		background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to come to resolution.		remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes	Concern with effects to wildlife and wildlife habitat from Construction and Operation. Caribou, in particular, are at risk from loss of habitat and disturbance.	ROC 479	<p>The Project Area was delineated to capture all direct, and most indirect, likely adverse effects on caribou; as this is the zone of influence most likely to affect caribou in the vicinity of the Project (i.e., in the vicinity of human activity, equipment use and vehicle use). The Project Area (169.6 ha) is the direct footprint of proposed Project infrastructure (74.8 ha) with a buffer applied, thereby representing the area of maximum physical disturbance. The Project Area is not VC-specific, but consistent throughout the EIS.</p> <p>The Wildlife LSA was designed to capture the majority of the Project effects. The LSA extends beyond Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. Section 9 describes how consideration of potential effects to wildlife and wildlife habitat are considered within the EIS. In regard to caribou, Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment.</p>	Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
						come to resolution.		
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes	Concern with effects to Indigenous fisheries associated with changes to the existing aquatic ecosystem including potential disruption of spawning sites and fish habitat.	ROC 479	Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take a distinctions based approach (i.e., the potential impact on each Indigenous community is not evaluated separately), but rather on the key indicators and associated measurable parameters. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal.	N/A	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to come to resolution.	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes; Other	<b>BNDN Comment February 28, 2023</b> The Project is located within the treaty and ancestral lands of BNDN and maintains both current and historical significance to the community. BNDN Indigenous Knowledge, Land Use and Occupancy are not currently considered within the EIS. Should the Project proceed without the consideration of BNDN's Knowledge, Land Use and Occupancy, it may cause irreparable loss of culturally significant sites and access to resources that the community depends upon. It may also contribute to a loss in cultural transmission. Request/recommendation: a) Denison should provide BNDN with funds to conduct a community-led Indigenous Knowledge, Land Use and Occupancy Study for consideration	BNDN Public Comment February 28, 2023 (BNDN Public Comment #2)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison acknowledges and understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities occurring in and around the Project in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and/or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date. Project effects have been mitigated for the most intensive resource user(s), irrespective of affiliation. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most	Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. Therefore, Denison does not anticipate separate funding for BNDN at	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>within the EIS process. At minimum, the Study should consider BNDN’s Indigenous Ecological Knowledge, commercial and non-commercial harvesting practices, and cultural occupation of the region (including historical sites). The Study should also consider cultural transmission, information about the history of the area and BNDN community members’ perspectives on the Project.</p> <p>b) The community-led Indigenous Knowledge, Land Use and Occupancy Study should be a component of a broader process agreement between BNDN and Denison that serves as a pathway for obtaining BNDN’s consent for the Project.</p> <p>c) Denison should work with BNDN to consider the appropriate integration of the results into all aspects of the EIS and management/monitoring plans, as well as any additional appropriate mitigation and/or accommodation measures.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>While the proponent has requested Indigenous Knowledge from BNDN, they have not made any resources available for BNDN to collect it, nor has the company engaged in any efforts to sign any agreements that provide assurances around confidentiality. BNDN lacks capacity and requires such resources and assurances to be able to provide Indigenous Knowledge; further, it is standard procedure for proponents to provide such financial capacity. The project is located in a critically important area for BNDN; Cree Lake and surrounding areas fosters important caribou habitat that BNDN members rely on. BNDN carries out rights protected activities throughout the project location, which falls within BNDN’s treaty and ancestral lands. BNDN’s rights and interests will be impacted by the project if it is approved.</p> <p>I) BNDN requires capacity funding from the proponent to conduct a community-led and project-specific Indigenous Knowledge study so BNDN can</p>		<p>proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. Therefore, Denison does not anticipate separate funding for BNDN at this time. Further, the assessment has been completed based on Valued Components (VCs), including the VC of Indigenous Land and Resource Use. Key indicators for Indigenous Land and Resource Use include: • resource availability for harvesting subsistence resources (distribution and abundance of animals, plants, and wildlife for harvest and suitability of animals, plants, and wildlife for consumption); • land/water availability to practice traditional land use (TLU); and • perceived suitability of lands and resources therein. Measurable parameters are identified for each of the key indicators, as presented in Table 11.1-1 of the EIS. The assessment does not take a distinctions based approach (i.e., the potential impact on each Indigenous community is not evaluated separately), but rather on the key indicators and associated measurable parameters. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any BNDN uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal. As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects, wherever possible.</p>	<p>this time. Measurable parameters are identified for each of the key indicators, as presented in Table 11.1-1 of the EIS. As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects, wherever possible.</p>			

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		evaluate the impacts the project will have on BNDN and so the results of the study may inform the project and its evaluation. BNDN requires the EIS to be updated based on the results of BNDN’s Indigenous Knowledge Study. BNDN must be engaged on how its results are used to update the EIS.						
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes; Other	<b>BNDN Comment February 28, 2023</b> The Proponent has committed to using seed that is certified weed-free, with a valid “Certificate of Seed Analysis” for the revegetation process. Request/recommendation: -BNDN recommends that, in addition to using weed-free certified seeds, consultation occur with Indigenous communities, including BNDN, to select an appropriate seed mix that closely mimics the pre-construction plant community and includes plants of medicinal and traditional importance. This could be done by either sourcing seed mix from a local seed distributor, or using wild seed propagated from plants collected from the Project Area. In addition, the seed mix should contain native plant species only.  <b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.  <b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #57)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  Specific details of the seed mixture and overall reclamation plan will be developed through updates to the Decommissioning Plan, on which Interested Parties will be provided opportunity for review and input. The decommission plan in the EIS is a conceptual plan. A preliminary decommissioning plan will be included with licence application and reviewed and updated during operations. Prior to executing Decommissioning activities, Denison shall prepare and submit a detailed decommissioning plan to regulators for acceptance, which builds on the preliminary decommissioning plan. Additionally, Denison has partnered with the University of Saskatchewan and Northwest Communities Environmental Services (an Indigenous-owned environmental company) under the Developing Eco-Restoration Together (DERT) program. This unique project aims to co-create ecological restoration practices that centre Indigenous peoples, worldviews, and values while also braiding knowledge from the land, Indigenous knowledge, and western science. The project is supported by the three partners but is ultimately guided by the Indigenous Project Advisory Board, and the Community Liaison/Education Coordinator. Through restoration trials, community engagement, and various planting techniques, Denison, with their partners are seeking to return ecosystem functions in areas where they have been previously disturbed (e.g., exploration cutlines). Through collaboration with community members, University of Saskatchewan, industry partners, two graduate students, and local youth, this project is expected to ultimately inform the creation of a framework for effective restoration practices in northern Saskatchewan that centre on caribou and Indigenous communities.	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes; Other	<b>BNDN Comment February 28, 2023</b> The EIS uses a 500 m buffer around the Project Area to define indirect habitat alteration for moose (Figure 9.3-9). This includes habitat alteration from sensory disturbance such as anthropogenic noises, vehicle traffic, aircraft traffic, and increased predator access. However, the EIS references scientific research that states that roads and vehicle traffic can affect moose habitat selection, resulting in habitat avoidance up to 1 km from roads (Shanley and Pyare 2011). Furthermore, the EIS acknowledges uncertainty	BNDN Public Comment February 28, 2023 (BNDN Public Comment #58)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  It is Denison's and their terrestrial SME's opinion that the approach used to characterize moose habitat alteration provided a sufficient basis for conducting the ungulate (VC) moose (KI) effects assessment (draft EIS Section 9.3). The Project Area had a 500 m buffer applied to account for indirect effects/habitat alteration; this area is within the wildlife LSA. Availability of habitat is not a key limiting factor for moose populations.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>concerning the available background and baseline information used to identify available moose habitat in this assessment.</p> <p>Without considering a larger avoidance buffer (as demonstrated in various research) around proposed anthropogenic disturbances, BNDN believe that the EIS underestimates the potential extent of moose habitat alteration. To be more conservative, a 1000 m buffer should be used surrounding the Project area.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>- BNDN recommends using a 1000 m buffer surrounding the Project Area to measure the extent of moose habitat alteration. BNDN believe this analysis will provide a more accurate and conservative outcome with respect to potential project impacts to moose.</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>The response does not adequately address BNDN’s concern that the 500 m buffer underestimates the extent of moose habitat alteration. BNDN reiterates the following points.</p> <p>I. The selection of a 500 m buffer appears arbitrary and is not substantiated by peer-reviewed literature. Research (Shanley and Pyare 2011) indicates that moose may avoid habitat up to 1 km from roads and vehicle traffic. Furthermore, the proponent cites professional opinion as justification for using a 500 m buffer. However, BNDN requires reassurances that are substantiated by peer-reviewed scientific literature rather than subjective interpretation.</p> <p>II. The EIS acknowledges uncertainty in available moose habitat data, yet the response does not clarify how this uncertainty was factored into the assessment or whether a precautionary approach was taken.</p> <p>III. Habitat selection is not simply based on availability but also on predation avoidance. Moose tend to avoid areas with increased risk of predation. Roads, trails, and clearings created by mining facilitate wolf</p>						



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		movement, making predation more efficient and therefore reducing the available moose habitat. The proponent’s response minimizes this risk by focusing only on habitat availability, failing to acknowledge that increased predator access and moose displacement fundamentally alter predation dynamics. BNDN reiterates our 1,000 m buffer be considered to provide a more conservative and ecologically relevant assessment of moose habitat alteration. Without further justification, the 500 m buffer appears insufficient to capture the full extent of indirect impacts.						
Birch Narrows Dene Nation	Current use of lands and resources for traditional purposes; Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>The EIS uses a 500 m buffer around the Project Area to define Woodland Caribou habitat alteration from sensory disturbance. However, scientific research expects up to 5 km (or greater) of Caribou avoidance around mining Projects, and that related semi-permeable barriers, such as roads, likely exacerbate this effective habitat loss [(Smith et al. 2000; Dyer et al. 2001; Courtois et al. 2008; Vistnes and Nellemann 2008; Nagy 2011; Polfus et al. 2011; Leblond et al. 2011, 2013; CPAWS Wildlands League 2013; Johnson et al. 2015)]. Without considering a larger avoidance buffer (as demonstrated in various research) around proposed anthropogenic disturbances, we believe that the EIS underestimates the potential extent of Caribou habitat alteration.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>- BNDN requests that the Proponent present the extent of caribou habitat alteration/loss from the proposed Project within a range of uncertainty informed by scientific research.</li></ul> <p>Specifically, the percent alteration of habitats must be presented using a 500 m (low end) up to a 5,000 m (high end) buffer. BNDN believe this analysis will provide a more accurate range of outcomes with respect to potential project impacts to caribou.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #60)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>It is Denison's and their terrestrial SME's opinion that the approach used to characterize caribou habitat alteration provided a sufficient basis for conducting the caribou effects assessment (draft EIS Section 9.3).The Project Area had a 500 m buffer applied to account for indirect effects/habitat alteration; this area is within the wildlife LSA (refer to Figure 9.3-9 for a map showing the spatial areas). The 500 m buffer for habitat alteration was selected in accordance with ECCC’s assessment of disturbed areas, which buffered (500 m) anthropogenic disturbances to evaluate the habitat. The alteration of available habitat is quantified in this EIS by applying a buffer of 500 m around the Project Area in which Project effects in the form of sensory disturbance are likely to affect available the habitat and make it functionally unavailable for use. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan. The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat. The Plan is an evergreen document. It will be consistent with</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>Updated BNDN Position: <b>Not Addressed.</b></p> <p>The Environmental Assessment (EA) process is meant to safeguard BNDN’s lands, waters and wildlife, yet it is fundamentally flawed in its ability to prevent significant adverse impacts on caribou. Despite decades of policy and regulatory measures, caribou populations continue to decline, highlighting the failure of existing approaches to provide effective protection. As Dene people, we have long understood that the EA process is insufficient to ensure the survival of caribou. In recent years, emerging western scientific research has confirmed this understanding, reinforcing the need for stronger protections (Collard et al., 2020; Cameron &amp; Kennedy, 2023). The EA process often downplays the risks to caribou populations and underestimates the true extent of impacts (Collard et al., 2020; Cameron &amp; Kennedy, 2023). The reliance on a 500-meter buffer as the basis for assessing habitat alteration is a clear example of this severe underestimation. Denison’s reliance on a 500-meter buffer to assess caribou habitat alteration is insufficient and does not align with the broader scientific consensus on caribou avoidance of industrial disturbances. While ECCC (2020) recommends a 500-meter buffer to assess habitat disturbance, this buffer represents the low end of potential impacts and is insufficient to fully account for caribou avoidance behavior. Research has shown that caribou avoidance behavior extends significantly beyond this distance, with many studies supporting avoidance distances of up to 5 kilometers or greater (Dyer et al. 2001; Courtois et al. 2008; Vistnes and Nellemann 2008; Leblond et al. 2011, 2013; Johnson et al. 2015). Furthermore, Other jurisdictions, such as Ontario, apply much larger buffer distances, with recommendations extending to 10 kilometers to better reflect the true impact of sensory disturbances. This stark contrast highlights the severe underestimation in the EIS, where a 500-meter buffer fails to account for the full extent of caribou avoidance behavior. BNDN requests that the percent alteration of habitats be presented using a 500 m (low end) up to a 5,000 m (high end) buffer. BNDN believes this analysis will provide a more accurate range of outcomes with</p>		<p>the management goals of SK ENV for the SK-1 caribou conservation unit (once available) and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and SK ENV. Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes.</p>				

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		respect to potential project impacts on caribou. Collard, R., Dempsey, J., & Holmberg, M. (2020). Extirpation despite regulation? Environmental assessment and caribou. Conservation Science and Practice, 2(9). <a href="https://doi.org/10.1111/csp2.166">https://doi.org/10.1111/csp2.166</a> Cameron, E., & Kennedy, S. (2023). Can environmental assessment protect caribou? Analysis of EA in Nunavut, Canada, 1999-2019. Conservation and Society, 21(2), 121-132. <a href="https://doi.org/10.4103/cs.cs_54_22">https://doi.org/10.4103/cs.cs_54_22</a>						
Birch Narrows Dene Nation	Health and socio-economic conditions	Concern about adequate consideration of socioeconomic effects related to the Project that may affect BNDN (e.g., work camp, temporary workers, increased traffic).	ROC 479	<p>Both the construction and operation camps will operate on a fly-in/out basis, meaning the opportunities for interactions between the workforce and Indigenous communities are limited as workers will be transported by air directly to the site. Section 12.2.4.2.1 provides the actions to minimize the extent the Project contributes to in- and out- migration in the LSA, including:</p> <ul style="list-style-type: none"> <li>• Denison will initially prioritize the COI in terms of employment opportunities and will work with the leadership of these communities to assist in determining hiring practices during all phases of the Project. Priority for hiring will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</li> <li>• Employees will not be permitted to commute to the site by any means other than the fly-in/fly-out worker rotation systems (i.e., they cannot drive to the site).</li> <li>• Pick-up and drop-off points are being planned at two locally central points in communities within the LSA, at one additional site in Saskatchewan (i.e., Saskatoon), and potentially at other locations.</li> <li>• Housing for workers will be provided at the camps with free accommodations and meals.</li> </ul> <p>Although difficult to predict, communities in the LSA are not expected to experience any substantial population growth or change in demographics as a result of the Project, particularly with mitigation measures identified. Although the potential exists for some individuals to return to the COI, it is anticipated that this would be difficult to discern from existing in-/out-migration rates. As population and demographics are not expected to experience any change as a result of the Project, this pathway will not be carried forward to the residual effects assessment.</p>	<p>Mitigations related to project employment are provided in Section 13.2.5 and to work camps and temporary workers are provided in Section 12.2.5 and 12.3.5 include:</p> <ul style="list-style-type: none"> <li>• Denison will initially prioritize the COI in terms of employment opportunities and will work with the leadership of these communities to assist in determining hiring practices during all phases of the Project. Priority for hiring will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</li> <li>• Employees will not be permitted to commute to the site by any means other than the fly-in/fly-out worker rotation systems (i.e., they cannot drive to the site).</li> <li>• Pick-up and drop-off points are being planned at two locally central points in communities within the LSA, at one additional site in Saskatchewan (i.e., Saskatoon), and potentially at other locations.</li> <li>• Housing for workers will be provided at the camps with free accommodations and meals.</li> </ul>	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to come to resolution.	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Health and socio-economic conditions	Make sure that training and employment opportunities for BNDN members are available and accessible.	ROC 479	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for	Based on Denison's understanding of the concern or comment, Denison has provided	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison

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				established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.	employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.	background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to come to resolution.		remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Health and socio-economic conditions	Make sure that Denison provides business and procurement opportunities to BNDN members and businesses.	ROC 479	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN's interests. Denison remains committed to engaging with the BNDN to	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.

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						come to resolution.		
Birch Narrows Dene Nation	Health and socio-economic conditions	<p><b>BNDN Comment February 28, 2023</b></p> <p>BNDN is not included as a Local Study Area (LSA) Community despite being closer to the Project than other LSA Communities. The Project is situated on BNDN’s ancestral lands. BNDN members currently and historically use the LSA for harvesting (commercial and personal) and ceremonial purposes. Without the LSA Community designation, BNDN members are less likely to be employed or trained through the Project. BNDN members are not entitled to priority training and employment provisions from Denison on the Project. Further, BNDN businesses and partnerships are not entitled to priority procurement provisions from Denison on the Project.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>· BNDN must be identified as a LSA Community. BNDN members and businesses must be eligible for LSA priority status for employment, training, and contracting opportunities. The EIS should be revised accordingly.</li><li>· A formal agreement between BNDN and Denison is required to outline socioeconomic offsetting measures and benefits should the Project move forward. This must include ways for BNDN businesses and member owned businesses to participate in the Project.</li></ul> <p>Denison references a Human Resource Development Plan (HRDP) as a mitigation measure to ensure local and regional community members are hired in priority. However, Denison does not provide sufficient details to allow Birch to assess the adequacy of the HRDP.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>· BNDN requests the ability to review and comment on Denison’s Human Resource Development Plan to provide input and recommendations to encourage community participation and employment in the Project.</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #13)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Economic benefits surrounding Project employment (including income and training) are likely to be targeted toward the communities identified within the spatial boundaries. Economic impacts extending beyond the LSA are likely to be diffused and undetectable within the broader economy. The spatial boundaries were selected based on the consideration of communities where Project recruitment is likely to be prioritized, consideration of previous EAs conducted in the region, and consideration of information shared through key persons in the interview program. The LSA for the assessment of the economy includes the following communities: ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village. Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</p>	Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project (Section 13).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



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		<p>Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN is still not being considered a Local Study Area (LSA) community despite being closer to the Project than other LSA communities. Without the LSA Community designation, BNDN members are less likely to be employed or trained through the Project. BNDN members are not entitled to priority training and employment provisions from Denison on the Project. Further, BNDN businesses and partnerships are not entitled to priority procurement provisions from Denison on the Project. This is unacceptable. Denison and BNDN must work together to develop an Accommodation Agreement (e.g. Impact Benefit Agreement or Mutual Benefit Agreement) in order to accommodate for the impacts of the Project on BNDNs rights, interests, and the environment.</p>						
Birch Narrows Dene Nation	Health and socio-economic conditions	<p><b>BNDN Comment February 28, 2023</b> There is no BNDN specific Indigenous Knowledge or socioeconomic data presented in the EIS. Request/recommendation: - Denison must conduct Indigenous Knowledge and Community well-being Study (or similar) to gather BNDN specific information. These studies will allow for a more fulsome assessment of the Project on BNDN rights and interests. Additionally, BNDN specific data will enhance Denison’s baseline data and help to inform mitigation and monitoring measures.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>While the proponent has requested Indigenous Knowledge from BNDN, they have not made any resources available for BNDN to collect it, nor has the company engaged in any efforts to sign any agreements that provide assurances around confidentiality. BNDN lacks capacity and requires such resources and assurances to be able to provide Indigenous Knowledge; further, it is standard procedure for proponents to provide such financial</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #14)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date. Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Economic benefits surrounding Project employment (including income and training) are likely to be targeted toward the communities identified within the spatial boundaries. Economic impacts extending beyond the LSA are likely to be diffused and undetectable within the broader economy. The spatial boundaries were selected based on the consideration of communities where Project recruitment is likely to be prioritized, consideration of previous EAs conducted in the region, and consideration of information shared through key persons in the interview program. The LSA for the assessment of the economy includes the following communities: ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village. The spatial boundaries</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



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		capacity. The project is located in a critically important area for BNDN; Cree Lake and surrounding areas fosters important caribou habitat that BNDN members rely on; impacts to these animals and areas will undoubtedly impact BNDN’s well-being. However, this and related issues have not been considered in the project. Further, BNDN carries out economic activities in within the study area; however, the economic impacts of the project on BNDN has not been assessed. I) BNDN requires capacity funding from the proponent to conduct a community-led and project-specific Indigenous Knowledge study so BNDN can evaluate the impacts the project will have on BNDN and so the results of the study may inform the project and its evaluation. II) BNDN requires the EIS to be updated based on the results of BNDN’s Indigenous Knowledge study – including the sections on economy and community well-being VCs. BNDN must be engaged on how its results are used to update the EIS.		selected for Community Well-being were chosen because they permit baseline characterization in sufficient detail to enable potential interactions between the Project and the well-being of the community. These boundaries were developed in consideration of where interactions are likely to occur. The spatial boundaries were derived based on the consideration of communities where Project recruitment is likely to be prioritized, consideration of previous EAs conducted in the region, and consideration of information shared through key persons in the interview program. The LSA for the Community Well-being VC includes ERFN (including Indian Reserves Wapachewunak 192D and La Plonge 192) and Patuanak, Northern Hamlet; Pinehouse Lake, Northern Village; and Beauval, Northern Village.				
Birch Narrows Dene Nation	Health and socio-economic conditions	<b>BNDN Comment February 28, 2023</b> While EIS does consider the effects of population changes related to the Project on social adaptability, demand for services and housing, it does not address the full range of potential impacts associated with a transient workforce. Significant research has been conducted to demonstrate the negative impacts of remote workers and work camps on Indigenous women and girls. This must be considered in the EIS. The EIS must include an assessment of all potential effects of a transient workforce and changes to population dynamics, including those disproportionately experienced by Indigenous women and girls, and other segments of the population. This must incorporate findings of research like the 2017 study completed by Lake Babine Nation and Nak’azdli Whut’en (Indigenous Communities and Industrial Camps), and/or related research in the context of the LSA.  <b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.  <b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN	BNDN Public Comment February 28, 2023 (BNDN Public Comment #15)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  Both the construction and operation camps will operate on a fly-in/out basis, meaning the opportunities for interactions between the workforce and Indigenous communities are limited as workers will be transported by air directly to the site. Section 12.2.4.2.1 provides the actions to minimize the extent the Project contributes to in- and out- migration in the LSA, including: • Denison will initially prioritize the COI in terms of employment opportunities and will work with the leadership of these communities to assist in determining hiring practices during all phases of the Project. Priority for hiring will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA. • Employees will not be permitted to commute to the site by any means other than the fly-in/fly-out worker rotation systems (i.e., they cannot drive to the site). • Pick-up and drop-off points are being planned at two locally central points in communities within the LSA, at one additional site in Saskatchewan (i.e., Saskatoon), and potentially at other locations. • Housing for workers will be provided at the camps with free accommodations and meals. Although difficult to predict, communities in the LSA are not expected to experience any substantial population growth or change in demographics as a result of the Project, particularly with mitigation measures identified. Although the potential exists for some individuals to return to the COI, it is anticipated that this would be difficult to discern from existing in-/out-migration rates. As population and demographics are not expected to experience any	Section 12.2.4.2.1 provides the actions to minimize the extent the Project contributes to in- and out- migration in the LSA.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>Fly-in/fly-out (FIFO) work camps for mining operations in Canada do not eliminate interactions between the workforce and Indigenous communities and the social problems that arise as a result. The FIFO approach may create new issues. The discussion and mitigation measures the proponent proposes does not include a fulsome analysis of all the potential effects of transient workforce and population dynamics, and understates the potential impacts on community well-being. The proponent’s response furthermore does not discuss nor address BNDN’s concern regarding the impacts of the project on Indigenous women and girls, and other segments of the population.</p> <p>I) BNDN requires the proponent to include a fulsome assessment of the potential impacts of transient workforce and the FIFO approach on Indigenous communities, including on Indigenous women and girls and other segments of the population. The EIS must incorporate the findings of research like the 2017 study completed by Lake Babine Nation and Nak’azdli Whut’en (Indigenous Communities and Industrial Camps), and/or related research in the context of the LSA.</p>		<p>change as a result of the Project, this pathway will not be carried forward to the residual effects assessment.</p>				
Birch Narrows Dene Nation	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	<p><b>BNDN Comment February 28, 2023</b></p> <p>BNDN notes that the environmental risk assessment (draft EIS Appendix 10a) makes no mention of potential impacts the project may have on mercury biogeochemical cycling and the consequent risks to the environment and human health. This is unsurprising given the lack of baseline sampling of mercury in sediments and soils, especially wetland soils.</p> <p>The lack of baseline mercury sampling is a significant oversight given the significant impact that mining operations can have on mercury biogeochemistry, including mercury methylation, and mobility of mercury species within the environment.</p> <p>BNDN is very concerned with the complete lack of assessment of this important consideration for the project and the consequent inability for our members to adequately understand the potential risks to our Treaty and Aboriginal rights from these risks. Note that the absence of baseline information gathered</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #43)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Although baseline concentrations of total mercury in sediment have not been collected during baseline sampling to date, Denison will collect background information pertaining to sediment total and methyl mercury from LSA lakes and rivers prior to site development. As indicated in EIS Section 8.4.6.1, Residual Effects Characterization, mercury is not associated with the local geology and is not expected to be released in the effluent at measurable levels and was therefore not identified as a COPC. Denison notes that there is potential for increased methylmercury production in the receiving environment under a certain combination of factors to which the Project may contribute; however, prediction of methylmercury production is not practical. Denison commits to monitoring mercury and methylmercury in the aquatic environment over the life of the Project to determine the potential changes in mercury concentrations in fish tissue over time. As the Project advances and operational monitoring is underway, Denison will assess health risks from fish consumption by comparing fish tissue data collected during operation from the monitoring program against Health Canada’s mercury guideline of 0.5 ug/g wet weight.</p>	Denison commits to monitoring mercury and methylmercury in the aquatic environment over the life of the Project to determine the potential changes in mercury concentrations in fish tissue over time (Section 8).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>can be reasonably considered an impact on our Treaty and Aboriginal rights as our members will avoid exercising our rights if BNDN lack the information to have confidence that it is safe to do so.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Partially addressed.</b></p> <p>BNDN requires Denison to commit to ongoing involvement of our Nation in mercury monitoring on site. The engagement process should be formalized in a BNDN-Denison process agreement and eventual Mutual Benefits Agreement.</p>		<p>This is a human health risk-based maximum permissible concentration. Mercury data presented throughout the draft EIS represents total mercury. Denison agrees to included methylmercury as part of the constituents monitored in fish throughout all project phases.</p>				
Birch Narrows Dene Nation	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	<p><b>BNDN Comment February 28, 2023</b> One of the mitigation measures implemented to protect ungulates, furbearers, and Woodland Caribou includes de-icing the Project roads for winter traction, which will result in fewer wildlife collisions. Salt used for de-icing is likely to attract ungulates, including moose, to roadways to satisfy their mineral requirements (Rea et al 2021). Request/recommendation: -BNDN requests that the Proponent revise this mitigation measure to explicitly state that salt will not be used for de-icing Project roads to avoid attracting ungulates to the Project Area. This mitigation measure can be found in section 9.3.5.2.7 Road and Traffic Management.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #59)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison has committed to using alternative measures on Project roads for de-icing and winter traction (e.g., sand, gravel) or dust suppression (e.g., water) whenever practicable (Section 12.0).</p>	Denison has committed to using alternative measures on Project roads for de-icing and winter traction (e.g., sand, gravel) or dust suppression (e.g., water) whenever practicable.	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.
Birch Narrows Dene Nation	Health and socio-economic conditions;	<p><b>BNDN Comment February 28, 2023</b> Denison’s air dispersion model does not include any receptor locations related to BNDN traditional land and resources use (TLRU) and Indigenous Knowledge</p>	BNDN Public Comment February 28, 2023 (BNDN	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Scoping of the air quality assessment followed a conservative approach and described where modelled concentrations returned to background levels.</p>	N/A	Ongoing - Denison is committed to working toward	As per letter received May 26, 2025	Discussions continue with BNDN about working toward

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	Current use of lands and resources for traditional purposes; Other	<p>(IK) sites. BNDN members use the lands and waters in the Project area for TLRU and ceremonial purposes. Request/recommendation:</p> <ul style="list-style-type: none"><li>- BNDN TLRU and IK sites should be considered in Denison’s air quality assessment. The geographic locations for TLRU and IK should be inputted into the air dispersion model as special receptors. This will provide site specific data for BNDN land users who use the LSA so they can effectively assess the Project’s impact on land use and rights.</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>The response does not adequately address BNDN’s concern that no BNDN Indigenous Knowledge or land use locations were included in the air dispersion model as special receptors.</p>	Public Comment #69)	The air quality assessment included human receptors in the Project Area and Local Study Area (refer to draft EIS, Figure 6.1-3). These receptor locations are consistent with what was presented in the ERA (Section 10.1 and Appendix 10-A).		reaching a resolution on these issues.		a resolution on these issues.
Birch Narrows Dene Nation	Health and socio-economic conditions; Other	<p><b>BNDN Comment February 28, 2023</b> Denison states in the EIS “the Cameco McArthur River Operation and Key Lake sites are currently in Care and Maintenance mode; therefore, there is currently no truck traffic between the sites on Highway 914. When these sites are to become operational again, there is potential for a cumulative effect at sensitive locations near the highway.” On November 28th, 2022, operations resumed at Cameco’s McArthur River Uranium Mine and Key Lake Mill. Denison did not model Cameco related air emissions in their air dispersion model. The EIS model does not account for any of Cameco’s air emissions from the mill, mine, and associated truck traffic between sites. Without this data included in the model, the EIS does not adequately account for the cumulative effects of Cameco’s McArthur River Mine and Key Lake Mill on the atmospheric environment. Request/recommendation:</p> <ul style="list-style-type: none"><li>- Denison must redo air dispersion modeling to account for the Cameco McArthur River Uranium Mine and Key Lake Mill which have resumed operations since the EIS was released. Without this data included in the model the EIS does not</li></ul>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #70)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Please refer to Section 6.1.3.2 and 6.1.7. The regional SK MOE data presented in Table 6.1-12 were conservatively used to represent background concentrations of TSP, PM10, PM2.5, CO, SO2, and NO2 for the Wheeler River Project air quality assessment. While traffic associated with Cameco Operations was not modelled, conservative regional background concentrations from the Saskatchewan Air Quality Modelling Guideline (SK MOE 2012a) and the La Loche monitoring station were used for particulate matter, NO2, SO2, and CO (see Section 6.1.3.2.5 and Appendix 6-A). The La Loche monitoring station is located near anthropogenic sources, while the Project is in a remote area removed from anthropogenic sources. Accordingly, emissions to air from traffic associated with Cameco’s operations are captured by the regional background concentrations used in the air dispersion model and are considered in the assessment of Project-related effects discussed in Section 6.1.4. Model predictions of COPC concentrations and depositions were added to background levels and compared to the available standards summarized in Table 6.1-5 at receptors located outside the property boundary. To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial ambient air quality standards, an adaptive air quality management program will be implemented. The air quality management program will contain various plans which will be finalized during permitting</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.

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		<p>accurately capture baseline conditions or cumulative effects on the atmospheric environment. Fugitive dust and uranium emissions (and potentially other contaminants) have increased potential for exceedances with the resumption of Cameco’s operations, as exceedances are already predicted with the Wheeler River Project alone.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>		<p>and licensing. The plans within the air quality management program will incorporate monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested.</p>				
Birch Narrows Dene Nation	Health and socio-economic conditions; Physical and cultural heritage; Current use of lands and resources for traditional purposes; Other	<p><b>BNDN Comment February 28, 2023</b> BNDN notes that no specific management or monitoring plan has been included in the EIS documentation related to the verification of residual socio-economic impacts, both positive and negative, for the local economy. Denison documents their conceptual level environmental protection program, including several proposed management and monitoring plans which they will develop to manage operations on site. The environmental protection measures which Denison undertakes at the Project site are highly consequential to BNDN, and BNDN requires the opportunity to provide our knowledge and input into environmental protection measures developed for activities within our Ancestral Lands. There is no discussion on how Indigenous communities, such as BNDN, will be included in environmental management, emergency management, monitoring, and remediation. This includes issues related to ongoing permitting or specific remediation such as in the case of an accident or malfunction. Unfortunately, due to the nature of planning and licensing for complex projects such as the Wheeler River mine, there are many documents, plans, licenses and approvals which may not be available for review during the environmental assessment process or which will take place subsequent to completion of the assessment. For example, Denison will be preparing important documentation governing environmental management of the Project following the Environmental Assessment. While these are not</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #12, #16, #17, #36, #51, #53, #68, #79)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).</p>	<p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>



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		<p>currently available, there is a need to engage with BNDN to obtain input on these documents as planning progresses. Denison’s proposed terrestrial ecology mitigations described are generalized and conceptual in the EIS. With the level of detail provided in the EIS, it is not possible for BNDN to comment on the adequacy or effectiveness of the proposed mitigation measures or whether proposed mitigations will meaningfully diminish Project impacts on BNDN rights and interests. BNDN notes that Section 5.3.1 does not confirm that impacted Indigenous Nations will have the opportunity to participate in future archaeological fieldwork. While BNDN understands that many impacted Nations will have arrangements directly with Denison to facilitate member participation, this should additionally be made available to all impacted Indigenous Nations as part of best practices at the Project.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>- In addition to any provisions developed in a Project Agreement between BNDN and Denison for the Wheeler River Project, Denison should include a clause that confirms that all impacted Indigenous communities will be invited to have monitors participate in any additional fieldwork and that Denison will provide capacity funding for Nations that wish to participate.</li><li>- Denison must develop a Socio-Economic Monitoring Plan for the life of the Project to verify the effects assessment included in the EIS and to be included in the Project’s approach to adaptive management. This Plan would include an approach, co- developed with Indigenous groups in the LSA (including BNDN), to monitoring the realization of the benefits and impacts of the Project (e.g., employment and procurement targets, training and capacity building, community investments, etc.) as mitigation and enhancement measures are implemented. Monitoring and subsequent regular evaluation would allow for the real-time adjustment of targets and/or an approach to adjusting enhancement measures or identifying offsetting benefits where targets are not met.</li><li>- The Crown must include the development of a Socio-Economic Monitoring Plan as a condition of approval for the Project.</li><li>- BNDN requests that Denison commit to involving</li></ul>						



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		<p>BNDN in the development, review and approval of all environmental monitoring plans developed for the Project. Details of BNDN involvement in the development of environmental monitoring plans should be undertaken within an Environmental Committee, with specific terms defined within a BNDN-Denison Project Agreement for the Wheeler River Project</p> <ul style="list-style-type: none"><li>- BNDN requests that the CNSC impose a condition of approval on the project which states the requirement for Denison to consult with BNDN on all environmental management and monitoring plans for the project.</li><li>- To support BNDN’s ongoing participation in monitoring and oversight of the Project, BNDN request the establishment of an Environmental Committee or similar oversight mechanism. The purpose of the committee will be to review monitoring data and monitoring reports produced during the life-of-mine to ensure that the environmental protection is sufficient for all VCs. The committee can also participate in permitting throughout the life-of-mine for all relevant applications (e.g. Fisheries Act Authorizations, water permits, Closure Plan updates etc.) and provide input to management plans (e.g. EPPs, Surface Water Management Plan, Environmental Monitoring Plans, etc.). The specific details of such a committee can be developed through consultation with BNDN and must be formalized through a BNDN-Denison project agreement.</li><li>- BNDN requests that Denison consult with our staff members and advisors on important environmental documentation/plans/licenses that are not available as part of the EA process. Engagement with BNDN on these plans should occur through an Environmental Committee or similar oversight mechanism. The specific details of such a committee can be developed through consultation with BNDN and must be formalized through a BNDN- Denison project agreement for the Wheeler River Project.</li><li>- BNDN holds invaluable indigenous knowledge related to terrestrial ecology topics including traditional and medicinal plants, ungulates, furbearers, game birds etc. within the RSA. BNDN must be meaningfully involved in the development and implementation of the various management and</li></ul>						

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		<p>monitoring plans mentioned throughout Chapter 9 of the EIS to ensure that proposed impacts are sufficiently reduced. These plans include but are not limited to the wildlife monitoring plan, avian monitoring, and Woodland Caribou Management Plan. The role that BNDN will have in developing management and monitoring plans should be defined within a project agreement between BNDN and Denison.</p> <p>- BNDN requests the implementation of robust and long-term environmental monitoring to verify protection of the environment, including community-led monitoring during Construction and Operations of the Project. Denison must develop specific roles and responsibilities to BNDN members in relation to air quality monitoring and site wide environmental monitoring. This should include, at a minimum, one environmental monitor position for BNDN. This would provide increased transparency and confidence to Denison’s environmental management practices and performance.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not addressed.</b></p> <p>The project is located within BNDN’s treaty and ancestral lands where members have deep ancestral ties and continue to exercise rights to this day. Most archaeological material in Canada is Indigenous in origin; there is a significant chance that any archaeological material found on site derives from BNDN ancestors. BNDN has inherent rights to its cultural heritage, as affirmed by UNDRIP. The proponent must engage with BNDN to discuss opportunities for BNDN to participate in archaeological work moving forward.</p>						
Birch Narrows Dene Nation	Other	Interest to make sure BNDN is meaningfully consulted with and accommodated by the Crown and Denison.	ROC 479	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN, for example in respect to the land use activities to occurring in and around the Project, in	N/A	Based on Denison’s understanding of the concern or comment, Denison has	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project.

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				order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date.		provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN’s interests. Denison remains committed to engaging with the BNDN to come to resolution.		Denison remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Other	Interest in understanding cumulative effects associated with the construction of the processing facility and the potential to accept material from other deposits or companies.	ROC 479	Refer to Section 2 for information on Project development. The cumulative effects assessment considers whether residual adverse effects of the Project on a given VC will overlap spatially and/or temporally with the same residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. Refer to Section 16 on the summaries for project cumulative and residual effects.	N/A	Based on Denison’s understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN’s interests. Denison remains committed to engaging with	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
						the BNDN to come to resolution.		
Birch Narrows Dene Nation	Other	Effects to surface water quality and quantity from effluent release and water taking, including groundwater.	ROC 479	<p>Potential effects from the Project on water quality were assessed in Section 8.2 of the EIS and the assessment directly evaluated discharge of effluent from the site using predictive modeling. Water treatment will occur; testing will occur prior to release; and no release will occur if water quality des not meet objectives. The predictive modeling showed that constituent concentrations including radionuclides would be below water quality objectives for the protection of aquatic life (i.e., no effects would be expected) at the outlet of White Lake well upstream of the outflow of the Icelfander River to Russel Lake.</p> <p>The specific activity of water taking from White Lake to support the mining operation was assessed in Section 8.1.4.2.2 of the EIS. Based on a conservative (i.e., high) estimate of water taking it was estimated that the taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by about 1 cm. These small incremental changes would be beyond the ability of monitoring techniques to practically measure and are much less than the natural variability seen. For these reasons the EIS concluded that these minor incremental changes did not represent a significant adverse effect.</p> <p>Denison recognizes that geology and groundwater are of particular importance within the context of the EIS given the proposed mining method and believes that the assessment presented in the EIS and its supporting documentation is comprehensive. Denison is committed to developing / implementing appropriate mitigations to avoid or limit identified adverse effects resulting from the Project, whether direct or indirect. Proposed mitigation measures specific to geology and groundwater and presented in the draft EIS, Section 7.5, Mitigation Measures, and Table 7.5-1 therein provides a summary of mitigation measures based on Project phases for the geology and groundwater VC.</p>	N/A	Based on Denison’s understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the BNDN to reflect the BNDN’s interests. Denison remains committed to engaging with the BNDN to come to resolution.	As per letter received January 18, 2024	Denison will continue to ensure BNDN is informed about the progression of the Project. Denison remains committed to engaging with the BNDN to come to resolution.
Birch Narrows Dene Nation	Other	<b>BNDN Comment February 28, 2023</b> In several instances in the draft EIS Denison has noted that Indigenous Nations are concerned with the possibility of mercury contamination from mining operations. BNDN shares these concerns with other Indigenous Nations. Due to the very low concentrations of mercury present in the Phoenix deposit, Denison has not meaningfully studied the potential impacts the Project may have on altering mercury biogeochemistry in the downstream environment. BNDN notes that background mercury concentrations can be elevated in many unexpected and remote locations due to atmospheric deposition	BNDN Public Comment February 28, 2023 (BNDN Public Comment #18)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  Although baseline concentrations of total mercury in sediment were not collected during the baseline program, Denison will collect background information pertaining to sediment total and methyl mercury from LSA lakes and rivers prior to site development. As indicated in draft EIS Section 8.4.6.1, Residual Effects Characterization, mercury is not associated with the local geology and is not expected to be released in the effluent at measurable levels and was therefore not identified as a COPC. Denison notes that there is potential for increased methylmercury production in the receiving environment under a certain combination of factors to which the Project may contribute; however, prediction of methylmercury production is not practical. Denison commits to monitoring mercury and	Engagement on licensing requirements, such as the development of the environmental monitoring program and the associated monitoring regime will occur to support Project permitting and licensing efforts.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>(often due to coal plants) (Jackson, 1997). BNDN is very concerned that Denison has not analyzed for mercury as part of their baseline soil geochemistry assessments for the Project, especially in wetlands downstream of the Project. Mercury concentrations in wetland soils are sensitive to changes in water chemistry that can lead to increased mercury methylation. This is especially acute from increases in nutrients and sulphates which can active sulfate reducing microorganisms that methylate mercury (Liu, Li, &amp; Cai, 2012). Table 4 of Appendix 8e shows that the effluent discharged to Whitefish Lake will have mercury concentrations almost 5,700 times background concentrations. This dramatic increase in sulfate loading to Whitefish Lake may not exceed water quality objectives unto itself but may be sufficient to meaningfully change mercury biogeochemistry in downstream wetlands. BNDN is very concerned with the complete lack of assessment and analysis of baseline mercury concentrations and the potential changes to mercury cycling that could be induced by the Project.</p> <p>Request/recommendation:</p> <p>a) BNDN requests that Denison undertake baseline studies of mercury concentrations in soils, with a focus on baseline concentrations of mercury in organic wetland soils downstream of the project. Note that mercury sampling should sample total mercury and methylmercury in all analyses, as well as porewater total mercury and methylmercury. The study design and implementation should be undertaken collaboratively with BNDN.</p> <p>b) BNDN recommends that the CNSC requires Denison to undertake a baseline assessment of mercury in soils (with a focus on wetlands) prior to construction of the Project. This may be established as a condition of approval for the Project.</p> <p>c) Depending on the findings of the baseline mercury in soils and wetlands studies, the CNSC should include a condition of approval on the Project that requires Denison to monitor mercury biogeochemistry in the receiving environment over the life of mine.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p>		<p>methylmercury in the aquatic environment over the life of the Project to determine the potential changes in mercury concentrations in fish tissue over time. As the Project advances and operational monitoring is underway, Denison will assess health risks from fish consumption by comparing fish tissue data collected during operation from the monitoring program against Health Canada's mercury guideline of 0.5 ug/g wet weight. This is a human health risk-based maximum permissible concentration. Mercury data presented throughout the draft EIS represents total mercury. Denison agrees to include methylmercury as part of the constituents monitored in fish throughout all project phases. Engagement on licensing requirements, such as the development of the environmental monitoring program and the associated monitoring regime will occur to support Project permitting and licensing efforts.</p>				

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		<p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Partially Addressed</b> BNDN notes that Denison has committed to monitoring total and methyl mercury in lakes and rivers in the LSA prior to site development and over the life of the Project. However, as stated in the original comment, monitoring of wetlands is of high importance for BNDN. Wetlands are a well- known source of mercury accumulation, with conditions that favour the development of methylmercury (Zhang et al., 2023). Where developments cause changes to these wetlands, such as altered water levels, it can precipitate changes that cause increases in the discharge of mercury to downstream environments (Ullrich, Tanton, &amp; Abdrashitova, 2001). For this reason, omitting wetlands from mercury monitoring is a glaring gap that must be addressed. Ullrich, S. M., Tanton, T. W., &amp; Abdrashitova, S. A. (2001). Mercury in the aquatic environment: a review of factors affecting methylation. Critical reviews in environmental science and technology, 31(3), 241-293. Zhang, J., Li, C., Tang, W., Wu, M., Chen, M., He, H., ... &amp; Zhong, H. (2023). Mercury in wetlands over 60 years: research progress and emerging trends. Science of the Total Environment, 869, 161862.</p> <p><b>b. Not Addressed</b> Comments for regulators will be addressed through future engagement with the appropriate regulator.</p> <p><b>c. Not Addressed.</b> BNDN requires active involvement in the mercury monitoring program design and implementation. BNDN’s involvement must be formalized in a mutual benefits agreement between Denison and BNDN for the Wheeler River Project.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Figure 7.6-10 and 7.6-11 of the draft EIS show the results of Denison’s modelling of uranium mobility and adsorption from the ore body following the decommissioning of the mine. The figures show that the model indicates that all dissolved uranium will be</p>	BNDN Public Comment February 28, 2023 (BNDN Public	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. As the Indigenous Communities of Interest with reserves and</p>	Denison has committed to collaborating with English River First Nation (ERFN) and Kineepik Métis Local (KML) on details and updates to the decommissioning plan which includes mining area remediation plans and associated post-decommissioning modelling of groundwater from	Ongoing - Denison is committed to working toward reaching a	As per letter received May 26, 2025	Discussions continue with BNDN about working toward



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		<p>effectively removed from solution within a short distance of the orebody via adsorption to clays present in the bedrock. In Section 3.5.6.2.1 of Appendix 7c of the draft EIS Denison notes that there is very limited literature available on uranium fate and transport, especially in similar environments to the Wheeler River Project. Denison's uranium speciation model relies almost entirely on a single academic article studying the partitioning of uranium in the alteration halo surrounding the Cigar Lake uranium deposit. Of very important note is that this paper is focused on the pre-mining environment at Cigar Lake and does not examine how uranium partitioning may be dramatically altered by ISR mining. Health Canada published a document on uranium in drinking water in 2017 literature review of uranium mobility, complexation and chemistry in groundwater which documents the widely varying behaviour of uranium in groundwater depending on redox conditions, pH, pressure, and other ions available for complexation which may increase or decrease uranium mobility (Health Canada, 2017). Uranium will be present in extremely high concentrations (100 mg/l) in the restoration solution. Many other anions and cations which uranium is known to form complexes with will also be present in the solution at very high concentrations. The limited literature upon which Denison has developed their models to predict uranium mobility post-decommissioning is insufficient to confidently assert that the very concentrated restoration solution will behave as predicted. Uranium is a common groundwater contaminant around the world and is known to be stable in dissolved forms in groundwater in many locations. Furthermore, some studies have indicated that the effectiveness of adsorption as a mechanism for attenuation of uranium in solution is significantly overstated, especially in environments where there is competition from other ions, as there will be in the restoration solution (Gandhi, Sampath, &amp; Maliyekkal, 2022).</p> <p>BNDN is very concerned that Denison has portrayed their groundwater contamination model in Appendix 7c with an inappropriate level of confidence given the level of uncertainty reasonably inferred from the lack of foundational literature relevant to the circumstances at Wheeler River and the well-</p>	Comment #19)	<p>residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation (ERFN) and Kineepik Métis Local (KML) on details and updates to the decommissioning plan which includes mining area remediation plans and associated post-decommissioning modelling of groundwater from the remediated mining area, suited to each of their interests and needs. As part of these updates, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that updates to the decommissioning plan and groundwater modelling would also be relevant to other Indigenous nations who may have an interest in the Project. As such, Denison will not be developing a process agreement with the BNDN to address concerns raised about pertaining to long-term groundwater quality for the Wheeler River Project. This comment is also applicable to other comments where the same request was made by the BNDN. The balance of this response pertains to groundwater quality and the numerical groundwater model presented in draft EIS will focus on the technical content of the concerns raised. Denison's groundwater SME and author of the modelling report (Appendix 7C) acknowledges that the modelling report did not include a lengthy discussion of uranium speciation and mobility. However, the reactive transport modelling done using the PHREEC geochemical code was carefully informed by relevant literature and was certainly not restricted to consideration of one study (Cigar Lake). In Section 3.5.3 of Appendix 7C we reference important studies pertaining to uranium complexation in solution by carbonate species (Guillaumont et al. 2003; Gorman-Lewis et al., 2008; Grenthe et al., 2020) and ternary complexes of uranium with calcium and magnesium and carbonates in solution (Dong and Brooks, 2006). These complexation reactions were added into the Project-specific PHREEQC database developed as part of the work presented in Appendix 7C. The database was updated to include solution-phase complexes of uranium in Guillaumont, 2003, which is a comprehensive summary of known reaction constants for uranium with dissolved-phase ligands. Further, the consideration of sorption of uranium-carbonate complexes to quartz, goethite and illite is shown in Appendix E of Appendix 7C, and relies on information from multiple publications. The reactive transport modelling was done using piChem (FELOW + PHREEQC) because of the ability of that approach to carefully consider speciation of uranium, and the potential interactions of uranium with other species in solution. The comment to which the BNDN refer in Section 3.5.6.2.1 of Appendix 7C is: "[t]o the best of our knowledge, there is very little information published about the solid-phase speciation of uranium and other constituents associated with ore bodies and the overlying and underlying rocks in the Athabasca basin". This is not speaking specifically to the speciation of uranium in the solid phase. Experimental work that provide information on solid-phase speciation include sequential extraction schemes and spectroscopic studies, such as recent work by Bayle et al., 2023 (<a href="https://pubmed.ncbi.nlm.nih.gov/37417589/">https://pubmed.ncbi.nlm.nih.gov/37417589/</a>). Research on the solid-phase speciation of uranium is not addressed in Health Canada</p>	<p>the remediated mining area, suited to each of their interests and needs. As part of these updates, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that updates to the decommissioning plan and groundwater modelling would also be relevant to other Indigenous nations who may have an interest in the Project. As such, Denison will not be developing a process agreement with the BNDN to address concerns raised about pertaining to long-term groundwater quality for the Wheeler River Project.</p>	<p>resolution on these issues.</p>		<p>a resolution on these issues.</p>

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		<p>understood complexity of uranium fate and transport in groundwater.</p> <p>It is not impossible to imagine that surface water contamination could eventually occur, especially given the exceptionally high concentrations of uranium in the restoration solution. By consenting to the Wheeler River Project, BNDN is supporting a process that will be irreversible once it commences and may be very difficult to manage should the underlying modeling assumption prove to be inaccurate by a significant margin. As a Nation whose members put a very high emphasis on the protection of groundwater resources, BNDN requires substantially greater reassurance through dialogue with Denison and further studies to have confidence that the Project will not irreparably degrade the natural environment in our Ancestral Lands.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>- Denison must develop a process agreement with BNDN to work through our concerns related to long-term groundwater contamination from the Project. This process agreement would lay out the pathway to obtaining BNDN consent for the Project through providing our Nation with confidence that the groundwater and surface water near to the project will not be irreparably contaminated. The process agreement will include additional studies and consultation activities with BNDN that Denison must undertake. The satisfaction of all terms in the process agreement would be defined by the signing of a Project Agreement between Denison and BNDN.</li><li>- BNDN recommends that Denison commit to funding bench-scale studies to validate the outputs from their FEFLOW and PHREEQC modelling. The bench-scale studies should be undertaken by an independent academic.</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Not Addressed</b> – Denison mischaracterizes BNDN as not being part of “Indigenous Communities of</p>		<p>(2017). As indicated, we were not able to find research pertaining to sequential extractions of spectroscopic studies of uranium in the solid phase for relevant materials/conditions. It is for this reason that we presented results of solid-phase uranium speciation in the available study by Percival 1989. It is acknowledged that this study was for Cigar Lake. The relevance of the work for the Wheeler River Project is high.</p>				

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		<p>Interest with reserves and residential communities most proximal to the Project”. BNDN is located closer (232 km) to the Project than Kineepik Métis Local (235 km). Further, the Project is located on BNDN’s Treaty Lands (Treaty 10), whereas Kineepik Métis Local has no Treaty lands or Treaty rights. As such, BNDN must be treated as a Indigenous Community of Interest with reserves and residential communities most proximal to the Project, not as some secondary community. Denison’s position of BNDN requiring consultation and accommodation that is less meaningful than KML is unacceptable and wrong. Denison and BNDN must work together to develop an Accommodation Agreement (e.g. Impact Benefit Agreement or Mutual Benefit Agreement) in order to accommodate for the impacts of the Project on BNDNs rights, interests, and the environment. This will include provisions to monitor groundwater and surface water; and to keep consult with BNDN as an impacted First Nation.</p> <p><b>b. Not Addressed</b> – BNDN notes that Denison did not agree to bench scale testing as requested. BNDN further notes that the position Denison has taken around the appropriateness of water quality modelling has to be taken at Denison’s word. BNDN requires an opportunity to review the effluent quality models input and outputs, followed by a discussion between BNDN, Denison and the CNSC to have confidence that the modelling has been done in a manner that BNDN can trust that the findings are a reasonable forecast of what will occur when the mine operates. Future discussions on this matter should occur within the framework of a BNDN-Denison process agreement for the Project.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>In Section 7.6.2.1 of the draft EIS, Denison mentions that they anticipate the outward migration of lixiviant as is observed at other ISR operations globally, and has incorporated their assumed concentrations of metals and the extent of area affected by flare from the ISR operations. Section 4.6 of Appendix 7c states that the flare zone is expected to extend 11 to 13 m but have modelled with a “conservative 50 m flare zone.</p> <p>It is not clear how Denison derived their assessment that the flare zone would extend 11 to 13 m and that a 50 m flare zone is considered conservative for the</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #20)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Groundwater modelling and flow path analysis calibrated to field conditions have evaluated upward solution migration and demonstrated that the maximum height that injected fluids will migrate upwards from the ore zone during active mining is likely between 11 to 13 m (Section 2 of the draft EIS). For conservatism, a 50-m vertical zone above the deposit was assumed to be potentially disturbed by mining activities. Denison specified 50m flare threshold based on their commitment to maintain inward hydraulic gradients, and or adding extraction wells as necessary to limit the migration of the flare. With the engineered controls described above, flare is not anticipated above 11-13 m. However, the decision was</p>	<p>Please refer to the first part of Denison’s response to BNDN comment #19 in regard to BNDN’s suggestion of a process agreement.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues..</p>

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		<p>purposes of modelling. BNDN requires further information to have confidence that the design is as conservative as the Proponent has suggested. Request/recommendation:</p> <ul style="list-style-type: none"><li>- BNDN requests that Denison provide further information on how the size of the area above the deposit affected by flare was calculated and how they determined that 50% restoration solution was determined as the appropriate concentration to base water quality modelling.</li></ul> <p>This item would be best addressed and resolved with BNDN through the process agreement to address BNDN’s concerns related to long term groundwater contamination from the Project.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN notes that the Proponent has not provided any reason that the flare is reasonably estimated to migrate 11 – 13m upwards. This number appears to be arbitrarily selected from BNDN’s perspective. BNDN requests that the Proponent provide case studies from comparable sites (or other evidence) that justifies their estimated flare distance. Future discussions on this matter should occur within the framework of a BNDN-Denison process agreement for the Project.</p>		<p>made to assume 50% of the restored solution uniformly between 15 and 50 m above the mineralized zone because there will be a natural gradient from 100% restored solution to 0% restored solution (i.e., baseline conditions) over this distance. The uncertainty associated with this decision was addressed in the uncertainty analysis presented in Section 4.7 of Appendix 7C, where 100% restored solution was assumed to be present over the entire 50 m height above the ore zone. The results of the model under both scenarios was consistent: no water quality effects above groundwater screening criteria, apart from those that reflect natural conditions, in Whitefish Lake. Over the life of the Project, groundwater quantity and quality monitoring activities will be completed to assess the performance of various components of the Project associated with engineering mining designs and performance and infrastructure designs to protect groundwater. A detailed Groundwater Monitoring Plan (GWMP) will be prepared to support licensing. The GWMP will include an Excursion Contingency Plan, and measures for adaptive management. The GWMP will be informed by the understanding of existing groundwater conditions at the Project Area (Appendix 7-A), the reactive transport modelling of groundwater COPCs associated with the restored mining area (Appendix 7-C), and the commitments made within the Geology and Groundwater section of the EIS. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Section 3.2.2.1 of Appendix 7C of the draft EIS describes the natural redox conditions in the ore zone as naturally reducing. The operation of the wellfield will result in the groundwater in the ore zone becoming oxidizing. Post decommissioning, the groundwater in the ore zone can be reasonably anticipated to return to baseline (reducing) redox conditions.</p> <p>BNDN notes that as redox conditions becoming increasingly reducing post closure, adsorption kinetics of contaminants adsorbed to clays could shift so that contaminants desorb from clays and are remobilized into solution. It is not clear to BNDN that</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #21)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Solution-phase concentrations of metals and uranium are what influence the desorption of these elements from clays over time; but the BNDN is correct that there may be hysteresis, or a kinetic component to desorption to equilibrium conditions. Re-establishment of reducing redox conditions - primarily through scavenging of residual oxidant with pyrite - with progressive movement of natural groundwater through the mining area in the Decommissioning period is anticipated to result in concentrations of metals and uranium at baseline conditions because the same mineral phases as are present now are expected to control the solubility of those elements. Secondary minerals may influence concentrations for a small number of constituents. In all cases. concentrations of these elements will</p>	<p>Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>

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		<p>the evolution of redox geochemistry and its implication on adsorption kinetics has been adequately considered by Denison.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>- BNDN requests further information on how increasingly reducing groundwater conditions post decommissioning may impact adsorption kinetics of contaminants expected to adsorb to clays.</li></ul> <p>This item would be best addressed and resolved with BNDN through the process agreement to address BNDN's concerns related to long term groundwater contamination from the Project.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>Similar to comment 19b, BNDN requests the opportunity to review the modelling work completed by Denison prior to considering this comment satisfactorily addressed. This comment can be addressed simultaneously with comment 19b. This discussion should occur within the framework of a BNDN- Denison process agreement for the Project.</p>		<p>not exceed those assumed in the model. In the model as presented, desorption from clays was taken into account for protons that had sorbed to chlorite in the mining area as a sensitivity analysis. The desorption of protons did not have an adverse effect on the water quality in Whitefish Lake. See draft EIS Appendix 7-C Sections 3.5.6.4 and 4.7. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In Section 3.4 of Appendix 7C Denison reports that they have excluded colloids from their post-decommissioning geochemical modelling. Denison has also noted that colloids would serve to enhance mobility of contaminants and they could precipitate out of solution. BNDN is concerned that by excluding the precipitation of colloids with adsorbed contaminants as a pathway for contaminant transport, Denison has significantly underestimated the mobility of contaminants and the consequent risks to the receiving environment.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>- BNDN requests that Denison prepare an additional geochemical model that considers the roles that colloids could potentially contribute to contaminant transport. The findings of this additional model (along with the other models) should be reviewed with</li></ul>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #22)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The authors acknowledged in Appendix 7C the potential for transport of COPCs in association with colloids was possible, and used previous research in a highly relevant system (Cigar Lake) to make the professional judgement that this process would not significantly alter the results of the numerical model. Colloid transport is not included routinely in reactive transport modelling because of the difficulty in a) accurately measuring the colloidal fraction in groundwater under existing conditions as the basis for the numerous assumptions that would need to made to include them in numerical modelling and b) the challenges with applying modelling approaches that have been developed at the scale of regional models (e.g., Molnar et al., <a href="https://www.pure.ed.ac.uk/ws/portalfiles/portal/109261315/109261203._Molnar._PFV.pdf">https://www.pure.ed.ac.uk/ws/portalfiles/portal/109261315/109261203._Molnar._PFV.pdf</a>). Refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS,</p>	<p>Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>



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		<p>BNDN. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN’s concerns related to long term groundwater contamination from the Project.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed</b></p> <p>BNDN sees the lack of assessment of the risks from colloids as a significant gap in the modelling for the Project. The fact that it is difficult to model the impacts of colloids does not diminish the need to assess their potential impacts when they are a known risk to the receiving environment. It is essential that Denison work with our Nation within the context of a process agreement to develop mutually agreeable mitigation measures to monitor this risk to the receiving environment.</p>		<p>which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In Section 4.0 of Appendix 7c of the draft EIS, Denison reports that the composition of restoration solution 1 and restoration solution 2 were derived from metallurgical testing. While this is likely the best, BNDN notes that the initial solution used in the geochemical modelling is enormously consequential in the accuracy of the modelling and require further confirmation and confidence that the restoration solutions are accurate to within a reasonable margin of error for the geochemical modelling. Request/recommendation: BNDN requests that Denison provide further information on how the chemistry in restoration solution 1 and restoration solution 2 were derived and any evidence they can provide that gives them confidence that these solutions are an accurate reflection of what will be observed in the wellfield. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN’s concerns related to long term groundwater contamination from the Project.</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #23)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Further information on how the chemistry in restoration solutions #1 and #2 were derived and evidence providing confidence that the reflect conditions that are expected in the mining area with remediation of the mining area is provided in the Denison Feasibility Report (2023) and a summary is attached as part of Denison's response to Federal Indigenous Review Team (FIRT) information requirement #67. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	<p>Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>



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		<p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN requires discussion with Denison and their SMEs to better understand their findings, especially the replicability and clarification on the suitability of the methodology chosen. This discussion should occur within the framework of a BNDN- Denison process agreement for the Project.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> BNDN notes that Denison has not provided any discussion on the extent to which the lixiviant and the solution used to flush the wellfield at the end of operations will interact with the underlying paleo weathered bedrock. BNDN notes that is it possible that there are mineral phases within the paleo weathered bedrock that are also readily soluble when exposed to the lixiviant. While BNDN recognizes that the paleo weathered bedrock has a low permeability, it is unclear to BNDN as to whether the lixiviant will contribute to mobilization of contaminants from the paleo weathered bedrock that requires consideration in the post- decommissioning groundwater model. Request/recommendation: BNDN requests that Denison provide any available information on how the bedrock may be altered (through dissolution of soluble mineral phases) by the lixiviant and the flushing of the wellfield during decommissioning, and whether this has been factored into their post-decommissioning groundwater model. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN’s concerns related to long term groundwater contamination from the Project.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Provisionally Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #24)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>In the modelling presented in Appendix 7-C, the mining area is assumed to span the entirety of the depth of the paleoweathered zone within the area of the freeze wall, as described in Section 4.6. Thus, in the Decommissioning period, the water quality in that entire portion of the paleoweathered zone was assumed to be equivalent to that of the "restored solution". This reflects, as the BNDN notes, the dissolution of soluble minerals associated with the paleoweathered zone due to interaction with the mining solutions. This assumption is conservative because the whole of the paleoweathered zone does not have the uranium mineralization of the ore zone, nor the concentrations of other COPC-containing mineral phases. Some alteration of the clays is expected, as is some bleaching (loss of iron-rich minerals); however, there is uncertainty with respect to the specific changes in the nature of the paleoweathered zone that have continued to be explored by Denison through experimental/metallurgical work. The decision was made in the numeric modelling to treat the portion of the paleoweathered zone within the freeze as geochemically unreactive - meaning that no sorption to clays or desorption from clays (with the exception of chlorite in the "pH tail" scenario (Section 3.5.6.4) was assumed for this zone. Thus, sorption of COPCs to clays in the paleoweathered zone within the numeric model occurred only outside of the freeze wall footprint, where the minerals will not have been exposed to mining solutions and will not have been altered. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		BNDN understands the modelling assumptions and would accept them assuming that the other unaddressed comments regarding modeling assumptions are addressed. Note that this does not address the need for a process agreement for the entirety of the Wheeler River Project with our Nation.						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In section 5.2.2 of Appendix 7c of the draft EIS Denison reports the assumptions built into their post-decommissioning groundwater modelling. BNDN notes that Denison has assumed that adsorption reaction sites are assumed to be available uniformly throughout the subsurface parameter zones. The presence of sufficient adsorption sites is a primary variable which determines the outcomes of the groundwater modelling, as adsorption of ions out of solution is the primary means by which contaminant transport is attenuated in Denison’s modelling. BNDN is concerned that the presence of a variable that is so consequential to the findings of the model is based primarily on assumptions with limited information to base the assumptions upon. Request/recommendation: BNDN requests that Denison provide justification for the assumption that adsorption sites will be uniformly available throughout the sub-surface parameter zones. BNDN requests that Denison provide information on how they estimated the extent to which adsorption sites are already saturated prior to mining. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN’s concerns related to long term groundwater contamination from the Project.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN notes that should the assumptions turn out to be incorrect (for example, contaminants in solution are not effectively removed from solution via</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #25)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>We note the uncertainty assessment in the draft EIS tests conditions where less sorption sites are available (1/10th of the characterized amount). Further, refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances. Denison is committed to continue to engage with Indigenous Nations and communities to solicit input. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		adsorption), then it will be extremely challenging for Denison to prevent the migration of contaminants in the restored solution. BNDN requires additional understanding of the modelling assumptions (as discussed above) and agreement on potential mitigation measures should attenuation of contaminants through adsorption occur at much lower rates than anticipated.						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>Table 3-10 of Appendix 7c of the draft EIS shows the expected adsorbing mineral properties of the mineral phases to which contaminants are expected to adsorb out of solution. BNDN notes that the lixiviant and restoration solution could affect the ability of adsorption. In particular, the clays immediately surrounding the orebody are within the freeze wall and will be directly exposed to the lixiviant during operations, which may impact the clays ability to adsorb contaminants out of solution. BNDN notes that the clays immediately surrounding the orebody may be soluble in the presence of the lixiviant or may be altered to have a lower capacity to adsorb metals. BNDN requires further information from Denison to have confidence that the clay phases which play a crucial role in contaminant attenuation will not have their adsorptive capacity impacted by the operation of the wellfield.</p> <p>Request/recommendation: BNDN requests that Denison provide available information on whether clay mineral phases are anticipated to dissolve through the ISR mining process, and whether the restoration solution will impact the ability of clays to effectively adsorb contaminants.</p> <p>This item would be best addressed and resolved with BNDN through the process agreement to address BNDN’s concerns related to long term groundwater contamination from the Project.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Provisionally Addressed.</b></p> <p>BNDN understands the modelling assumptions and</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #26)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Please see Denison's response above to BNDN Comment #24. Sorbing phases including clays were excluded from the mining area in the numeric model. Sorption occurs only to materials outside of the mining area that are not exposed to, and thus no altered by interaction with the mining solutions. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		would accept them assuming that the other unaddressed comments regarding modeling assumptions are addressed. Note that this does not address the need for a process agreement for the entirety of the Wheeler River Project with our Nation.						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In Section 1.1.1 of the Draft EIS, Denison notes that “the Gryphon deposit is not amenable to ISR mining and, accordingly, is not included in the EIS”. Denison has previously reported that the Gryphon deposit has nearly as much uranium as the Phoenix deposit. While the Gryphon deposit is not amenable to ISR, it is potentially still an economic resource which Denison may wish to mine. While the Gryphon deposit is not in scope for this environmental assessment, BNDN expects to be kept informed of future potential mining activities on the Wheeler River Project which Denison may be considering, including additional exploration on the Property, as future activities on the Property will also have impacts on our Treaty and aboriginal rights and interests.</p> <p>Request/recommendation: Given the potential longer term mining activities at the Wheeler River project beyond the Phoenix deposit, BNDN requests that any project agreement between BNDN and Denison include terms for ongoing dialogue related to future exploration and project development activities at the Wheeler River Project and at all Denison Projects on BNDN Ancestral Lands.</p> <p><b>BNDN Comment January 16, 2024:</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p> <p>BNDN notes that the acknowledgement addressed the concern specific to this comment but does not address the need for a process agreement for the entirety of the Wheeler River Project with our Nation.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #27)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison acknowledges that, if development of the Gryphon deposit as an underground mine is proposed in the future, this would require additional regulatory review and approval as well as engagement with Indigenous Communities of Interest. Please also refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.</p>	Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.

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Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>In Section 2.3.3.1.3 of the draft EIS Denison describes the proposed decontamination, demolition and disposal activities at the Project. BNDN notes that Denison has described a detailed process for decommissioning the injection and recovery wells but has not described how the freeze wells will be decommissioned. BNDN notes that the freeze well holes may serve as preferential pathways for contaminated groundwater movement. Given the proximity of freeze wells to the orebody and the number of freeze wells proposed to be drilled, proper closure of freeze wells is also important for protection water quality long term.</p> <p>Request/recommendation:</p> <p>a) BNDN request that Denison clarify the process by which they will decommission the freeze wells.</p> <p>b) BNDN requests that Denison decommission the freeze wells using the same process as is proposed for the decommissioning of the injection and recovery wells.</p> <p><b>BNDN Comment January 16, 2024</b></p> <p>BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b></p> <p>BNDN changed their position as outlined in the BNDN January 16, 2024 letter.</p> <p>Updated BNDN Position:</p> <p><b>Addressed</b>, pending future engagement on environmental matters with BNDN through a process agreement and eventual mutual benefits agreement.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #28)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The freeze holes will be decommissioned in the same manner as the ISR wellfield injection and recovery wells. All wells once decommissioned will undergo a mechanical integrity and leak off test prior to being grouted and sealed internally preventing interaction of surface water from the underlying aquifer at the mineralized depth. The freeze pipes, which will be located inside the freeze holes, will simply be unthreaded and removed from site after the freeze wall is no longer required.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>Denison describes the thawing of the freeze wall as part of the decommissioning of the mine. BNDN notes that water expands when frozen and could potentially be capable of expanding pre-existing joints and fractures within the host rock. BNDN is concerned that the thawing of the freeze wall could lead to expanded joints and fractures which would allow for far more rapid contaminant transport away from the ore body and restoration solution than is modelled in the post-decommissioning groundwater model. Request/recommendation: BNDN request that Denison provide evidence from academic literature or other mine sites employing freeze wall</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #29)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Please refer to the Attachment to IR-10 for information on the freeze wall integrity and basis for the design, which relies on site field data and lived experience from several existing Saskatchewan mining operations.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>technology to determine the extent the freeze wall could expands joints and fractures within the rock once thawed, including at unconformities or other pre-existing structural weaknesses within the host rock.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>Addressed</b>, pending future engagement on environmental matters with BNDN through a process agreement and eventual mutual benefits agreement.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Denison notes that they have made the conservative assumption that no water would be recycled as mining solution as part of their water balance calculations. BNDN agrees that this conservative assumption is appropriate for assessment of potential impacts of the Project. While this assumption is appropriate for the environmental assessment, BNDN wishes to understand the proportion of industrial wastewater that may be recycled on site and any commitments Denison is willing to make regarding continual refinement of the water treatment process to increase the proportion of water that is recycled. Request/recommendation: a) BNDN requests that Denison commit to continual refinement of the Industrial Waste Water Treatment Plant (IWWTP) treatment process to maximize the amount of water that is recycled to the deposit. b) BNDN recommends that the Crown include a condition of approval for the project regarding continual improvement of water treatment to maximize recycling. c) BNDN requests that Denison share available information on the proportion of water that they currently anticipate being able to recycle.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #30)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The EIS carried forward two options for the source of freshwater: 1) surface water and 2) groundwater. This freshwater will meet all Project needs for potable water, drilling, and process water and allow Denison to obtain the water from groundwater wells or from the surface water (Whitefish lake). The effluent quality and volume predictions in the EIS provide a bounding scenario of the basis of the assessment of Project effects. Denison is undertaking a sequential EA and licensing process under the Nuclear Safety and Control Act. For context, the EA process for a Project under CEAA 2012 and the Saskatchewan Environmental Assessment Act is long and complex. As such, the inputs and outputs (including IWWTP water recycle volumes and effluent quality) developed for the IWWTP were necessary and determined by Denison’s Project engineers early in the EA process to allow for the EIS biophysical and human assessments to advance. Detailed design information on the IWWTP, including recycle volumes, were not available, which is standard for engineering and EA sequencing for major projects. Denison intends to continue to refine effluent quality and volume predictions as part of the BATEA assessment and licensing phase of the Project. The predictions provided in the EIS will continue to bound the assessment, and provide a conservative representation of risk to human health and the environment. Further, more detailed information regarding the design and operation of the IWWTP and water management infrastructure (including discharge rates, recycle rates among many other things), as informed in part by the BATEA assessment, will be included with Denison's application for the license to operate which will provide opportunity for review and comment by Interested Parties. For reference, the IWWTP would be commissioned</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



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		<p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>Addressed</b>, pending future engagement on environmental matters with BNDN through a process agreement and eventual mutual benefits agreement. <b>Comments for regulators are not addressed</b> and will be addressed through future engagement with the appropriate regulator.</p>		prior to the Operation phase as no discharge of treated effluent would occur until that time.				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In Section 2.2.3.2 and Figure 2.2-15 of the draft EIS, Denison describes their water balance for the project and anticipated water needs to operate the ISR wellfield. BNDN notes that the EIS does not describe how Denison derived their estimate for the quantity of water required to operate the ISR wellfield. BNDN is concerned that the volume of water required to operate the wellfield may be substantially greater than is estimated in the draft EIS. Utilizing greater volumes of water in the wellfield would have cascading effects throughout the water balance, including greater demand on the IWWTP, greater storage volumes required in the process water storage pond, greater UBS holding pond capacity and greater volumes of effluent discharge to Whitefish Lake. BNDN is concerned with the potential cascading risks associated with an inaccurate assessment of the volume of water required to operate the ISR wellfield. BNDN also wishes to understand whether it is possible that Denison will be required to operate the wellfields at a higher pressure, even if only temporarily. BNDN notes that operating wells at higher pressure come with additional workplace and environmental hazards, especially when dealing with a strongly acidic lixiviant. Request/recommendation: a) To demonstrate that Denison has not significantly underestimated the volume of water required to operate the wellfield, BNDN requests that Denison provide evidence that the volume of water required to operate the wellfield is accurate. This should include an assessment of their level of confidence they have in their estimated water</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #31)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) Based on Denison's site-specific drilling, development, and pumping requirements over several years of exploration activities, the wellfield drilling water estimates presented in the EIS water balances are achievable. Denison's recently released feasibility study reaffirms the EIS assumptions related to water use and water recycle abilities.</p> <p>b) A key aspect of Denison's management system will be ongoing evaluation of the Project's performance compared to EIS predictions as well as continual improvement and adaptive management, as required. Should water consumption needs fall below those outlined in the EIS, Denison will follow all required permitting, licensing, and engagement with Indigenous nations and communities to describe and assess what those contingency measures would be.</p> <p>c) The near-field analysis (Section 8.2.4.2.3) identified that under all flow regime scenarios (i.e., 7Q10, monthly low, and monthly average), constituents are expected to be well mixed within Whitefish Lake (LA-5) and below the most restrictive criteria for the protection of aquatic life (Table 8.2-10; Appendix 8-C and Appendix 8-D). Additionally, the extent of the mixing zone in Whitefish Lake is estimated to be less than 5 m under all flow scenarios assessed (Table 8.2-11). Denison will comply with the Water Security Agency's Guidelines for Effluent Mixing Zones and Denison would update modeling if the base assumptions associated with the discharge of treated effluent to Whitefish Lake were changed, as needed. d) Wellfield pressures were described in the draft EIS, Sections 2.2.1.4.2 and 2.2.1.4.3. In terms of pressures, ISR mining is planned at nominal pressures of 100 psi and intermittent pressures of up to 250 psi.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>consumption.</p> <p>b) BNDN requests that Denison provide BNDN with information on potential contingency measures (such as constructing additional process water pond capacity) should their estimated water consumption be underestimated</p> <p>c) Denison must commit to updating their mixing zone assessment should they find it necessary to discharge greater quantities of effluent to Whitefish Lake than is estimated in the draft EIS.</p> <p>d) Denison must document the implications of operating the wellfield at a substantially higher pressure than currently expected.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Addressed.</b> <b>b. Addressed,</b> pending future engagement on environmental matters with BNDN through a process agreement and eventual mutual benefits agreement. <b>c. Addressed,</b> pending future engagement on environmental matters with BNDN through a process agreement and eventual mutual benefits agreement. <b>d. Not Addressed.</b> Denison has not provided information on the implications of operating the wellfield at substantially higher pressures than currently anticipated. This is important as ISR technology for ore extraction is novel in the Athabasca Basin and higher pressures than currently modeled may be required to achieve the uranium recovery rates anticipated by the Proponent. Further discussions on this matter should be done within the terms set out in a process agreement between Denison and BNDN for the Wheeler River Project.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Table 2.3-3 of the draft EIS shows Denison’s proposed mining area decommissioning objectives, which are the groundwater quality objectives for the residual water in the ore zone following the flushing of the system during mine decommissioning. BNDN is</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Groundwater remediation targets provided in the draft EIS were from derived from metallurgical test results completed from 2017 to 2021 with over 125 kg of material recovered from Phoenix deposit that underwent</p>	<p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As</p>	<p>Ongoing - Denison is committed to working toward reaching a</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward</p>

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		<p>surprised to see that relatively high concentrations of metals are expected to remain in the restoration solution as a final objective, such as 100 mg/l uranium and 2 mg/l cobalt, amongst many other metals. BNDN notes that potential risks to groundwater and surface water could be dramatically reduced through more stringent mining area decommissioning objectives. It is also feasible that processing efficiencies and high uranium prices may allow for substantially lower concentrations of uranium to be mined economically. The long-term contamination of groundwater from the high concentration of metals in the restoration solution is one of BNDN’s primary concerns with the Wheeler River Project, and BNDN would strongly prefer that Denison strive to minimize the residual contamination remaining in groundwater following decommissioning to the greatest extent possible. Request/recommendation:</p> <p>a) BNDN requests that Denison provide documentation that estimates the time, efforts and costs associated with reducing concentrations of metals in the restoration solution by 1 order of magnitude and 2 orders of magnitude. Note that these calculations should include costs that could be recovered by processing subeconomic UBS.</p> <p>b) BNDN requests that Denison work with BNDN through terms defined in a BNDN project agreement to establish achievable decommissioning objectives that would be satisfactory to BNDN.</p> <p>c) BNDN requests that the Crown place a condition of approval upon the Wheeler River Project that Denison is required to work with BNDN to establish mutually agreeable mining area decommissioning objectives.</p> <p>d) BNDN requests that Denison undertake a study of ISR operations elsewhere in the world to determine the lowest concentrations of UBS that could be processed economically utilizing industry best practices and commit to exceeding global standards.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN</p>	Comment #32)	<p>leaching and neutralization test work (see response to IR-67). In 2022 and 2023, metallurgical test work continued to further optimize remediation and strategies and confirm test work results presented in the draft EIS. It is expected that metallurgical test work will continue in the future to further optimize remediation targets, and this will be advanced through updates to the Decommissioning Plan. The Feasibility Field Test (FFT) provided additional confirmation that pH target and remediation targets could be met. Data gathered during the neutralization phase of the FFT provide confidence that groundwater targets proposed in the draft EIS can be met technically and economically. Based on laboratory testing and the results of the 2022 field testing, subsurface remediation is planned to consist of rinsing the ore zone with 35 pore volumes of fresh water, slowly raising the pH and then pumping about 75 pore volumes of basic solution through the same portion of the ore zone. This basic solution will in effect further raise the pH to a level that impedes further leaching of the deposit and reduces aqueous concentrations of contaminants of concern to below their environmental target levels. Refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final mining area decommissioning objectives will be developed prior to initiation of groundwater remediation as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for approval. The DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time.</p>	<p>part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time.</p>	<p>resolution on these issues.</p>		<p>a resolution on these issues.</p>

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		<p>January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Not Addressed.</b> BNDN does not see it as acceptable to postpone the commitment to more stringent residual water in the ore zone to later permitting stages. Denison did not respond to our request for additional contextual information on the additional costs to further reduce metals concentrations in the residual solution. BNDN reiterates this request and recommends that it be addressed within the protocols established in a process agreement between Denison and BNDN.</p> <p><b>b. Not Addressed.</b> BNDN reiterates our request to address these concerns through a process agreement and eventual mutual benefits agreement for the Project.</p> <p><b>c. Not Addressed.</b> BNDN intends to work with the Crown on this condition of approval.</p> <p><b>d. Not Addressed.</b> BNDN reiterates the request for the comparative analysis of reasonably achievable concentrations of uranium in the residual water. Comments for regulators are not addressed and will be addressed through future engagement with the appropriate regulator.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>In Figure 2.2-18 of the draft EIS, Denison shows the proposed design of the double composite liner system for the ponds on site and the uranium bearing solution (UBS) holding area. BNDN notes that the risks associated with temporary storage of UBS is much greater than other contact water on site which is proposed to be stored in a similar means. As such, BNDN is concerned that the proposed UBS holding area does not have adequate leak detection given the additional risk associated with the UBS relative to contact water on site. BNDN also notes that open air storage of UBS presents the risk of incidental interactions with wildlife near to the project (such as birds), which would potentially be acutely toxic. BNDN is also concerned that there is no leak detection system below the secondary HDPE geomembrane and geosynthetic clay liner. Should the secondary containment layers also become compromised, Denison does not have a system planned to detect this.</p> <p>Request/recommendation:</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #33, #82)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>As outlined in draft EIS Section 2.2.2.2.2, Denison will evaluate options to use tanks instead of holding area as engineering advances. It is also important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1). Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. The details requested by BNDN will be developed to support licensing and will be included in Management System programs / plans including for example the Groundwater Monitoring Plan and the Emergency Response and Preparedness Plan.</p>	<p>N/A</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>

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		<p>a) BNDN requests that Denison commit to storing UBS in appropriate tanks as opposed to open air storage.</p> <p>b) BNDN requests that Denison include a leak detection pipe in the prepared subgrade below the secondary containment as well as between the primary and secondary containment layers. BNDN also requests that the prepared subgrade be engineered to facilitate maximum utility of the leak detection below the secondary containment.</p> <p>c) BNDN requests that Denison undertake a risk assessment for the design of the UBS holding area. BNDN recommends the safer, less environmentally risky option be selected and that BNDN can review and provide input into the decision that Denison makes.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Not Addressed.</b> BNDN sees it as a reasonable and necessary precaution to store UBS in tanks instead of open air storage. BNDN reiterates this request and recommends that it be addressed within the protocols established in a process agreement between Denison and BNDN.</p> <p><b>b. Not Addressed.</b> BNDN sees it as a reasonable and necessary precaution to incorporate a leak detection system into UBS storage. BNDN reiterates this request and recommends that it be addressed within the protocols established in a process agreement between Denison and BNDN.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Denison shows an additional ore body to the Southwest of Phase 5. Denison has not included this additional ore body in the mine plan in the draft EIS and has not discussed whether they have intentions to mine this ore body or undertaking a project change at a later date to include this additional ore body. It is unclear whether this additional ore body has any implications for the long term groundwater quality modelling either through the additional orebody</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #34)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) and b) The small deposit to the SW of Phase 5 is amendable to ISR, but is of lower grade than the areas targeted in mining phases 1 through 5 and mining of that low grade areas is not being considered at this time. It is noted that The Project mining and milling capacity will be bound by the assumptions in the EIS, which includes a production rate higher than the current reserves. The Project would be reviewed to determine what if any changes to the design basis would be anticipated and then what permitting</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future



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		<p>altering anticipated groundwater chemistry, or the restoration solution dissolving metals in the additional orebody increasing overall metal loading. Given the probable difference in groundwater and mineral geochemistry in the additional orebody relative to the overlying sandstone and underlying basement rock, there is likely to be interaction between the restored solution and the additional orebody post-closure. Request/recommendation:</p> <p>a) BNDN requests that Denison clarify whether they are considering adding the additional orebody to the southwest of Phase 5 into the mine plan, including clarifying whether the additional ore body is amenable to ISR mining.</p> <p>b) BNDN requests that Denison clarify what the anticipated permitting associated with the additional ore body would be.</p> <p>c) BNDN requests that the post- decommissioning groundwater modelling for the Project include interactions between the additional ore body and the restoration solution to understand if the ore body poses a risk of additional metal loading to groundwater.</p> <p><b>BNDN Comment January 16, 2024:</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Addressed.</b></p>		<p>would be required, should additional mining beyond what is contemplate by the EA be considered in the future.</p> <p>c) The additional modelling recommended by the review comment is unnecessary at this time. The low grade area is not considered in the mine plan at this time. Should that change, as noted above, the Project would be reviewed to determine what if any changes to the design basis would be anticipated and then what permitting would be required. Such modeling as envisioned by the review comment would be done that time as may be required. Hydrogeological investigations have been ongoing in the field and in laboratories since 2014. Packer, open hole, and cross hole tests have been completed in conjunction with exploration drilling programs. As well, permeability tests have been completed on sections of available competent core within the Phoenix deposit. Open hole water level surveys have been completed across the site in 2015, 2017, 2021 and 2022. Data gathered during the field tests have been utilized for both the EA groundwater model as well as the mining model. The primary direction of groundwater flow at depth is to the north east, which means restored solutions will move away from the small deposit to the SW. Additionally, as noted in the response to BNDN Comment #32, the restored solution will be basic and will further raise the pH to a level that impedes further leaching of the deposit and reduces aqueous concentrations of contaminants of concern to below their environmental target levels.</p>				interests in the Project.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Denison intends to use a freeze wall as tertiary containment for the operation of the wellfield during operations. In general BNDN is supportive of this containment measure but requires further information to have confidence that the freeze walls will operate as designed. In particular, BNDN notes that while the freeze wall will be continuous from the ground surface all the way into the basement rocks underlying the orebody, the freeze wall is by far the most consequential immediately around the ore body itself. The orebody is approximately 400 m below the ground surface (where the earth would be significantly warmer) and the lixiviant is expected to be at least 10 degrees warmer than the surrounding groundwater would be. Considering that the cold</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #35)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) Please refer to the Attachment to IR-10 for information on the freeze wall integrity and basis for the design, which relies on site field data and lived experience from several existing Saskatchewan mining operations.</p> <p>b) The following explains how the continuous freeze wall will be monitored. The alignment of the freeze wall is located 25 m offset from the lateral extent of the recoverable ore and the freeze wall will grow in thickness both towards the ore and away from the ore. The freeze wall will solidify all liquid porewater and develop into a contiguous impermeable barrier many metres thick. Ground temperature monitoring will be installed through a series of continuous fiberoptic temperature and pressure wells from surface to the depth of impermeable basement rock below the unconformity. Such monitoring wells/systems will be installed on both the ore (inside) and non-ore (outside) sides of the freeze wall to</p>	<p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>



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		<p>brine will need to be injected nearly half a kilometer into the earth where warm lixiviant will be injected into the wellfield, BNDN is concerned that the freeze wall may be ineffective in and around the ore body where it is required. Furthermore BNDN is concerned that the monitoring system for assessing the stability of the freeze wall may not adequately detect the continuity of the freeze wall at depth. As such, BNDN is concerned that the freeze wall may be ineffective and in fact obscure our ability to recognize contamination of the surrounding groundwater from the freeze wall operating ineffectively.</p> <p>Request/recommendation:</p> <p>a) BNDN requests that Denison provide information to demonstrate that the freeze wall will in fact be frozen in and around the ore body. If there is any doubt that the freeze wall will indeed be frozen around the ore body, Denison should describe further measures they can undertake to ensure that the freeze wall is frozen as intended around the ore body.</p> <p>b) Denison must provide BNDN with further information on how they will monitor the performance and continuity of the freeze wall.</p> <p>c) BNDN requests further information on the proposed groundwater monitoring program around the wellfield.</p> <p>d) BNDN requests the opportunity to review the groundwater monitoring plan and to review groundwater monitoring data as part of a BNDN-Denison environmental committee developed through a BNDN-Denison project agreement.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Addressed</b>, pending future engagement on environmental matters with BNDN through a process agreement and eventual mutual benefits agreement.</p> <p><b>b. Addressed</b>, pending future engagement on environmental matters with BNDN through a process agreement and eventual mutual benefits agreement.</p> <p><b>c. Not Addressed</b>, BNDN requires a commitment</p>		<p>confirm the thickness of frozen ground. There will be sufficient operational controls in place to verify that the freeze plant is operating, to measure the temperature in the ore zone, and to measure the temperature on opposite sides (inside and outside) of the freeze wall so that early detection of any upset conditions can be identified and addressed. Options for addressing issues include: lowering the temperature of the freeze system to draw more heat out; increasing the freeze coolant flow rates in freeze wells nearer to active ISR cells; and/or to adaptively manage the lixiviant injection and recovery rates in cells located nearest to the freeze wall.</p> <p>c) Regarding the monitoring program: A framework for the groundwater monitoring plan was provided in Section 7.8.2 of the draft EIS and is commensurate with the level of development of the Project. Further details regarding the Environmental Management Program and its associated plans (of which the groundwater monitoring plan is one) will be developed later in 2023 and 2024 as part of the licensing process. Engagement on licensing requirements, including on program and plan documentation will occur at that time.</p> <p>d) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project, such as BNDN. Denison does not anticipate separate funding for BNDN at this time.</p>				

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		from Denison to include BNDN into the development and implementation of the monitoring plan, which should be formalized in a BNDN-Denison process agreement and eventual Mutual Benefits Agreement. <b>d. Not Addressed</b> , BNDN requires a commitment from Denison to include BNDN into the development and implementation of the monitoring plan, which should be formalized in a BNDN-Denison process agreement and eventual Mutual Benefits Agreement.						
Birch Narrows Dene Nation	Other	<b>BNDN Comment February 28, 2023</b> In Section 7.6.2.3 of the draft EIS and the geology and groundwater summary table in Appendix 16A, Denison states that they expect no residual effects to groundwater quality during the operations, decommissioning or future centuries period of the Project. Denison has also not placed a significance determination on the impacts to groundwater quality based on the findings of the draft EIS due to groundwater being considered an intermediate VC. BNDN disagrees with both the residual effects assessment and the fact that groundwater quality has been assessed solely as an intermediate VC. The protection of groundwater resources is highly important to BNDN. Our members place immense value on clean spring water and the protection of groundwater more generally. The advancement of the Wheeler River Project will permanently impair groundwater resources in and around the Wheeler River Project. The contamination of groundwater at the Project will have a significant impact on our members' connection to the land and ability to exercise our Treaty and Aboriginal rights. BNDN see the limited interpretation of residual effects and the lack of inclusion of groundwater quality as a receptor VC as a significant oversight in the assessment of impacts of the Project on the environment and BNDN Treaty and Aboriginal rights. This must be corrected to properly assess the Project and thus ensure that project impacts are appropriately mitigated and accommodated. Request/recommendation: a) Denison must apply a significant determination to groundwater quality and quantity for all projects phases, including the future centuries period. The significance determination must be developed following consultation and engagement with BNDN. b) Denison must re-evaluate the residual effects of the project on groundwater quality including the	BNDN Public Comment February 28, 2023 (BNDN Public Comment #37)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  The Groundwater Quality VC was carried through the EIS as an intermediate VC. The shallow and deeper groundwaters are not considered to be a potable water source currently nor in the future within the LSA (defined in Section 7.1.3.1), as detailed in Section 7.1.1.1. Within the LSA, the Groundwater VC was considered an intermediate VC as it is a pathway to the aquatic environment and considered in the future centuries period in Section 8. It is also important to note that the mining area is 400 m below surface and the existing/baseline groundwater quality in the ore zone area is poor (e.g., high in iron and uranium compared to shallower groundwater; Figure 7.3-11). Section 7.6 describes the residual effects evaluation for geology and groundwater, including for the life of mine (0 to 38 years) and the future centuries period. It is Denison's opinion that the approach associated with evaluating Project effects to groundwater quality is appropriate and reasonable for the reasons presented in the draft EIS. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. One of the key goals of such collaboration with each Indigenous nation will be to provide the information necessary to the communities such that it provides confidence to community members regarding the impacts from the Project to the aspects of the environment which matter the most to them. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous First Nations who may have interest in the Project. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested	Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. One of the key goals of such collaboration with each Indigenous nation will be to provide the information necessary to the communities such that it provides confidence to community members regarding the impacts from the Project to the aspects of the environment which matter the most to them. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous First Nations who may have interest in the Project.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>future centuries period. This re-evaluation must be following consultation and engagement with BNDN.</p> <p>c) BNDN requests that the CNSC work with our Nation to understand the significant impacts that the permanent contamination of groundwater caused by the project will have on our Treaty and Aboriginal rights.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Not Addressed.</b> BNDN reiterates our request to carry through groundwater as a receptor VC, as groundwater resources are highly culturally and spiritually important to our Nation.</p> <p><b>b. Not Addressed.</b> BNDN reiterates our request to carry through groundwater as a receptor VC into the future centuries period, as groundwater resources are highly culturally and spiritually important to our Nation.</p> <p><b>c. Not Addressed.</b> Comments for regulators are not addressed and will be addressed through future engagement with the appropriate regulator.</p>		<p>Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Section 7.8.2 of the draft EIS documents the groundwater monitoring proposed for the surface facilities and the ISR recovery area. It also describes a conceptual excursion contingency plan wherein Denison has proposed their plans to manage situations where groundwater contamination occurs beyond what is predicted in the EIS. BNDN notes that Section 7.8.2 lacks information on the involvement of Indigenous Nations related to groundwater monitoring. As stated previously, BNDN is highly concerned with the level of impact the Project will have on groundwater resources. As such BNDN requires Denison to communicate excursions of groundwater and the consequent management of excursions to our Nation. Request/recommendation:</p> <p>a) BNDN requests that Denison revise Section 7.8.2 to include Indigenous engagement and input for groundwater monitoring results and the</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #38)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023) 4</b></p> <p>Denison agrees with BNDN's comment that groundwater monitoring will be an important component of the Project as it advances. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project,</p>	<p>Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. One of the key goals of such collaboration with each Indigenous nation will be to provide the information necessary to the communities such that it provides confidence to community members regarding the impacts from the Project to the aspects of the environment which matter the most to them. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous First Nations who may have interest in the Project.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>

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		<p>management of observed groundwater excursions. The manner in which Denison engages BNDN on groundwater monitoring and management will likely occur through an Environmental Committee, which should be defined in a BNDN-Denison Project Agreement.</p> <p>b) BNDN requests that the CNSC impose a condition of approval on the Project that clarifies that Denison is required to engage with impacted Indigenous Nations such as BNDN on groundwater monitoring and management.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN has reasonably requested that Denison work with our Nation in identifying background sampling sites. It is expected that such sites could be chosen in such a way that aligns with Denison’s goals of obtaining reference information and implementing a BACI design for ongoing monitoring. The outright refusal of even discussing such a possibility with BNDN is not reflective of the need for meaningful consultation on this Project.</p>		<p>and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In Appendix 8d, Denison documents their baseline aquatics studies undertaken for the Wheeler River EIS. Denison has included some lakes and rivers upstream of the Project as background sites for understanding project impacts to the aquatic environment. BNDN notes that there are many additional sites throughout our Ancestral Lands which would benefit from ongoing aquatic monitoring and would be potentially suitable for the Project as background sampling sites. Request/recommendation: BNDN requests that Denison work with our Nation to identify potential additional background sampling sites within our Ancestral Lands for aquatic monitoring for the life of Project. The details of such should be defined in the BNDN-Denison project agreement.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #39)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison appreciates and acknowledges the recommendation. At this time Denison believes suitable candidate references areas are available upstream of the Project site in areas located in the same drainage system / watershed. While proximity to the Project is only one of many considerations for suitable reference area selection in this case the ability to be able to compare relevant measurement endpoints between "reference" vs "potentially influence" sampling locations where the primary difference between locations is the point source discharge is compelling rationale. Additionally, data that have been collected from upstream areas as part of baseline programs provides the opportunity to implement aquatic monitoring according to a BACI design which is a powerful means by which to assess and isolate potential mine related effects from natural environmental change. Given the above, Denison does not see that there is rationale for investigating lakes over a regional extent to establish reference areas for aquatic monitoring as is suggested.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN has reasonably requested that Denison work with our Nation in identifying background sampling sites. It is expected that such sites could be chosen in such a way that aligns with Denison’s goals of obtaining reference information and implementing a BACI design for ongoing monitoring. The outright refusal of even discussing such a possibility with BNDN is not reflective of the need for meaningful consultation on this Project.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In Section 2.2.1.4.2 of the Draft EIS Denison discusses the operation of the wellfield during the operations phase of the mine. BNDN notes that many of the details in this section are conceptual in nature and thus could require significant refinements in design to achieve the desired recovery consistently throughout the life of mine. Amongst other concerns related to operations of the ISR wellfield, BNDN is concerned that Denison may alter the chemical composition of the lixiviant used in the ISR wellfield which could cause inadequately understood changes in potential effects of the Project to the environment. These effects could include significant changes to the final restorative solution at the end of mine life or significant changes in the treatment requirements for the IWWTP that impact the ability of Denison to achieve effluent quality criteria for significant periods of time. Request/recommendation: a) BNDN requests that Denison provide information on: (i) the likelihood of the chemical composition of the lixiviant changing throughout the life of project, (ii) potential changes to the lixiviant composition, and (iii) the implications for long term groundwater quality and effluent treatment from changes in lixiviant chemistry b) BNDN requests that Denison commit to ongoing communications and engagement with BNDN regarding changes to the wellfield operation</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #40)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) It is important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1). Detailed ISR mining-related information needed to support licensing and permitting has not been included in the EIS; it will be provided to regulators as part of permitting and licensing. For the EIS, an initial understanding of the mine plan and mining area remediation was needed to initiate the assessment of migration of constituents of potential concern in groundwater out of this area in the post-decommissioning period. The findings and conclusions of the EIS were also used, in turn, to inform and bound the engineering and feasibility work. As part of the metallurgical test program, over 125kg of core from the Phoenix deposit has been leached in a variety of settings, including bottle rolls, column tests, and intact core tests. This has helped to predict concentrations of both the lixiviant as well as the production solutions. The lixiviant (mining solution) concentrations will vary depending on each individual well production profile. To ensure reagent consumption is effective and efficient it will be varied during the life of each well dependent on its characteristics. The initial acidification of the well requires a lower acid content to ensure the formation does not plug due to precipitation, whereas during periods of high production the well can accept a higher acid concentration. Towards the end of the recovery curve, the uranium is more difficult to access and therefore the strength of the acid or the flow rate to the well need to be optimized to ensure efficient use of reagents. It is expected that the lixiviant concentrations will vary between 0-60 g/L H2SO4, and 0-20g/L H2O2 and will be situationally dependent. There is also the capability to add Fe2(SO4)3, however it is not expected that this will be required in significant concentration due to the natural abundance of iron in the deposit.</p>	Please see response to Comment #19 for Denison's response on a Project agreement.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



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		<p>throughout the life of mine. The terms of engagement should be defined in a BNDN-Denison project Agreement.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Not Addressed.</b> BNDN note that Denison has not provided BNDN with the information that the Nation requested regarding changes in chemical composition of the lixiviant (other than changes in acid concentrations). BNDN reiterates the request for additional information.</p> <p><b>b. Not Addressed.</b> Denison has thus far denied BNDN’s reasonable request for a process agreement and eventual project agreement despite the projects impacts to our Nations rights and interests; BNDN reiterates our request.</p>		<p>b) Please see response to Comment #19 for Denison's response on a Project agreement.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Table 4 of Appendix 8e of the draft EIS shows the predicted site discharge concentrations of the contaminants of potential concern (COPCs). BNDN notes that the concentrations of a number of COPCs do not achieve water quality objectives that is the best available technology economically achievable (BATEA). Example COPCs include copper, molybdenum, selenium, uranium, vanadium, zinc and ammonia. BNDN requires proponents operating on our Ancestral Lands to, at a minimum, achieve BATEA standards for effluent treatment and discharge. This takes reasonable and appropriate precaution without imposing unreasonable costs on the operation. Request/recommendation: a) BNDN requests that Denison commit to achieving BATEA criteria for all COPCs in their effluent. b) Denison must work with BNDN to identify mutually agreeable and appropriate effluent discharge criteria for their effluent. BNDN expects that identifying suitable effluent discharge criteria</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #41)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) Denison is undertaking a sequential EA and licensing process under the NSCA. For context, the EA process for a Project under CEAA 2012 and the Saskatchewan Environmental Assessment Act is long and complex. As such, the inputs and outputs (e.g., effluent quality) needed for the EIS were developed by Denison’s Project engineers early in the EA process to allow for the biophysical and human assessments to advance. An example of one of these outputs is the IWWTP effluent quality. The effluent quality predictions in the EIS provide a bounding scenario of the basis of the assessment of Project effects. As stated in the Draft REGDOC 2.9.2 Denison understands that a BATEA assessment be conducted to determine the predicted design release characteristics as part of the licence application for a new facility or activity. Outside of the EIS process, the Project detailed engineering is progressing, including the design of the IWWTP and associated refinement of effluent quality predictions. Denison is following Draft REGDOC 2.9.2 to arrive at a treatment option that remains within the bounds of the EA, which ultimately predicts no significant impacts to the receiving environment. The maximum design release characteristics for the IWWTP will be provided as part of Denison’s licence application to the CNSC.</p>	<p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to engagement with English River First Nation and Kineepik Métis Local as it relates to effluent discharge criteria, suited to each of their interests and needs. Denison does not anticipate working closely with BNDN on this topic.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>



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		<p>will be undertaken through an Environmental Committee with a terms of reference defined in a BNDN-Denison project agreement</p> <p>c) BNDN requests that the CNSC impose a condition of approval on the Project that BNDN is engaged.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>a. Not Addressed.</b> BNDN notes that Denison has not made the requested commitment around achieving BATEA for all effluent COPCs.</p> <p><b>b. Not Addressed.</b> BNDN requires Denison to commit to ongoing engagement with our Nation on determining suitable effluent discharge criteria for the IWWTP. The engagement process should be formalized in a BNDN-Denison process agreement and eventual Mutual Benefits Agreement.</p> <p><b>Comments for regulators are not addressed</b> and will be addressed through future engagement with the appropriate regulator.</p>		<p>b) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to engagement with English River First Nation and Kineepik Métis Local as it relates to effluent discharge criteria, suited to each of their interests and needs. Denison does not anticipate working closely with BNDN on this topic.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Table 7 of draft EIS Appendix 8e shows the anticipated size of the mixing zone under 3 different flow conditions, including the calculated 7Q10 flow. While BNDN understands that Denison expects to discharge relatively small volumes of effluent to Whitefish Lake compared to a conventional open pit or underground mining operation, BNDN is concerned that the mixing zone assessment underestimates the magnitude of impact that the project will have on Whitefish Lake. Request/recommendation: BNDN requests that Denison undertake a plume delineation study and provide BNDN the opportunity to review the findings of the study through the BNDN-Denison Environmental Committee for the Wheeler River Project.</p> <p><b>BNDN Comment January 16, 2024:</b></p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #42)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The prediction uncertainty analysis (i.e., "sensitivity analysis") presented in Appendix 7-C included an evaluation of the change in the model prediction (i.e., plume migration) with respect to changes in the conductivity of materials along the flow path to the receptor, Whitefish Lake (i.e., Scenarios 4, 5, and 6) as well as regarding the hydraulic conductivity of the mined-out ore zone. As such we feel that the work requested by the reviewer has already been completed and reported upon within the draft EIS. In addition, the uncertainty of the Intermediate Sandstone Aquifer was evaluated (see IR55), where higher hydraulic conductivity within the Intermediate Sandstone Aquifer were found to reduce the proportion of water from the ore zone reaching Whitefish Lake, which would have the effect of further reducing (i.e., diluting) concentrations simulated and presented in the EIS documentation. As such, the conditions documented in the draft EIS are already conservative with respect to the uncertainty in these parameters. The near-field analysis (Section 8.2.4.2.3) identified that under all flow regime scenarios (i.e., 7Q10, monthly low, and monthly</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.

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		<p>BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Addressed</b>.</p>		<p>average), constituents are expected to be well mixed within Whitefish Lake (LA-5) and below the most restrictive criteria for the protection of aquatic life (Table 8.2-10; Appendix 8-C and Appendix 8-D). Additionally, the extent of the mixing zone in Whitefish Lake is estimated to be less than 5 m under all flow scenarios assessed (Table 8.2-11). Denison will comply with the Water Security Agency's Guidelines for Effluent Mixing Zones. The above notwithstanding in-field confirmation of the extent of the effluent mixing zone is anticipated following commissioning of the IWWTP and effluent discharge system during the Operation phase of the Project.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> In Table 2.2-4 of the Draft EIS, Denison documents their planned chemical used for the project. BNDN notes that Denison intends to use zero-valent iron (ZVI) in the IWWTP, but not as part of the remediation solution for the mine. BNDN notes that ZVI is used to treat contaminants in groundwater around the world. Denison has not discussed whether they have investigated the possibility of utilizing ZVI to remediate the wellfield during decommissioning. Protection of groundwater is of exceptional importance to BNDN. BNDN is concerned that Denison has not made a complete or comprehensive effort to understand how to minimize negative impacts to groundwater from the project using proven technologies that may be suitable for remediating the restoration solution in the wellfield during the decommissioning phase of the mine. Request/recommendation: BNDN requests that Denison investigate the suitability of using zero-valent iron to remediate the groundwater within the wellfield as part of the decommissioning process.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed</b>.</p> <p>BNDN requires a commitment from Denison around groundwater remediation. If Denison wishes to defer certain aspects of BNDN's requests to the Decommissioning Plan, BNDN requires a commitment from Denison negotiate a Project Agreement with our Nation to give confidence that these matters will be</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #44)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Refinement of the mining area decommissioning objectives and associated modelling will be done through updates to the Decommissioning Plan and will be bounded by the objectives evaluated in the EIS. The use of zero-valent iron will be evaluated, as applicable.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		addressed in a manner that mitigates impacts to our rights.						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>BNDN is concerned that the small volume of Effluent Monitoring and Release Ponds may create a lack of operational flexibility. For example, in the EIS, it is stated that:</p> <p>“Treated water from the IWWTP will be pumped to the three Effluent Monitoring and Release Ponds (each 3,300 m3). These ponds will be designed to hold effluent for 72 hours for testing before discharge to the environment.” – EIS, pp 723</p> <p>If water quality in these ponds exceeds discharge criteria then there may be a need to store water so that additional treatment and monitoring can occur prior to discharge. However, only having capacity for three days of storage means it is unlikely the Proponent would be able to adequately treat water prior to reaching storage capacity, resulting in a need for emergency release of poor- quality water.</p> <p>Request/recommendation:</p> <p>a) BNDN requests that additional storage capacity be included as part of the design for water management system. This must include adequate storage capacity to ensure Denison has the ability to retain water for sufficient time to allow treatment, in the event that exceedances of water quality discharge criteria occur. Alternatively, Denison can commit to halting discharge (and operations if required) should water quality exceed discharge criteria. Discharge into Whitefish Lake would resume once water quality in the Effluent Monitoring and Release Ponds has been returned to below discharge criteria.</p> <p>b) BNDN requests that the CNSC impose a condition of approval for the Project that requires Denison to must meet effluent discharge criteria prior to discharge and must halt operations if treated effluent in the monitoring and release ponds does not meet effluent discharge criteria.</p> <p><b>BNDN Comment January 16, 2024</b></p> <p>BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b></p> <p>BNDN changed their position as outlined in the BNDN January 16, 2024 letter.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #45)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) During Construction, no effluent is expected to be released to the aquatic environment. Contact water stored in the Clean Waste Rock Pond during Construction will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / license requirements. The sequence for Construction activities will occur in a logical manner based on Project execution plans. For example, construction of the wellfield runoff pond will be prioritized during the early part of Construction and it will able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the Clean Waste Rock Pond. Other secondary contingency measures are also available should the volume of water requiring management exceed site infrastructure storage volume. This could include use a hydrovac for offsite disposal. Section 2 Project Description, Section 2.2.3.9 Treated Effluent Monitoring and Release Ponds of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond.</p> <p>b) Denison expects the Provincial Approval to Operate a Pollutant Control Facility will contain specific effluent quality limits and monitoring to confirm effluent quality meets the approved limits. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>Updated BNDN Position:</p> <p><b>a. Not Addressed.</b> BNDN notes that the Proponent has not addressed the fact that this is a concern for the operational phase of the mine site and is specific to the efficacy of the effluent treatment plant. BNDN reiterates the request for the Proponent to design the effluent monitoring and release ponds to be increased in capacity to have at least 3 weeks of storage capacity.</p> <p><b>b. Not Addressed.</b> BNDN intends to work with the Crown on this condition of approval. <b>Comments for regulators are not addressed</b> and will be addressed through future engagement with the appropriate regulator.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Fish community sampling is an important component of baseline studies for many reasons, including identifying species present (including any species at risk) and evaluating relative abundance (e.g. CPUE). A robust program should include multi- season and multi-year approach. This allows improved characterization of seasonal habitat use and accounts for natural variability. In the baseline aquatic assessments, the Proponent has focused fish community sampling in fall 2016, with some limited additional sampling of in spring 2017. This low level of effort will make it difficult to draw meaningful comparisons with monitoring work that will occur during the life of mine. Furthermore, CPUE has only been reported for electrofishing effort. As a result, there is very limited information available for relative abundance of fish in important waterbodies, including Whitefish Lake, McGowan Lake, and Russell Lake. Request/recommendation: a) BNDN requests that the Proponent build on the existing data for fish community sampling by collecting an additional round of spring and fall sampling. b) BNDN requests that an assessment of total effort, total catch, and CPUE be provided for each capture method/location where fish sampling has occurred.</p> <p><b>BNDN Comment January 16, 2024</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #46)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>It is Denison's and their aquatic SME's opinion that the baseline fish community sampling efforts, including information provide from Indigenous and local resource users, provide a sufficient basis for conducting an effects assessment (draft EIS Section 8.3 Fish and Fish Habitat). Based on the information collected there is a good understanding of fish species presence / absence, relative abundance, fish habitat characteristics including areas that contribute to important life history stages (e.g., spawning areas) and fish habitat use. Denison does not believe further extensive baseline collection are needed to support the environmental assessment process but will implement targeted aquatic surveys prior to site development (see below). With respect to inclusion of the additional information requested the following is noted. Both detailed and summary data are presented in the Baseline Aquatic Environment Report that was provided as an appendix to the draft EIS. Effort and catch by sampling gear type by sampling location are shown for example in Table A-13 of the Baseline Aquatic Environment Report and metrics such as CPUE and total catches can be derived from these data if desired. Denison does not see the need to derive these metrics for presentation in the final version of the EIS (and supporting documents). This is in part related to the fact that the aquatic effects assessment did use abundance / relative abundance metrics such as CPUE as measurable parameters (MPs; a parameter or metric associated with a key indicator that can be used to detect and measure Project-related changes) to represent the fish and fish habitat VC, nor would it have been practical to use them for this purpose. There would be no practical or reliable way to derive such a prediction of change relative to Protect-aquatic habitat interactions. While abundance / relative abundance metrics may be reported during future monitoring they would not likely be seen as a key measurable parameter for fish</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position:</p> <p><b>46 a. Not Addressed</b> It is BNDN’s opinion that the baseline fish community sampling efforts do not provide a sufficient basis for conducting an effects assessment. It is standard practice for aquatic baseline surveys to be undertaken in spring and fall for at least two years. Conducting relatively low community sampling effort in Sept 2016 and May 2017 does not provide adequate information on species diversity, abundance, or other measures of fish health for meaningful comparison. Such limited data creates a high likelihood of sampling bias and will make it exceedingly difficult to distinguish whether future changes are a result of impacts from the project or simply natural variations.</p> <p><b>46 b. Addressed</b></p>		<p>monitoring. More subtle measures of fish health would be used for this purpose - it is reasonable to assume that fish health measures will be more sensitive to change than abundance measures and provide an earlier indication of potential Project-related effects. This is what is envisioned and required by the MDMER EEM program, whereby measures of fish health (e.g., growth, reproduction, condition) are used to assess potential effects. As noted above, Denison will implement targeted aquatic surveys prior to site development. At this time, it is envisioned that a pre-development EEM program survey following guidance provided in the Metal Mining Technical Guidance Document will be implemented at the site, with sampling at future effluent exposed and reference areas. Best practice is to undertake an analysis of candidate reference areas using the existing baseline information and investigate their utility as controls prior to project development. Execution of the pre-development EEM represents a Before-After-Control-Impact (BACI) design for aquatic monitoring, that will provide the ability to monitor change temporally (among sampling periods) and spatially (among sampling areas), thereby providing a more robust means by which to assess potential mine related effects.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent has identified one mitigation measure that includes sharing of monitoring results to assess performance of water management system (EIS, pp 8-90, 8.2.5 Mitigation Measures). BNDN is supportive of this type of information sharing and believes that it can be an important component of transparency and trust- building between the Proponent and other parties. However, it is important that information sharing be done in a way that is accessible to community members. Request/recommendation: - BNDN requests involvement in discussions with Denison about sharing of information related to water quality monitoring (and environmental monitoring more broadly). Some methods of communication that may support accessibility of data include: o Public-facing summary reports on a regular schedule (e.g. quarterly or annually) o Real-time access to environmental monitoring data through online database portals. o Semi-regular community meetings hosted in Turnor Lake (e.g. every 12-18 months, as decided in conjunction with BNDN leadership within a Project</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #47)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison agrees with BNDN that water quality monitoring will be interest to Indigenous nations and communities. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Further details on the Public Information Program and Public Disclosure will form part of the documentation submitted in support of the CNSC licensing for the Project. It is also noted for further reference that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (<a href="https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm">https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm</a>), and the Eastern Athabasca Regional Monitoring Program (<a href="http://www.earmp.ca/">www.earmp.ca/</a>). Results from these programs provide relevant information and can complement Denison’s Project-specific monitoring program. One forum for discussion of monitoring results is the Northern</p>	Please see response to Comment #19 for Denison's response on a Project agreement.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



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		<p>Agreement with BNDN).</p> <ul style="list-style-type: none"><li>o Presentations to BNDN staff, leadership, and/or community members by BNDN Environmental Monitors. The specific methods used for information sharing and appropriate levels of support from Denison can be determined through consultation with BNDN.</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Partially Addressed.</b></p> <p>BNDN agrees that the information shared with English River First Nation and the Kineepik Métis Local is likely to be of interest to BNDN. However, our request for discussions with Denison about information sharing have been ignored. The refusal of even discussing such a possibility with BNDN is not reflective of the need for meaningful consultation on this Project.</p>		<p>Saskatchewan Environmental Quality Committee(<a href="https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-saskatchewan-environmental-quality-committee">https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-saskatchewan-environmental-quality-committee</a>). Please see response to Comment #19 for Denison's response on a Project agreement.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent has completed predictive modelling for concentrations of contaminants in fish tissue. For example, results of modeling for selenium indicate that concentrations will fluctuate throughout operations but remain below the recommended criterion of 2.83 mg/kg wet weight (from the US EPA). Should the Project proceed, information on contaminants in fish tissues will be highly relevant for BNDN and land users who eat fish from the area. Request/recommendation: -BNDN requests that results of fish tissue monitoring (e.g. EEM studies) be shared in a publicly available and accessible way. This must include comparisons with guidelines and information on other contaminants of importance (e.g. mercury). Discussions regarding how this information can be shared with BNDN should occur alongside the discussions related to water quality monitoring results.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #48)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison agrees with BNDN that results of fish tissue monitoring will be interest to Indigenous nations and communities. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Further details on the Public Information Program and Public Disclosure will form part of the documentation submitted in support of the CNSC licensing for the Project. It is also noted for further reference that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (<a href="https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm">https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm</a>), and the Eastern Athabasca Regional Monitoring Program (<a href="http://www.earmp.ca/">www.earmp.ca/</a>). Results from these programs provide relevant information and can complement Denison's Project-specific monitoring</p>	<p>Please see response to Comment #19 for Denison's response on a Project agreement.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>



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		<p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Partially Addressed.</b></p> <p>BNDN agrees that the information shared with English River First Nation and the Kineepik Métis Local is likely to be of interest to BNDN. However, our request for discussions with Denison about information sharing have been ignored. The refusal of even discussing such a possibility with BNDN is not reflective of the need for meaningful consultation on this Project.</p>		<p>program. One forum for discussion of monitoring results is the Northern Saskatchewan Environmental Quality Committee(<a href="https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-saskatchewan-environmental-quality-committee">https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-saskatchewan-environmental-quality-committee</a>). Please see response to Comment #19 for Denison's response on a Project agreement.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Increased fishing pressure in Whitefish Lake from employees working at the Project site and increased ability for visitors due to improved access could negatively impact fish populations. Preferred species, large-bodied fish, and older individuals are most likely to be targeted. This may have negative consequences on the population structure of fish in the lake as well as the ability of BNDN members to exercise fishing rights. Request/recommendation: - BNDN recommends that the policies Denison sets related to staff and contractors fishing while on site are determined collaboratively with BNDN through the Environmental Committee defined in a BNDN-Denison project agreement.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #49)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. As described in the draft EIS, workforce members will be transported to/from site via a fly-in/fly-out rotation and will, therefore, not use ground travel options during shift changes, which will eliminate fishing on local lakes during commutes to/from the site and during time off work. Denison site vehicles will not be available for recreational purposes. While at the Project site and off duty, workers may opt to fish local waterbodies. To protect sustainable use of resources, only catch and release of fish will be encouraged, and fish storage or cooking facilities will not be provided. To prevent entry of land users from entering the Project Area, Denison will control access to the property with both a north and south security gate. Overall, given a lack of resources to access fishing locations and store fish harvests, workforce fishing is expected to cause minimal disturbances to local users. Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take a distinctions based approach (i.e., the potential impact on each Indigenous community is not evaluated separately), but rather on the key indicators and associated measurable parameters. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal. As outlined in Denison's Indigenous Peoples Policy, Denison</p>	Detailed Project plans and programs related to staff and contractor fishing will be developed to support Project permitting and licensing efforts.	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.

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				is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible. Detailed Project plans and programs related to staff and contractor fishing will be developed to support Project permitting and licensing efforts.				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The EIS provides very few details regarding how spills, leaks, and other accidents and malfunctions will be managed to mitigate the impacts on fish and fish habitat. Over the life of the mine there will inevitably be accidents and malfunctions. One of the most common environmental issues that will be encountered is leaks and spills. These can typically be managed through good monitoring and preparedness, though if they occur near water, the ability to clean them quickly is difficult and can result in harm to aquatic communities. Request/recommendation: -BNDN request additional information regarding the development of spill prevention programs, emergency management procedures, and monitoring and remediation programs for accidents and malfunctions. Representatives from BNDN need to be included in the planning and execution of monitoring and remediation activities to provide community perspectives in Project activities. One method through which BNDN can be involved in these discussions is through the development of an Environmental Committee.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Partially Addressed.</b></p> <p>BNDN appreciates the additional information provided on accidents and malfunctions and on the Emergency Preparedness and Response Program. However, BNDN notes that the refusal to develop an Environmental Committee or similar mechanism with BNDN is not reflective of the need for meaningful consultation and active involvement on this Project.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #50)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>A standalone Accidents and Malfunctions (A&amp;M) assessment was completed and is summarized in Section 14 of the EIS (full report is Appendix 14-A of the EIS). The A&amp;M assessment considered almost 70 accident scenarios including many that would relate to the unplanned release of chemicals and radiation to the environment with potential to effect country foods. Specific scenarios including the release of chemicals and radiation to the aquatic environment and to the terrestrial environment adjacent to the ERFN and KML culture camps located along Hwy 914. The overall risks in consideration of likelihood and consequence were characterized as low. The assessment concluded that with planned engineering / environmental design features, mitigation measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical. Section 2.9.1.3 of the draft EIS provides Denison's commitment to develop an Environmental Management System, which includes an Emergency Preparedness and Response Program (EPRP) and an Environmental Protection Program (EPP; including an Environmental Monitoring Plan). The EPRP would be established to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. The EPP would be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets that Denison may set. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. A such, the details of these programs and plans will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the current stage of the Project approvals process. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an</p>	Section 2.9.1.3 of the draft EIS provides Denison's commitment to develop an Environmental Management System. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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				agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and program spatial boundaries will be sufficiently extensive to measure EIS predictions.				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>Mitigation measures are an important component of Project management which are critical for environmental protection. Upon review of the suggested mitigation measures, BNDN has identified some opportunities for additional mitigation. Request/recommendation:</p> <ul style="list-style-type: none"><li>-BNDN request that the following standard mitigation measures be included as part of the list described in Section 8.3.5:</li><li>o Maintain vegetated buffers of at least 100m with all waterbodies wherever practical;</li><li>o All equipment must be inspected prior to use on-site to ensure that they are clean and free of soil or other contaminants;</li><li>o Maintain spill kits on all vehicles used on-site;</li><li>o All machinery will be kept in good working order and inspected regularly for drips, leaks, and spills;</li><li>o In the event of a spill, Denison will take all necessary actions, where it is safe to do so, to immediately stop the spill, contain contaminants, clean up and dispose of contaminated materials;</li><li>o Denison will maintain a record of all spills and report upon each spill within 48 hours, including information on spill response, cleanup, and remediation;</li><li>o Vehicle refueling will occur at a distance of at least 100m;</li><li>o Fuel tanks will be located in areas that are lined and contained;</li><li>o Fuel tanks will be located at least 500m from known waterbodies.</li></ul> <p><b>BNDN Comment January 16, 2024</b></p> <p>BNDN Position: Addressed.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #52)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison acknowledges the input and will consider the suggestions as the project moves forward. The draft EIS contains a number of mitigations referenced in different biophysical and human environment assessments; these mitigations together form Denison's fulsome commitment list of Project mitigation measures moving forward. Many of the proposed additional mitigation measures are already included in the draft EIS. A few examples are provided here: - Section 2.2.7.6: No fuels, oils, or other hazardous substances will be stored within 100 m of any water body. No equipment maintenance or re-fuelling will be conducted within 100 m of a water body.</p> <p>- Section 2.8: Fuel storage and distribution infrastructure will be constructed in accordance with applicable legislation requirements; Fuels will be stored in approved, above-ground, double-walled storage tank(s) equipped with secondary containment in accordance with provincial regulations and standards; Stationary and mobile equipment will be fueled with a fuel-dispensing truck.</p> <p>- Section 9.2.5.2.7: Standard operating procedures will be employed, and regular inspections of equipment and machinery will be completed to verify they are in good working order; Vehicles and equipment will be maintained in good working condition (e.g., no leaks) and furnished with industry-standard spill response kits.</p> <p>Denison also notes that Section 2.9.1.3 of the draft EIS provides Denison's commitment to develop an Environmental Management System, which includes an Emergency Preparedness and Response Program (EPRP) and an Environmental Protection Program (EPP; including an Environmental Monitoring Plan). The EPRP would be established to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The EPRP would be developed in a manner that aligns with</p>	Section 2.9.1.3 of the draft EIS provides Denison's commitment to develop an Environmental Management System. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process.	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b>		<p>guidance provided by CNSC in REGDOC-2.10.1. The EPP would be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets that Denison may set. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. A such, the details of these programs and plans will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the current stage of the Project approvals process.</p> <p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>				
Birch Narrows Dene Nation	Other	<b>BNDN Comment February 28, 2023</b> The collection of sediment samples was completed using cores and grab petit Ponar in three upstream reference locations (LA-7A, LA-8, and LA-9), Whitefish Lake (LA-5 and LA-6), McGowan Lake (LA-1), and Russell Lake (LAB-1 and LAB-2). Sediment quality testing was conducted to characterize COPC including nutrients, metals, and radionuclides. Only the top 2 cm of cores of grab samples were analyzed in the lab. It is not clear in the methodology why laboratory analysis was limited to the top 2 cm. Request/recommendation: -BNDN requests additional information on the rational for only analyzing COPC within the top 2 cm of sediment samples. This should include information on whether this limited data will negatively affect the ability to evaluate potential impacts of groundwater	BNDN Public Comment February 28, 2023 (BNDN Public Comment #54)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  Baseline sediment chemistry was conducted on the 0-2cm horizon as this is the area in contact with surface water and the zone inhabited by benthic invertebrates. It is also the sediment layer in which changes in sediment chemistry would be expected to change in response to Project-related inputs and thus provides the most appropriate data for comparison to follow-up monitoring.  As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process.	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>contamination entering Whitefish Lake from below during operations, decommissioning, and future centuries.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>		<p>would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time.</p> <p>BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p> <p>The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Despite significant concerns regarding the presence of mercury in water and sediment, the Proponent has elected not to test sediments for it. BNDN acknowledges that the mining process does not use mercury and it is present in low levels in the background environment. However, for the purposes of good stewardship, communications, and trust, having an assessment of the background levels of mercury is important to BNDN. Request/recommendation: -BNDN requests that the proponent sample sediments for mercury to establish background levels. This is information that is culturally important given the potential harm and the psychological toll of mercury in aquatic ecosystems. Background levels can then be compared with ongoing monitoring throughout the life of mine.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #55)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison will collect background information pertaining to sediment total and methyl mercury from LSA lakes and rivers prior to site development.</p>	Denison will collect background information pertaining to sediment total and methyl mercury from LSA lakes and rivers prior to site development (Section 8).	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b> .						
Birch Narrows Dene Nation	Other	<b>BNDN Comment February 28, 2023</b> In Section 8.5 Fish Health, the Proponent has included a summary table with information on contaminants in fish tissue and bone tissue. The information provided does not include total number of samples. Request/recommendation: -BNDN requests table 8.5-2 be updated with information on total number of fish (n) samples for each location.  <b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.  <b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b> – the information is found in Table 3-10 of Appendix 8-D.	BNDN Public Comment February 28, 2023 (BNDN Public Comment #56)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  The requested information is presented in Appendix 8-D in the draft EIS.	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.
Birch Narrows Dene Nation	Other	<b>BNDN Comment February 28, 2023</b> Incidental observations of Barn Swallow ( <i>Hirundo rustica</i> ) occurred during baseline studies (Appendix 9-B). This bird SAR was not included as a Key Indicator for this Valued Component. Instead, the EIS represents the Barn Swallow using two other SAR birds including the Olive-sided Flycatcher ( <i>Contopus cooperi</i> ), and Common Nighthawk ( <i>Chordeiles minor</i> ). This does not make ecological sense because Barn Swallows use distinct habitat and exhibit distinct breeding behaviour from these other SAR. Therefore, the barn swallow should be its own key indicator because it will have unique levels of habitat alteration/loss and levels of mortality than the other species. In addition, Barn Swallows have a higher likelihood of being impacted by project activities than the other representative SAR, because they nest directly on artificial structures. The EIS states that species that nest on buildings are more susceptible to entrapment in Project components. This species is listed as Threatened on SARA Schedule 1. In Canada, the Migratory Birds Convention Act, 1994 protects Barn Swallow, its nests, and eggs. Request/recommendation: a) BNDN requests that the Barn Swallow is included as its own key indicator for the VC Bird SAR within the	BNDN Public Comment February 28, 2023 (BNDN Public Comment #61)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. The methodology for the habitat-based assessment appropriately evaluated potential adverse effects on avian species using the accepted VC and KI approach for focus of the assessment. As described in the EIS, the Common Nighthawk (similar to the Barn Swallow) is an aerial insectivore that uses a variety of habitats, including anthropogenically disturbed and cleared areas (Section 9.4.3.3.1). As such, effects on these anthropogenically disturbed areas were appropriately assessed in the habitat-based EA methodology. Since Barn Swallows nest almost exclusively on human-made structures, specific Barn Swallow exclusion methods will be added as mitigation measures to the EIS (Section 9.4.5). If Barn Swallow nests should be encountered, any subsequent activities would be conducted in accordance with the 2022 Migratory Birds Regulations. The habitat-based approach for the assessment supports the use of surrogates that are known to utilize the same habitat types. Habitat loss and alteration were assessed for the Key Indicator species included in this Valued Component. A conservative approach of identifying available habitat for these species was chosen to include habitat for those species not directly assessed (i.e., Barn Swallow through Common Nighthawk habitat).	Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been included as to Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS.	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>EIS.</p> <p>b) Additional surveys should be conducted to confirm the presence of any Barn Swallow nests on all buildings in the Project Area prior to commencement of construction.</p> <p>c) If Barn Swallow nests are located, contact the SK MOE for regulatory advice on the appropriate actions given the specific situation.</p> <p>d) The Proponent should monitor all barn swallow nests found within the Project Area to confirm their continued usage throughout the lifecycle of the mine. If avoidance of nests is observed near Project activities, the Proponent should adopt an adaptive management approach and provide additional nesting sites elsewhere. Specifically, the Proponent could consider installing nesting structures in suitable areas to provide alternative nesting options for Barn Swallows.</p> <p>e) Staff should be trained to identify and report barn swallows and their nests.</p> <p>f) Future monitoring programs during the life of the project must include the barn swallow.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b>.</p>		<p>Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as to Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on barn swallow.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Incidental observations of Horned Grebe (<i>Podiceps auratus</i>) occurred during baseline studies (Appendix 9- B). This species is listed as Special Concern on SARA Schedule 1. The Horned Grebe was not included as a Key Indicator for this Valued Component. Instead, the EIS represents this species with two other bird SAR, Yellow Rail (<i>Coturnicops noveboracensis</i>), and Rusty Blackbird (<i>Euphagus carolinus</i>). The Horned Grebe uses distinct habitat from these other species. Therefore, the Horned Grebe should be its own key indicator because it will have different levels of habitat alteration/loss and levels of mortality. Request/recommendation: a) BNDN requests that the Horned Grebe is included as its own Key Indicator for the VC Bird SAR within the EIS.</p>	<p>BNDN Public Comment February 28, 2023 (BNDN Public Comment #62)</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. While Horned Grebe was not included as an avian SAR in the draft EIS, the EIS identified Yellow Rail and Rusty Blackbird as a surrogate species. To focus the effects assessment on key species, it was decided to use the provincially listed Yellow Rail (and Rusty Blackbird) as surrogates for Horned Grebe. Horned Grebe use similar wetland habitat types for nesting, foraging and protective cover as Yellow Rail. The habitat-based approach for the assessment supports the use of surrogates that are known to utilize the same habitat types. Habitat loss and alteration were assessed for the Key Indicator species included in this Valued Component. A conservative approach of identifying available</p>	<p>Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been included as to Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward a resolution on these issues.</p>

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>b) Future monitoring programs during the life of the Project must include the Horned Grebe.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>The Horned Grebe and Yellow Rail exhibit some similar yet distinct habitat characteristics. While both species rely on wetlands with emergent vegetation, their specific habitat requirements differ significantly. The Horned Grebe is dependent on aquatic habitats year-round, requiring deeper wetlands with open water. It nests along the margins of ponds and marshes, anchoring its floating nest to emergent vegetation (Kuczynski et al., 2012). In contrast, the Yellow Rail prefers shallowly flooded wetlands dominated by dense grasses or sedges. These areas typically have minimal open water and provide the thick ground cover necessary for concealment (Austin &amp; Buhl, 2013). Given these ecological differences, the Horned Grebe should be assessed as its own Key Indicator within the EIS to ensure that its specific habitat needs and potential project-related effects are properly accounted for. Additionally, future monitoring programs must include the Horned Grebe to adequately assess its population trends and response to development activities. Kuczynski, E. C., Paszkowski, C. A., &amp; Gingras, B. A. (2012). Horned grebe habitat use of constructed wetlands in Alberta, Canada. The Journal of Wildlife Management, 76(8), 1694–1702. doi:10.1002/jwmg.421 Austin, J. E., &amp; Buhl, D. A. (2013). Relating Yellow Rail (Coturnicops noveboracensis) occupancy to habitat and landscape features in the context of fire. Waterbirds, 36(2), 199-213. <a href="https://doi.org/10.1675/063.036.0209">https://doi.org/10.1675/063.036.0209</a></p>		<p>habitat for these species was chosen to include habitat for those species not directly assessed (i.e., Horned Grebe through Yellow Rail and Rusty Blackbird habitat). As such, potential effects on these habitat types were assessed appropriately in the draft EIS.</p> <p>Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as Attachment to IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on Horned Grebe.</p> <p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p>	<p>community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p>			
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Bank Swallow (Riparia riparia), a bird SAR may be present within the terrestrial RSA. This species was not included in the EIS as a key indicator for bird SAR.</p>	<p>BNDN Public Comment February 28, 2023 (BNDN</p>	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p>	<p>Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D) will be</p>	<p>Ongoing - Denison is committed to working toward</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward</p>

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>This species is listed as Threatened on SARA Schedule 1.</p> <p>The breeding range of the Bank Swallow (Riparia riparia) overlaps with the terrestrial RSA. Bank swallows breed in varying natural and artificial habitat with sand-silt substrates including vertical banks, riverbanks, bluffs, stockpiles, aggregate pits, and roadcuts (COSEWIC 2013). Suitable habitat may be present because soil surface textures across the RSA are predominantly sand textured (sand, loam sand/sandy loam and silty sand). The creation of soil stockpiles during construction may create suitable breeding habitat for this species.</p> <p>Request/recommendation:</p> <p>a) BNDN requests a justification for excluding the Bank Swallow from the EIS.</p> <p>b) If a valid justification does not exist, BNDN requests this species be added as a Key Indicator for bird SAR unless it can be proven not present in the RSA.</p> <p>c) All soil stockpiles should be monitored for Bank Swallow nesting activity before the stockpiles are disturbed when needed for site reclamation.</p> <p>d) If Bank Swallow nests are located, contact the SK MOE for regulatory advice on the appropriate actions given the specific situation.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Provisionally Addressed.</b></p> <p>Mitigation measures in Appendix 9-D should include monitoring of potential nesting sites, particularly soil stockpiles, before disturbance. If active nests are found, appropriate avoidance measures should be implemented, and consultation with Saskatchewan Ministry of Environment (SK MOE) should be required to determine regulatory actions.</p>	Public Comment #63)	<p>The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as Attachment to IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bank swallow.</p>	<p>added to Section 9 of the final EIS. It has been included as to Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS.</p>	<p>reaching a resolution on these issues.</p>		<p>a resolution on these issues.</p>
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>The EIS states that knowledge providers reported that multiple Whooping Cranes (Grus americana) have been observed along the Wheeler River, Moore River, and along the Cree River (outside of the</p>	BNDN Public Comment February 28, 2023 (BNDN Public	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory</p>	<p>Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been</p>	<p>Ongoing - Denison is committed to working toward reaching a</p>	<p>As per letter received May 26, 2025</p>	<p>Discussions continue with BNDN about working toward</p>

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>terrestrial RSA) (19-LK-ERFNTrip- 134.169) (19-LK-ERFNTrip-134.170). Whooping Cranes are listed as Endangered on SARA Schedule 1. The EIS does not include this species as a key indicator for SAR birds, nor does it include an explanation why this species was omitted despite being reported by a knowledge provider from English River First Nation.</p> <p>Request/recommendation:</p> <p>a) BNDN requests an explanation for excluding this species despite being reported by a Trapper from English River First Nation. If a valid justification does not exist, the species Whooping Crane (<i>Grus americana</i>), should be included as a key indicator for SAR birds.</p> <p>b) Future monitoring programs during the life of the Project must include surveys for the Whooping Crane.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Provisionally Addressed.</b></p> <p>The proponent should confirm whether the reference to Bank Swallow was a typo and clarify that the response is intended to address Whooping Crane. The response refers to residual effects, mitigation measures, and project effects for Bank Swallow instead of Whooping Crane, which does not address the original comment.</p>	Comment #64)	<p>Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. The local trapper's observation of Whooping Crane was outside of the avian RSA. The rationale for the selection of the SAR Key Indicators was provided in draft EIS Section 9.4.1. For these reasons, Whooping Crane was not included as a SAR Key Indicator in the draft EIS. for further reference as noted above subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as Attachment to IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bank swallow.</p> <p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p>	included as to Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.	resolution on these issues.		a resolution on these issues.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Short-eared Owls (<i>Asio flammeus</i>) were not observed during the baseline surveys (Appendix 9-B). This is likely because targeted surveys for this species were not conducted. The detection probability of Short-eared Owls is very low at sunrise when the breeding songbird point count surveys were conducted. Short-eared Owls are most detectable from one hour before sunset to half an hour after sunset.</p> <p>Request/recommendation:</p> <p>a) BNDN requests that short-eared Owls continue to be assumed present within suitable habitat, unless proven otherwise by a qualified biologist using the Short-Eared Owl Survey Protocol (Saskatchewan</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #65)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. Short-eared Owl were included as a KI of the Bird SAR VC in the EIS. A review of life history requirements and discussion on effects assessment are included in the EIS (Section 9.3). In the EIS, Short-eared Owl were assumed to be present and breeding in the Project study areas. As described in the EIS, pre-construction surveys will be conducted prior to the commencement of any vegetation clearing or soil disturbance. Avian species will also be routinely monitored throughout</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>Ministry of Environment 2015).</p> <p>b) Future monitoring programs should utilize the protocol developed by the Saskatchewan Ministry of Environment to better (2015) understand whether this species is present.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b>.</p>		the life of the Project. Results from the surveys and monitoring activities are expected to inform the adaptive management process to update Project design and identify the need for additional mitigation measures, if required.				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Yellow Rail (<i>Coturnicops noveboracensis</i>) were not observed during the baseline surveys (Appendix 9-B). This is likely because targeted surveys for this species were not conducted. The Yellow Rail is nocturnal; therefore, survey effort must take place between 23:00-3:00. Therefore, this species would not have been observed when the breeding songbird point count surveys were conducted. Request/recommendation: a) BNDN requests that Yellow Rail should continue to be assumed present within suitable habitat, unless proven otherwise by a qualified biologist using the Yellow Rail Survey Protocol (Saskatchewan Ministry of Environment 2014). b) Future monitoring programs should utilize the protocol developed by the Saskatchewan Ministry of Environment (2014) to better understand whether this species is present.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b>.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #66)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. Yellow Rail were included as a KI of the Bird SAR VC in the EIS. A review of life history requirements and discussion on effects assessment are included in the EIS (Section 9.3). In the EIS, Yellow Rail were assumed to be present and breeding in the Project study areas. As described in the EIS, pre-construction surveys will be conducted prior to the commencement of any vegetation clearing or soil disturbance. Avian species will also be routinely monitored throughout the life of the Project. Results from the surveys and monitoring activities are expected to inform the adaptive management process to update Project design and identify the need for additional mitigation measures, if required.</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Two bat species, Little Brown Bat (<i>Myotis lucifugus</i>) and Northern Myotis (<i>Myotis septentrionalis</i>) were detected during passive acoustic surveys in 2019 (Appendix 9- b). These species are listed as Endangered by COSEWIC and SARA schedule. Despite</p>	BNDN Public Comment February 28, 2023 (BNDN Public	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS and has been included in the response to YNLR (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been</p>	Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been included as to Attachment IR-131. This new EIS	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project,



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>being present, bats were completely excluded from the EIS. Areas that will be cleared for mine development and operations could contain maternity roost trees. Based on Appendix 9-b, this habitat was not adequately evaluated through field surveys. Request/recommendation:</p> <p>a) BNDN requests justification for excluding bat species from the EIS despite two Endangered species confirmed present.</p> <p>b) BNDN also request the Proponent put protocols in place to identify and assess bat maternity roost trees prior to clearing and employ mitigation measures such as retaining maternity roost trees, modifying the timing of clearing, and offsetting for the destruction of habitat for endangered species.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	Comment #67)	<p>included here as Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bats.</p>	<p>appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS.</p>			<p>and will be responsive to BNDN’s future interests in the Project.</p>
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Project is predicted to produce exceedances for TSP of 313% over the regulatory limit. 24-hour TSP concentrations exceed the criterion 28% of the time during Construction, 21% of the time during Operations. These exceedance conditions do not include TSP emissions from Cameco’s McArthur River Mine and Key Lake Mill which have now resumed operations. There is also the potential for wildfire smoke to further exacerbate dust emissions. TSP exceedances represent a potential health risk for land users and workers near the Project site. Especially for at-risk groups such as elders, youth, and people with existing respiratory conditions. Request/recommendation:</p> <p>a) Denison must employ additional mitigation measures to reduce TSP emissions on site including enhanced dust suppression efforts.</p> <p>b) Denison must remodel TSP to include emissions from Cameco’s McArthur River Mine and Key Lake Mill.</p> <p>c) Please provide information on how TSP will be monitored during the Project and how Denison will know when exceedance conditions are occurring.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #71)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) A change in a measurable parameter is not a significant effect, per the EA methodology outlined in Section 5. This threshold approach is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue. Denison directs BNDN to Table 6.1-19 to 6.1-21 for the complete residual effect characterization for TSP exceedances. This includes a consideration of the residual effect related to TSP in the full context of direction, magnitude, geographic extent, duration, frequency, reversibility, context, and likelihood. In Section 10.1 of the draft EIS, the SMEs concluded that while there were predicted exceedances of air quality criteria for particulate matter, they were not identified for further assessment in the HHRA—these COPCs are unlikely to be associated with a human health or environmental risk, and any exposures to people at elevated concentrations would be infrequent, short-term, and highly localized.</p> <p>b) Please refer to Section 6.1.3.2. The regional SK MOE data presented in Table 6.1-12 were conservatively used to represent background concentrations of TSP, PM10, PM2.5, CO, SO2, and NO2 for the Wheeler River Project air quality assessment. While traffic associated with Cameco Operations was not modelled, conservative regional background</p>	<p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process.</p>	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



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		<p>d) Please provide information on how adaptive management will be used when a TSP exceedance is discovered. Including discussion on how the Project will be managed during poor air quality events caused by wildfire smoke.</p> <p>e) Please provide information on how exceedances conditions near the Project site will be communicated to the public.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not addressed.</b></p> <p>Denison makes no commitment to reduce potential TSP exceedances related to the Project. Denison does not commit to collaborating with BNDN in the design and implementation of air quality monitoring. Denison only commits to informing BNDN which is totally unacceptable. Denison does not specify how it will notify BNDN of project-related air quality exceedances. Denison mischaracterizes BNDN as not being part of “Indigenous Communities of Interest with reserves and residential communities most proximal to the Project”. BNDN is located closer (232 km) to the Project than Kineepik Métis Local (235 km). Further, the Project is located on BNDN’s Treaty Lands (Treaty 10), whereas Kineepik Métis Local has no Treaty lands or Treaty rights. As such, BNDN must be treated as a Indigenous Community of Interest with reserves and residential communities most proximal to the Project, not as some secondary community. Denison’s position of BNDN requiring consultation and accommodation that is less meaningful than KML is unacceptable and wrong.</p>		<p>concentrations from the Saskatchewan Air Quality Modelling Guideline (SK MOE 2012a) and the La Loche monitoring station were used for particulate matter, NO2, SO2, and CO (see Section 6.1.3.2.5 and Appendix 6-A). The La Loche monitoring station is located near anthropogenic sources, while the Project is in a remote area removed from anthropogenic sources. Accordingly, emissions to air from traffic associated with Cameco’s operations are captured by the regional background concentrations used in the air dispersion model and are considered in the assessment of Project-related effects discussed in Section 6.1.4. Model predictions of COPC concentrations and depositions were added to background levels and compared to the available standards summarized in Table 6.1-5 at receptors located outside the property boundary.</p> <p>c) and d) To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial ambient air quality standards, an adaptive air quality management program will be implemented. The air quality management program will contain various plans which will be finalized during permitting and licensing. The plans within the air quality management program will incorporate monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested. In terms of worker health and safety while forest fire smoke is present, Denison will consider this through the Occupational Health and Safety Program. Information on how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property related to forest fires will be included in the Emergency Preparedness and Response Program.</p> <p>e) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>				

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>The Project is predicted to produce exceedances for PM10 of 232% over the regulatory limit. 24- hour PM10 concentrations exceed the criterion 17% of the time during Construction, 12% of the time during Operations.</p> <p>These exceedance conditions do not include PM10 emissions from Cameco’s McArthur River Mine and Key Lake Mill which have now resumed operations. There is also the potential for wildfire smoke to further exacerbate dust emissions.</p> <p>PM10 exceedances represent a potential health risk for land users and workers near the Project site. Especially for at-risk groups such as elders, youth, and people with existing respiratory conditions.</p> <p>Request/recommendation:</p> <p>a) Denison must employ additional mitigation measures to reduce PM10 emissions on site including enhanced dust suppression efforts.</p> <p>b) Denison must remodel PM10 to include emissions from Cameco’s McArthur River Mine and Key Lake Mill.</p> <p>c) Please provide information on how PM10 will be monitored during the Project and how Denison will know when exceedance conditions are occurring.</p> <p>d) Please provide information on how adaptive management will be used when a PM10 exceedance is discovered. Including discussion on how the Project will be managed during poor air quality events caused by wildfire smoke.</p> <p>e) Please provide information on how exceedances conditions near the Project site will be communicated to the public.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN disagrees with Denison’s assessment and that particulate exceedances will not have an impact on human health or the environment. Regulatory standards are in place for a reason (to protect human health and the environment) and if Denison cannot</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #72)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>a) A change in a measurable parameter is not a significant effect, per the EA methodology outlined in Section 5. This threshold approach is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue. Denison directs BNDN to Table 6.1-22 and 6.1-23 for the complete residual effect characterization for PM10 exceedances. This includes a consideration of the residual effect related to PM10 in the full context of direction, magnitude, geographic extent, duration, frequency, reversibility, context, and likelihood. In Section 10.1 of the draft EIS, the SMEs concluded that while there were predicted exceedances of air quality criteria for particulate matter, they were not identified for further assessment in the HHRA—these COPCs are unlikely to be associated with a human health or environmental risk, and any exposures to people at elevated concentrations would be infrequent, short-term, and highly localized.</p> <p>b) Please refer to Section 6.1.3.2. The regional SK MOE data presented in Table 6.1-12 were conservatively used to represent background concentrations of TSP, PM10, PM2.5, CO, SO2, and NO2 for the Wheeler River Project air quality assessment. While traffic associated with Cameco Operations was not modelled, conservative regional background concentrations from the Saskatchewan Air Quality Modelling Guideline (SK MOE 2012a) and the La Loche monitoring station were used for particulate matter, NO2, SO2, and CO (see Section 6.1.3.2.5 and Appendix 6-A). The La Loche monitoring station is located near anthropogenic sources, while the Project is in a remote area removed from anthropogenic sources. Accordingly, emissions to air from traffic associated with Cameco’s operations are captured by the regional background concentrations used in the air dispersion model and are considered in the assessment of Project-related effects discussed in Section 6.1.4. Model predictions of COPC concentrations and depositions were added to background levels and compared to the available standards summarized in Table 6.1-5 at receptors located outside the property boundary.</p> <p>c) and d) To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial ambient air quality standards, an adaptive air quality management program will be implemented. The air quality management program will contain various plans which will be finalized during permitting and licensing. The plans within the air quality management program will incorporate monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested. In terms of worker health and safety while forest fire smoke is present, Denison will consider this through the Occupational Health and Safety Program. Information on how the Project will prepare for and addresses emergencies that may affect the health and</p>	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		meet these standards they should not be constructing or operating. Denison mischaracterizes BNDN as not being part of “Indigenous Communities of Interest with reserves and residential communities most proximal to the Project”. BNDN is located closer (232 km) to the Project than Kineepik Métis Local (235 km). Further, the Project is located on BNDN’s Treaty Lands (Treaty 10), whereas Kineepik Métis Local has no Treaty lands or Treaty rights. As such, BNDN must be treated as a Indigenous Community of Interest with reserves and residential communities most proximal to the Project, not as some secondary community. Denison’s position of BNDN requiring consultation and accommodation that is less meaningful than KML is unacceptable and wrong.		safety of persons, the environment, and the protection of property related to forest fires will be included in the Emergency Preparedness and Response Program.  e) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.				
Birch Narrows Dene Nation	Other	BNDN Comment February 28, 2023 The Project is predicted to produce exceedances for uranium of 148% over of the regulatory limit. These exceedance conditions do not include uranium emissions from Cameco’s McArthur River Mine and Key Lake Mill which have now resumed operations. Uranium exceedances represent a potential health risk for land users and workers near the Project site. Additionally, uranium deposition in the aquatic and terrestrial environment can cause effect pathways to humans through the food chain through the consumption of edible/medicinal plants, berries, fish, and wildlife. Request/recommendation: a) Denison must employ additional mitigation measures to reduce uranium emissions on site including enhanced scrubber systems and containment measures. b) Denison must remodel uranium to include emissions from Cameco’s McArthur River Mine and Key Lake Mill. c) Please provide information on how uranium emissions will be monitored during the Project and how Denison will know when exceedance conditions are occurring. d) Please provide information on how adaptive	BNDN Public Comment February 28, 2023 (BNDN Public Comment #73)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  a) A change in a measurable parameter is not a significant effect, per the EA methodology outlined in Section 5. This threshold approach is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue. Denison directs BNDN to Table 6.1-27: Air Quality – Summary of the Characteristics Ratings for Residual Effect 9 (Operation, 24-hour Uranium Exceedances) for the complete residual effect characterization. This includes a consideration of the residual effect (24-hour U exceedance during operation) in the full context of direction, magnitude, geographic extent, duration, frequency, reversibility, context, and likelihood. Further, in Section 10.1 of the draft EIS, all relevant radionuclides were assessed in the HHRA in terms of their contribution to the total radiological dose to human and ecological receptors and COPCs identified for air were radionuclides (U-238, U-234 and radon); refer to Table 10.1-7 for a summary of human health exposure pathways. The HHRA estimated dose and risk during all Project phases to the following receptors: camp worker, seasonal resident, recreational fisher/hunter, fisher/trapper. The incremental radiation dose to all human receptors during all Project phases is predicted to be below the regulatory public dose limit of 1 mSv/yr and the dose constraint of 0.3 mSv/yr during all Project phases. Overall, since the radiation dose estimates would be below the public dose limit, no discernable health effects are anticipated	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>management will be used when a uranium exceedance is discovered.</p> <p>e) Please provide information on how exceedance conditions near the Project site will be communicated to the public.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN disagrees with Denison’s assessment and that uranium exceedances will not have an impact on human health or the environment. Regulatory standards are in place for a reason (to protect human health and the environment) and if Denison cannot meet these standards they should not be constructing or operating.</p> <p>Denison mischaracterizes BNDN as not being part of “Indigenous Communities of Interest with reserves and residential communities most proximal to the Project”. BNDN is located closer (232 km) to the Project than Kineepik Métis Local (235 km). Further, the Project is located on BNDN’s Treaty Lands (Treaty 10), whereas Kineepik Métis Local has no Treaty lands or Treaty rights. As such, BNDN must be treated as a Indigenous Community of Interest with reserves and residential communities most proximal to the Project, not as some secondary community. Denison’s position of BNDN requiring consultation and accommodation that is less meaningful than KML is unacceptable and wrong.</p>		<p>due to exposure of these receptors to radioactive releases from the Project.</p> <p>b) Please refer to Section 6.1.3.2. The Key Lake data from camp high volume air samplers from 2009 to 2018 (Table 6.1-13) were selected to represent background concentrations of uranium, arsenic, and nickel for the Wheeler River Project air quality assessment. Model predictions of COPC concentrations and depositions were added to background levels and compared to ambient air quality standards and criteria.</p> <p>c) and d) To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial ambient air quality standards, an adaptive air quality management program will be implemented. The air quality management program will contain various plans which will be finalized during permitting and licensing. The plans within the air quality management program will incorporate monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested.</p> <p>e) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Saskatchewan MOE Air Quality Modelling Guidelines specifies that the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) should be used for assessments in Saskatchewan. Denison opted to use the CLAMET/CALPUFF dispersion model for the EIS. Request/recommendation: Please provide additional rationale for the selection of the CALPUFF model over the provincially recommended AERMOD.</p> <p><b>BNDN Comment January 16, 2024</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #74)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>As described in Section B.1 of Appendix 6-A, staff at the Saskatchewan Ministry of Environment (Air Quality Branch) were consulted on the selection of CALPUFF and development of the CALMET meteorological data set, beginning in 2019. The CALMET consultation included an initial discussion about the general approach, and once the CALMET runs were completed, two technical memos were produced and reviewed by Ministry staff including: 1) a memo completed in March 2020 summarizing the general CALMET approach and results (e.g., wind roses, temperature data, precipitation data); and 2) a follow-up memo completed in May 2021,</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>		<p>which answered specific questions posed by Ministry staff. Ministry staff also completed a review and provided feedback on the CALPUFF model setup in August 2021. The specific rationale for the use of CALPUFF in lieu of AEROMOD as documented in the March 2020 memo was as follows: the domain size needed to generate inputs for the human health and ecological risk assessment (HHERA) is estimated to be 60 km by 60 km. The Saskatchewan Air Modelling Guide recommends CALPUFF for long-range transport (i.e., &gt; 50 km); CALPUFF includes wet and dry removal processes and chemical transformation algorithms that are needed to generate inputs for the HHERA and the terrestrial and aquatic assessments; and, the approach is consistent with other uranium mines in the area.</p>				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Carbon dioxide emissions related to air travel for Project personnel were not included in the GHG emissions calculations. Project related emissions from air travel would be significant source due to the remote nature of the site. The GHG emission estimate included in EIS Appendix 6-C does not provide a fulsome representation of Project related GHG emissions. Request/recommendation: Denison must include emissions from air travel for project personnel in the GHG emissions calculations. This will provide a more accurate representation of project- related GHG emissions.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #75)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Assessment of upstream or Scope 3 GHGs under Environment and Climate Change Canada's Strategic Assessment of Climate Change guide are only required for projects that are likely to exceed the upstream threshold of 500 kt of CO<sub>2</sub>e per year. The upstream GHG emissions for the Project are expected to be well below this threshold (draft EIS Section 2.5) and in the range of 25 to 31 kt of CO<sub>2</sub>e.</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Denison acknowledges the Project's contribution to climate change through GHG emissions but does not outline a plan to offset GHG emissions. Other mines in Canada, including the Canadian Malartic Mine in Quebec have GHG offset plans in which carbon emissions are tracked and offsetting activities are developed in collaboration with local First Nations (Canadian Malartic, 2014). Request/recommendation: Denison must develop a GHG/Carbon offsetting plan to mitigate potential impacts of the Project to climate change. Denison could work with BNDN and other local First Nations</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #76)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b> Denison anticipates being subject to ECCC's reporting requirements for emitters over 10,000 tonnes CO<sub>2</sub>e and the information is collected under section 26 of the Canadian Environmental Protection Act. In order to meet these reporting requirement, Denison will be tracking Scope 1 and 2 GHG emissions. Options to offset the Project's GHG emissions will be considered as the Project advances. In draft EIS Section 2.5 Greenhouse Gas Emissions Denison has committed to looking for opportunities to optimize energy management and improve the energy intensity of the Project where practical.</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>on initiatives that help to offset the Project’s GHG emissions (e.g. tree planting, wetland restoration, carbon offsets). This would demonstrate a commitment to corporate social responsibility, climate stewardship and reconciliation on Denison’s behalf.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b>.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Project is reliant on burning diesel for construction, supplementary power generation, mine processing activities, and mine equipment. The GHG intensive nature of the Project’s construction and operation phases are a concern for BNDN and not consistent with federal or provincial directives to reduce GHGs. Cleaner technology and fuel sources are available to reduce the Project’s GHG emissions. For a project based around supplying fuel for the energy transition, a more progressive approach that utilizes Best Available Technology is required in order to reduce GHG emissions. Request/recommendation: -Where feasible Denison must implement the use of low carbon technology and fuels in the final Project design to reduce GHG emissions. Specifically, Denison should redesign the Project to:</p> <ul style="list-style-type: none"><li>o Replace all diesel electricity generation with LNG/CNG generators (and add in renewables where feasible) for construction phase</li><li>o Replace all diesel powered mine equipment and vehicles with electric or LNG/CNG models</li><li>o Use renewable energy sources for electricity generation (e.g. wind, solar) as early in the project lifecycle as possible.</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #77)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Thank you for the comment. The EIS is a planning tool and the details of Project design including use of fuels will be evaluated by Denison as the Project advances. However, we note that in Section 2.5 Greenhouse Gas Emissions of the draft EIS that Denison will look for opportunities to optimize energy management and improve the energy intensity of the Project where practical. In terms of EIS scoping for the basis of effects assessments, Denison took a conservative approach to estimating combustion products use by assuming back-up diesel generators were running continually (worst-case scenario). This is expected to bound actual Project fuel use.</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b>						
Birch Narrows Dene Nation	Other	<b>BNDN Comment February 28, 2023</b> Denison does not specify how it will monitor air contaminant concentrations during all phases of the Project. Continuous on-site ambient air monitoring for all COPCs (including particulates, metals, and radon) is the only way to truly assess the Project's impact on air quality and compliance with government standards. Request/recommendation: -Denison must conduct continuous on-site monitoring for all contaminants of concern (including particulates, metals, and radon) in order to assure regulatory compliance and verify the accuracy of air dispersion models and EIS predictions.  <b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.  <b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not addressed.</b>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #78)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial ambient air quality standards, an adaptive air quality management program will be implemented. The air quality management program will contain various plans which will be finalized during permitting and licensing. The plans within the air quality management program will incorporate monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested.	The plans within the air quality management program will incorporate monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested (Section 6.0)	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.
Birch Narrows Dene Nation	Other	<b>BNDN Comment February 28, 2023</b> The Proponent states that the UBS holding area will have leak detection (Figure 2.2-18). The system is shown as a pipe running under the pond. The Proponent states that the UBS holding area will have leak detection (Figure 2.2-18). The system is shown as a pipe running under the pond. Request/recommendation: a) BNDN requests more details on the leak detection system used for all ponds shown in Figure 2.2-18. b) BNDN requests that Denison respond to all the following questions in writing: <ul style="list-style-type: none"><li>Is the pipe connected to an automated sensing system?</li><li>If not, how frequently is the system monitored?</li><li>What chemical or physical indicator(s) are used to detect a leak?</li><li>What are the detection limits/thresholds for each indicator?</li><li>What is the precision of each indicator?</li><li>Who is notified, and how quickly would a</li></ul>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #80, #81)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  It is important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1). Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. The details requested by BNDN will be developed to support licensing and will be included in Management System programs / plans including for example the Groundwater Monitoring Plan and the Emergency Response and Preparedness Plan.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>response be mobilized?</p> <p>c) BNDN requests to know what specific containment/restoration methods will be used in the event that a leak is detected, and how quickly they would be implemented. This applies to both the UBS holding area and process precipitate pond.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>If Denison intends to defer the answering of these important questions to the licensing phase of the Project, BNDN requires a commitment to negotiate a Project Agreement to formalize a process for engagement with BNDN and responding to BNDN concerns on these matters. BNDN requires this commitment for this concern to be addressed.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent states that the wellfield pipelines will be designed to have secondary containment or catchment and have leak detection systems in place at key locations. BNDN requests more details on the leak detection system used for wellfield lines. Specifically, BNDN requests that Denison respond to the following questions:</p> <ul style="list-style-type: none"><li>- Is an automated sensing system used?</li><li>- Will automated controls shut off pressure in the event of a significant leak?</li><li>- If no automation is used, how frequently is the system monitored?</li><li>- What chemical or physical indicator(s) are used to detect a leak?</li><li>- What are the detection limits/thresholds for each indicator?</li><li>- What is the precision of each indicator?</li><li>- Who is notified, and how quickly would a response be mobilized?</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #83)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Wellfield piping system will transport the mining solution to and from the processing plant. The flow rates and pressures of the individual well lines will be monitored in the pumphouses. This data will be transmitted to the processing plant for remote monitoring through a master control system. Through the master control system, operators will be capable of controlling pumphouse production lines remotely. The specific details requested by BNDN in this comment are not available at this time and will be developed as part of detailed design to support Project licensing and permitting. Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. Denison views the EIS as an important planning tool that will be used to support future activities and represents one stage in the rigorous overall approvals process for a uranium mining facility in Canada. Denison completed feasibility designs for the Project in 2023. The engineering design of the wellfield pipelines including control measures to monitor and respond to leaks will be included in the detailed design information provided to the CNSC during Project licensing.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>If Denison intends to defer the answering of these important questions to the licensing phase of the Project, BNDN requires a commitment to negotiate a Project Agreement to formalize a process for engagement with BNDN and responding to BNDN concerns on these matters. BNDN requires this commitment for this concern to be addressed.</p>						
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent states that the well designs and operational monitoring of the wellfield will mitigate accidental release of mining solution or UBS in the sandstone above the mining area Request/recommendation: BNDN requests to know how Denison will monitor the integrity of wells once in production. Will tests be conducted at regular intervals?</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #84)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The well designs and operational monitoring of the wellfield will mitigate accidental release of mining solution or UBS in the sandstone above the mining area. Each well will have double containment: mining solution will travel inside an inner casing with the outer casing acting as secondary containment for the mining fluids. Wells will be continually monitored for operational parameters such as injection pressures, injection flow rates, and recovery flow rates. This data will be transmitted to the processing plant for remote monitoring through a master control system. Through the master control system, operators will be capable of controlling pumphouse production lines remotely. Wellfield monitoring will facilitate detection of any issues with the injection and recovery wells. A network of monitoring wells installed within the freeze wall area will be equipped with pressure instrumentation for the determination of the vertical strain/stresses placed on the formation to do mining zone space creation. This monitoring network is designed to detect if these strains may be approaching their acceptable levels prior to failure. The injection and recovery wells will also be equipped with devices for pressure and temperature that can detect a breach in the well casing if one were to occur. As a preventative measure, annual mechanical integrity testing is conducted on the wells to ensure their containment and compliancy. Active monitoring will allow for operational shutdown if a scenario is approaching a failure mode.</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent states that fuels will be stored in approved, above-ground, 25,000 L double-walled storage tank(s) equipped with secondary containment in accordance with provincial regulations and standards. Request/recommendation: BNDN requests to confirm when the permanent fuel storage facility will be constructed. If temporary fuel storage for construction is required, indicate how much, how it will be stored and dispensed, and show</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #85)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Details on when Denison will construct the permanent fuel storage facility or precisely where temporary fuel storage tanks will be located are not available at this phase of the Project and these details are not required to support EIS review. However, at the EIS stage it is important to note that Denison is committed to construction and operating all fuel storage and distribution infrastructure in accordance with applicable legislative requirements. Fuels will be stored in approved, above-ground, double-walled storage tank(s) equipped with secondary containment in</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>on a sketch where it will be located. Construction fuel requirements for site development may be significant.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>		<p>accordance with provincial regulations and standards. In Saskatchewan, the permitting process for hazardous substances including above ground storage tanks for diesel, propane, gas, and jet fuel are governed by The Hazardous Substances and Waste Dangerous Goods Regulations; Environmental Code Chapter E-10.2 Reg 3 (HSWDG). Denison will need to apply for an Approval to Construct, Install, Alter and Expand a Storage Facility and Store Hazardous Substances and/or Waste Dangerous Goods and secure an approval from the Ministry of Environment pursuant to The Environmental Management and Protection Act, 2010, and The Hazardous Substances and Waste Dangerous Goods Regulations. Denison will have to adhere to the Terms and Conditions of the approval, complete regular inspections of the facilities, and maintain an Emergency Response Contingency Plan. The Ministry of Environment staff also conduct regular inspections to ensure the conditions of the approval are being followed.</p>				interests in the Project.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent states that process precipitates may be stored in totes inside the process precipitate pond. Request/recommendation: BNDN requests details on the procedures for placement and handling of precipitate totes within the pond. Care should be taken to ensure that equipment and totes do not compromise the pond lining. Totes should be sealed and transport of totes from the plant to the pond should be carefully planned to minimize the risk of a spill, and in the event of a spill ensure that runoff is captured on the site.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #86)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The precipitate pond is proposed as a lined area with berms (as shown in Section 2, Figure 2.2-18) and may be more clearly described as being a lined pad. As such, process precipitates can be placed into totes, which can be placed on the lined area ('pond') for containment during storage. Details on the plans for precipitate management, placement and handling will be developed to support Project licensing and permitting. Denison agrees the integrity of the liner and totes are important considerations which will be factors in the plans. We also refer BNDN to the following draft EIS sections and comments responses: - Waste Management: Waste management is described in Section 2.2.4 of the draft EIS and includes discussion of all waste types that will be generated by Project-related activities. The following is noted in Section 2.2.4 for reference, "Conventional waste, radiologically contaminated waste, and hazardous waste will be managed at the Project. Denison is committed to conducting stringent waste characterization throughout the life of the Project. This includes physical, radiological, and chemical characterization to maintain accurate waste inventories and determine how wastes will be dispositioned through either re-use, recycling, temporary storage, or permanent disposal (on or off site). This includes clearance of material that meets unconditional release requirements and can be safely removed from site. A waste management program will be developed for the Project to support licensing and permitting. The waste management program and associated plans developed to support licensing will be based on the 4 R's: Reduce, Reuse, Recycle, and Recover, and will detail how each type of waste generated on site will be managed. Resources used to develop the waste management program will include, but are not limited to, the CNSC's REGDOC-2.11 series, related Canadian Standards Association (CSA) standards, and the Hazardous Substances and Waste Dangerous Goods Regulations (Government of Saskatchewan 2000)." - Water Management: Water management is described in Section 2.2.3 of the draft EIS and includes</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				Denison's commitment to capturing any contact water. Clean, non-contact runoff will be diverted around Project components where possible. Contact water, including, for example, runoff from the wellfield and around the processing plant, will be collected in various ponds and eventually routed through the IWWTP for treatment prior to release to Whitefish Lake. Refer to Figure 2.2-17 for runoff collection assumptions. - Emergency Preparedness and Response Program: Please also see Denison's response to BNDN comment 87 below for information on the Emergency Preparedness and Response Program.				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> Denison states that they will maintain an up-to-date record of the various hazardous substances on site and will maintain Safety Data Sheets and appropriate procedures for spill management, handling, and clean up in an accessible location. Request/recommendation: - BNDN requests a description of the safety and spill response training programs that employees will undergo. What is the duration of each training program and how often will retraining be conducted? - BNDN requests to know what resources will be kept on site for management and clean- up of spills, for example spill kits, absorbents, neutralization agents, vacuum trucks, PPE, hand tools, etc.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b>.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #87)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The details requested related to the Emergency Preparedness and Response Program are being developed to support licensing efforts. The EIS is a planning tool to provide an assessment of the potential Project effects on the human and biophysical environment; at the EIS stage a detailed Management System is not required.</p> <p>A brief description of the Emergency Preparedness and Response Plan is provided in the draft EIS, Section 2.9.1.3.5: and included below for reference. Please also refer to draft EIS, Section 14 Accidents and Malfunctions for an assessment of the potential accidents and malfunctions that could occur in association with the Project and a description of the potential effects on human health or the biophysical environment, considering environmental design features and mitigation measures that would be implemented to reduce such effects.</p> <p>2.9.1.3.5 Emergency Preparedness and Response Program</p> <p>The Emergency Preparedness and Response Program would identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The objectives of the program would include the following:</p> <ul style="list-style-type: none"><li>• identification of accidents and emergencies and the actions and responsibilities in the event of an emergency;</li><li>• Project requirements for emergency response equipment and personnel;</li><li>• internal incident command structure to effectively manage complex, lengthy, and large scale emergencies;</li><li>• required communications with external emergency services, statutory bodies, and public, Indigenous groups, and regulatory agencies;</li><li>• development of appropriate emergency procedures; and</li><li>• assurance of availability of vital information during an emergency.</li></ul>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				Emergency Preparedness and Response Program would be developed consistent with guidance provided by CNSC in REGDOC-2.10.1, Nuclear Emergency Preparedness and Response.				
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent describes various measures used to mitigate yellowcake dust emissions: the yellowcake drying and packaging area will be outfitted with hygiene systems to capture dust generated during the material handling of the yellowcake product and sent to either the dryer or calciner venturi scrubbers. All equipment located after the dewatering of the yellowcake will be selected to provide minimal dust generation and outfitted with dust collection systems where required. The ventilation system in this area of the processing plant will also be adequately designed to provide safety of workers and control fugitive dust emissions. Request/recommendation: BNDN recommends redundant hygiene systems be installed (n+1 units) to ensure continuity of air filtration in the event of equipment failure.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #88)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Should dust collection systems in the yellowcake drying and packaging area fail and generate a hazard for the workers, the plant will be shut down until repairs are completed. A redundant hygiene system is not economical to implement. Hygiene scrubbers are typically very reliable and can be repaired in short time frames.</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.
Birch Narrows Dene Nation	Other	<p><b>BNDN Comment February 28, 2023</b> The Proponent states that all contaminated areas will be fenced to avoid contact with workers and wildlife. Fences will be monitored and maintained. Request/recommendation: - BNDN requests to know the size and type of fence considered for each project area. - Confirm if the wellfields will be fenced. Show all fences on a site layout drawing like Figure 2.2-1.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #89)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Access to the property will be controlled by both a north and south security gate. In the draft EIS, Denison has committed to fencing the domestic landfill (Section 2.2.4.3.1) and having a fenced storage area near the operations centre. Details on the size and type of fencing are not defined at this stage of the Project, but will meet the criteria outlined in the EIS. The wellfield is not proposed to be fenced. For the wildlife-specific mitigation measures, refer to Section 9.3.5.2.5 Wildlife Deterrence and Prevention of Wildlife Entrapment and Section 9.3.5.2.8 Waste and Hazardous Materials Management.</p>	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN’s future interests in the Project.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Birch Narrows Dene Nation	Physical and cultural heritage; Current use of lands and resources for traditional purposes; Other	<p><b>BNDN Comment February 28, 2023</b></p> <p>Archaeology as a profession has been dominated in North America by non- Indigenous researchers, despite most sites being Indigenous in origin. It is positive that Golder Associates made efforts to engage and involve Indigenous communities (by including an ERFN representative in fieldwork and by considering ERFN and Pinehouse Kineepik Métis land use maps) in their 2017 heritage baseline study and 2020 heritage resource impact assessment. Notwithstanding, the proposed Project area is within BNDN’s treaty and ancestral lands and there may be heritage sites that the community is aware of. BNDN was not involved in either of these studies and BNDN may have Indigenous Knowledge of important heritage sites within the Study Area that should be considered. The archaeological context provided is very Western/Scientific. Denison must also include historical/pre-historical accounts of Indigenous communities to provide an appropriate and comprehensive assessment of the archaeological context of the region. Given the Ancestral and Treaty ties our members have to the project area, our members have valuable knowledge and context to inform the Heritage Resource Impact Assessment (HRIA) for the Project that must be considered prior to being reviewed or approved by any regulatory body.</p> <p>Request/recommendation:</p> <p>a) Denison should provide BNDN with funds to conduct a community-led Indigenous Knowledge, Land Use and Occupancy Study for consideration within the EIS process.</p> <p>b) The Heritage Resources Management Plan should be updated following the consideration of Indigenous Knowledge, Land Use and Occupancy provided by BNDN. This may result in the requirement for further assessment and/or mitigation measures, which should be developed in consultation with BNDN.</p> <p>c) Denison should facilitate BNDN involvement in any additional archaeological fieldwork that takes place, including providing BNDN with capacity funding for members who participate. Terms to facilitate BNDN involvement in future archaeological work should be a component of a broader process agreement between BNDN and Denison.</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #3, #7, #9)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date.</p> <p>Project effects have been mitigated for the most intensive resource user(s), irrespective of affiliation.</p> <p>Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. Therefore, Denison does not anticipate separate funding for BNDN at this time.</p> <p>Following the implementation of the mitigation measures outlined in the Heritage Resource Management Plan (HRMP), the likelihood of residual effects is considered low and residual effects on Heritage Resources will occur infrequently and can be mitigated with the HRMP. Known archaeological resources identified in the Project Area were deemed to have low potential for archaeological interpretation and additional work or mitigation measures were not required for the sites; the Heritage Conservation Branch had no further concerns with these sites and work could proceed as planned. Should unknown archaeological and cultural resources be identified during the Project, effects will be mitigated using the HRMP. While effects to archaeological resources are irreversible, they can be mitigated by following the HRMP, by either avoiding additional damage to the resource by creating a buffer zone around the site, or by assessing the resource according to The Heritage Property Act to enable the full interpretation of the site before continuing with work. Furthermore, based on the low occurrence of known Heritage Resources in the Project Area (two), and the location of the Heritage Resources (near waterbodies, along an existing trail and away from the main developments), there is a low potential for the identification or disturbance</p>	Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. Therefore, Denison does not anticipate separate funding for BNDN at this time. As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects, wherever possible.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		<p>d) Denison must include a write-up of Indigenous historical and prehistorical accounts in consultation with relevant Indigenous communities. This write up must include historic context provided through oral history interviews as part of BNDN’s community-led Indigenous Knowledge, Land Use and Occupancy Study for the Project.</p> <p>e) The draft HRIA should be reviewed by BNDN and other impacted Indigenous Nations prior to being submitted for regulatory approval.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>While the proponent has requested Indigenous Knowledge from BNDN, they have not made any resources available for BNDN to collect it, nor has the company engaged in any efforts to sign any agreements that provide assurances around confidentiality. BNDN lacks capacity and requires such resources and assurances to be able to provide Indigenous Knowledge; further, it is standard procedure for proponents to provide such financial capacity. Proposed mitigation measures for project effects are inadequate to BNDN and have been developed without consideration of BNDN land use and knowledge; the proponents’ suggestion that the mitigation measures are adequate for impacts to BNDN that have not been assessed is deficient. The project is located within BNDN’s treaty and ancestral lands where members have deep ancestral ties and continue to exercise rights to this day. Most archaeological material in Canada is Indigenous in origin; there is a significant chance that any archaeological material found on site derives from BNDN ancestors. BNDN has inherent rights to its cultural heritage, as affirmed by UNDRIP.</p> <p>I) BNDN requires capacity funding from the proponent to conduct a community-led and project-specific Indigenous Knowledge study so BNDN can evaluate the impacts the project will have on BNDN and so the results of the study may inform the project</p>		<p>of previously unknown archaeological sites throughout the life of the Project. Therefore, any residual effects (i.e., destruction of Heritage Resources) is considered to be negligible. Further, HRMP includes feedback from Indigenous nations with demonstrated significant land use activities in and around the Project.</p> <p>As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects, wherever possible.</p> <p>Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed.</p>				

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		and its evaluation. II) The Heritage Resources Management Plan should be updated following the consideration of BNDN's Indigenous Knowledge study. III) The proponent must engage with BNDN to discuss opportunities for BNDN to participate in archaeological work moving forward.						
Birch Narrows Dene Nation	Physical and cultural heritage; Other	<p><b>BNDN Comment February 28, 2023</b> The methodology within both the 2017 and 2020 heritage studies included 'judgmental' shovel probing and initial troweling through soil to identify cultural heritage material. While the discretion of a professional archaeologist needs to be taken into account, relying subjectively on which areas to shovel test and not employing a systematic approach is not reproducible and may result in sites being missed; this is of particular concern given that large sections of the areas retaining potential were not subject to shovel testing. Further, troweling through soil rather than subjecting all excavated soil to sifting through 6mm mesh means that artifacts/ecofacts may easily be overlooked. Given that the north of Saskatchewan has not been thoroughly investigated archaeologically, and given that 76 sites and nine find areas were recorded just 35 km south of the Project area as part of Dr. David Meyer's multi-year archaeological investigation, the results of these assessments do not seem rigorous. Request/recommendation: a) BNDN recommends that Denison undertake further archaeological investigations based on the results of the BNDN TKLU study prior to construction of the project. b) Future archaeological assessment programs should be designed collaboratively with BNDN and other Impacted Indigenous Nations.</p> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>BNDN will not retain confidence in the results of the heritage assessments until the nation is able to</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #4)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>The 2017 and 2020 heritage studies were reviewed by the Heritage Conservation Branch. The HRIA was completed using standard pedestrian reconnaissance and visual inspection field techniques, complimented by the excavation of shovel probes and shovel tests and it was determined the site has limited interpretive potential. Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfill its key corporate principals for developing positive relationships (see draft EIS Section 4.2).</p> <p>Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. Therefore, Denison does not anticipate separate funding for BNDN at this time.</p> <p>Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-</p>	Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project. Therefore, Denison does not anticipate separate funding for BNDN at this time.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.

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		complete an Indigenous Knowledge Study and the results are incorporated into the EIS. The project is located within BNDN's treaty and ancestral lands where members have deep ancestral ties and continue to exercise rights to this day. Most archaeological material in Canada is Indigenous in origin; there is a significant chance that any archaeological material found on site derives from BNDN ancestors. BNDN has inherent rights to its cultural heritage, as affirmed by UNDRIP. I) BNDN requires capacity funding from the proponent to conduct a community-led and project-specific Indigenous Knowledge study so BNDN can evaluate the impacts the project will have on BNDN and so the results of the study may inform the project and its evaluation. II) BNDN requires the EIS to be updated based on the results of BNDN's Indigenous Knowledge Study. BNDN must be engaged on how its results are used to update the EIS. III) The proponent must commit to engaging Indigenous Nations, including BNDN in decision making related to Indigenous archaeological material and sites rather than merely informing these nations.		field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed.				
Birch Narrows Dene Nation	Physical and cultural heritage; Other	<b>BNDN Comment February 28, 2023</b> The presence of strandlines are noted as being an indicator of archaeological potential; however, it is unclear within the reports whether any strandlines are present within the Study Area. Most of the investigations and shovel probes that took place were around existing waterbodies. Request/recommendation: Please indicate whether strandlines are present anywhere in the Study Area.  <b>BNDN Comment January 16, 2024:</b> BNDN Position: Addressed.  <b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed</b> .	BNDN Public Comment February 28, 2023 (BNDN Public Comment #5)	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  Strandlines, like other linear landforms, do increase archaeological potential, however heritage resources are only directly effected by Project activities and there are no strandlines located in the Phoenix Site area (Government of Saskatchewan. N.d. 250K Surficial Geology Linear Landforms. Available at: <a href="https://geohub.saskatchewan.ca/datasets/saskatchewan::250k-surficial-geology-linear-landforms/explore?location=57.247957%2C-106.370278%2C6.33">https://geohub.saskatchewan.ca/datasets/saskatchewan::250k-surficial-geology-linear-landforms/explore?location=57.247957%2C-106.370278%2C6.33</a> [Accessed November 29, 2023]).	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression of the Project, and will be responsive to BNDN's future interests in the Project.
Birch Narrows Dene Nation	Physical and cultural heritage; Other	<b>BNDN Comment February 28, 2023</b> It is unclear whether the locations identified by other Indigenous communities in their Land Use maps were investigated archaeologically and subject where appropriate to shovel testing. Knowing this will give	BNDN Public Comment February 28, 2023 (BNDN Public	<b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b>  Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous	N/A	Resolved - agreement reached by both parties	As per letter received May 26, 2025	Denison will continue to ensure BNDN is informed about the progression

Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>confidence to BNDN that areas they may identify as retaining potential may undergo further assessment if necessary. BNDN notes that there has been limited engagement of our Nation as part of the archaeological baseline studies undertaken at the site. The Wheeler River Project is within our Treaty and Ancestral Lands where our members have deep ancestral ties and continue to exercise our rights to this day. As stewards of the land since time immemorial and holders of both Treaty and Aboriginal rights in the Project area, Denison must engage with us as partners on their activities on our lands. This includes their planning and decision-making related to archaeological materials to which our members have ancestral and spiritual ties.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>- Please indicate whether the areas identified by other Indigenous communities in their Land Use maps were investigated archaeologically.</li><li>- Indigenous communities should be consulted and engaged in decision making rather than merely informed if the archaeological material is expected to be Indigenous in origin.</li></ul> <p><b>BNDN Comment January 16, 2024:</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN maintained their position as outlined in the BNDN January 16, 2024 letter. BNDN Position: <b>Addressed.</b></p>	Comment #6, #8)	<p>communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed.</p> <p>Even the most thorough investigations may not identify all archaeological materials that may be present. Denison advises that if unanticipated archaeological materials or features are encountered as a result of construction or reclamation activities, all work in the immediate area should cease and the Heritage Conservation Branch and local authorities (if applicable) contacted.</p>				of the Project, and will be responsive to BNDN’s future interests in the Project.
Birch Narrows Dene Nation	Physical and cultural heritage; Other	<p><b>BNDN Comment February 28, 2023</b> Discerning archaeological artifacts/ecofacts is difficult at times even to the trained eye; consequently, it is important to undergo training to understand what you could be looking for.</p> <p>Request/recommendation:</p> <ul style="list-style-type: none"><li>a) Staff should undergo training regarding the cultural material they may encounter while on site</li><li>b) BNDN and other Indigenous communities should be invited to attend this training</li></ul> <p><b>BNDN Comment January 16, 2024</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #10)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b></p> <p>Section 5.1.1 describes how all staff working on the Project should be informed of the possibility that they could encounter archaeological resources during their work or leisure time, which will include the proper procedure to follow in the case of a chance find. This could be facilitated by a short archaeological education section in the employee orientation, outlining the types of sites and artifacts that could be encountered in the area, as well as what to do when a potential artifact or site is found. If the chance find is deemed to be an archaeological site, then an HRIA is required and a qualified archaeologist must complete the assessment.</p> <p>Section 11.3.5 Mitigation Measures describes the management of archaeological resources and includes the assessment of the discovery by a qualified archaeologist and mitigation measures including avoidance of the site, shovel testing, systematic and intensive shovel testing, excavation,</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>January 16, 2024 letter. Updated BNDN Position: <b>Not Addressed.</b></p> <p>I) Stronger language must be used to ensure archaeological education does occur as part of staff orientation. The proponent must commit to the requirement that staff undergo training by a qualified archaeologist regarding the cultural material they may encounter while on site as part of staff orientation. BNDN requires confirmation that BNDN and other impacted Indigenous Nations will be invited to attend this training. The project is located in BNDN’s treaty and ancestral lands; given that no Indigenous Knowledge research has been completed to date for this project by BNDN, there is significant concern that ancestral materials will be encountered but not identified, leading to irreparable damage.</p>		<p>and/or construction monitoring. The HRMP outlines mechanisms for Indigenous engagement including the communities and implementation of appropriate cultural protocols.</p>				
Birch Narrows Dene Nation	Physical and cultural heritage; Other	<p><b>BNDN Comment February 28, 2023</b> In numerous instances the Heritage Resources Management Plan (HRMP), Denison has used noncommittal language to describe future Indigenous engagement related to heritage resources. BNDN notes that engagement of impacted Nations is essential for proper heritage resource management and as such the language in the HRMP should reflect the necessity of this engagement. Request/recommendation: Throughout the HRMP, Denison must change the language of “should” to “will” where appropriate. For example: management options will be presented to the applicable Indigenous communities for feedback and will include consultation.</p> <p><b>BNDN Comment January 16, 2024:</b> BNDN Position: Addressed.</p> <p><b>BNDN Comment May 26, 2025</b> BNDN changed their position as outlined in the BNDN January 16, 2024 letter. Updated BNDN Position: <b>Partially addressed.</b></p> <p>The proponent should report back to BNDN regarding how the language was updated and whether there were any instances the proponent did not update the</p>	BNDN Public Comment February 28, 2023 (BNDN Public Comment #11)	<p><b>Denison Response November 29, 2023 (Response to BNDN Comment February 28, 2023)</b> The Heritage Resources Management Plan will be revisited for use of language 'should' to 'will' where appropriate.</p>	<p>The HRMP was revisited for language of “should” to “will” where appropriate.</p>	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	As per letter received May 26, 2025	Discussions continue with BNDN about working toward a resolution on these issues.



Indigenous Nation, Métis Local, Community, Or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		language from ‘should’ to ‘will’; justification should be provided in these instances.						

Appendix C-6: LLRIB Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Lac La Ronge Indian Band	Health and socio-economic conditions	Interest for information regarding employment opportunities.	ROC 392	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.	Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement.	Based on Denison's understanding of the comment, the comment made has a relationship to similar-type public comments made by LLRIB on the draft EIS. Denison has responded to the LLRIB on the draft EIS public comments, by providing background information, clarification on assumptions and approach taken, and/or has outlined a proposed approach forward to the LLRIB. Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.	A meeting was held on August 30, 2023 and resulted in response to LLRIB comments which were submitted on November 06, 2023. An in-person meeting was held on June 12, 2024 and resulted in correspondence submitted to the LLRIB on June 28, 2024.	Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.
Lac La Ronge Indian Band	health and socio-economic conditions; Current use of	Resource development projects in the Traditional Territory of LLRIB have had significant impact to community members and their traditional way of life. LLRIB is concerned about potential adverse impacts to the ability to hunt, fish and trap for food and/or carry out traditional uses including cultural, spiritual or other important	LLRIB public comments received February 9, 2023	The Lac La Ronge Indian Band ("LLRIB") hosted Denison Mines Corp. ("Denison") at the Lac La Ronge Indian Band ("LLRIB") Traditional Lands & Resources Advisory Committee ("TLRAC") meeting in Missinipe, on August 30, 2023. Denison appreciated the invitation to provide the TLRAC with an update on the Wheeler River Project ("Project"), including responding to the specific	Denison is committed to, as described in Section 13, collaborating with Indigenous peoples and communities to build long-term, respectful, trusting,	Based on Denison's understanding of the concern or comment,	A meeting was held on August 30, 2023 and resulted in response to	Denison will continue to engage with LLRIB on remaining

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
	lands and resources for traditional purposes;	sites near the proposed project area. LLRIB encourages Denison Mines to: (1) Reach out to the LLRIB to engage LLRIB members and impacted land users. (2) Support the LLRIB Heritage Fund which enables community members to practice traditional activities (3) Reach out to LLRIB's economic development company, Kitsaki Management, to ensure local and Indigenous involvement		<p>concerns raised by LLRIB in its February 9, 2023 letter to the Canadian Nuclear Safety Commission providing comments on Denison's comprehensive Environmental Impact Statement for the Project.</p> <p>As we affirmed during the meeting, the Project is located in the N-18 furblock for registered trappers and is outside the publicly available information regarding the LLRIB Traditionally Occupied Territory. Denison heard the TLRAC's information and perspective shared with us that there are LLRIB land users in the area, irrespective of furblock boundaries, and there remains general concern that land users could be impacted by the Project. As Denison explained during the meeting, we would welcome any specific information about land users in and around the Project area. From the evidence Denison is aware of so far, we are of the view that the outcome of Denison's comprehensive effects assessment in the areas of aquatic and terrestrial environments, and the associated potential impacts to the ability to exercise Indigenous Rights, leads to the conclusion that there will be no significant adverse residual effects to land use activities resulting from the Project. We recognize that this is an evolutionary process, such that if further information arises which indicates a different or more nuanced conclusion, we will review it and consider whether changes to our current direction are appropriate.</p> <p>In accordance with our Indigenous Peoples Policy, Denison is committed to collaborating with Indigenous peoples and communities to build long-term, respectful, trusting, and mutually beneficial relationships. With respect to using Kitsaki-owned businesses to support Denison's activities, Denison is proud of the work we have done to date with Kitsaki Management-owned companies including CanNorth and Northern Resource Trucking, and understand the opportunities for further work in the future as the Project progresses. As mentioned in the meeting, since 2019, Denison has spent more than \$1.1M dollars with Kitsaki-owned companies and has intentions to continue this positive trend as much as possible. Denison also understand the interests in general employment opportunities at the Project once approval is received to proceed, and are happy to have already received the contact information for the Community Relations Liaison Officer for Lac La Ronge Indian Band. This helpful contact will ensure that we have a fulsome listing of entities to which employment opportunities can be shared over the next while.</p> <p>Further, we understand as a company working in northern Saskatchewan, Denison wishes to respect and support efforts and initiatives that our neighbours, such as LLRIB and the TLRAC feel are important. As noted in your correspondence dated February 9, 2023 we understand that the Heritage Fund is such an initiative, and as such, Denison is pleased to contribute to the Heritage Fund for the amount of \$5,000. We trust that this contribution will continue to support and encourage community members to practice traditional activities.</p>	and mutually beneficial relationships. With respect to using Kitsaki-owned businesses to support Denison's activities, Denison is proud of the work we have done to date with Kitsaki Management-owned companies including CanNorth and Northern Resource Trucking, and understand the opportunities for further work in the future as the Project progresses. Denison also understand the interests in general employment opportunities at the Project once approval is received to proceed, and are happy to have already received the contact information for the Community Relations Liaison Officer for Lac La Ronge Indian Band. This helpful contact will ensure that we have a fulsome listing of entities to which employment opportunities can be shared over the next while. Further, we understand as a company working in northern Saskatchewan, Denison wishes to respect and support efforts and initiatives that our neighbours, such as LLRIB and the TLRAC feel are important. As noted in your correspondence dated February 9, 2023 we understand that the Heritage Fund is such an initiative, and as such, Denison is pleased to contribute to the Heritage Fund for the amount of \$5,000. We trust that this contribution will continue to support and encourage community members to practice traditional activities.	Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the LLRIB. Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.	LLRIB comments which were submitted on November 06, 2023. An in-person meeting was held on June 12, 2024 and resulted in correspondence submitted to the LLRIB on June 28, 2024.	issues of concern, in an appropriate and mutually agreeable manner.
Lac La Ronge Indian Band	Other	Questions and clarifications on ISR mining methodology, and construction schedule	ROC 392	Section 2 provides information about the various Project elements and anticipated Project construction timing. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring	N/A	Based on Denison's understanding	A meeting was held on August 30, 2023 and	Denison will continue to engage with

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				uranium from within a host rock, while the host rock remains in place (in situ) below surface (see Section 2 for further information). Section 2 provides a schedule including construction (year 1 to 3), operations (year 3 to 18), decommissioning (year 18 to 23), and post decommissioning (year 23 to 38). See Section 2.3 for a summary of the anticipated key activities for Construction, Operation, Decommissioning and Post-Decommissioning of the Project.		of the comment, the comment made has a relationship to similar-type public comments made by LLRIB on the draft EIS. Denison has responded to the LLRIB on the draft EIS public comments, by providing background information, clarification on assumptions and approach taken, and/or has outlined a proposed approach forward to the LLRIB. Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.	resulted in response to LLRIB comments which were submitted on November 06, 2023. An in-person meeting was held on June 12, 2024 and resulted in correspondence submitted to the LLRIB on June 28, 2024.	LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.
Lac La Ronge Indian Band	Other	Concern about the effects the Project may have on the environment and interest in understanding what was required for construction.	ROC 392	Section 2 provides information about the various Project elements and anticipated Project construction timing. Information on how the Project may affect the environment is included throughout the EIS.	N/A	Based on Denison’s understanding of the comment, the comment made has a relationship to similar-type public	A meeting was held on August 30, 2023 and resulted in response to LLRIB comments which were submitted on November 06,	Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
						comments made by LLRIB on the draft EIS. Denison has responded to the LLRIB on the draft EIS public comments, by providing background information, clarification on assumptions and approach taken, and/or has outlined a proposed approach forward to the LLRIB. Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.	2023. An in-person meeting was held on June 12, 2024 and resulted in correspondence submitted to the LLRIB on June 28, 2024.	agreeable manner.
Lac La Ronge Indian Band	Other	Questions about ISR mining technique, including the potential for any tailings being left behind.	ROC 392	Section 2 provides information about the various Project elements and anticipated Project construction timing. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface (see Section 2 for further information). The proposed ISR mining method for the Project will produce minimal volumes of waste and does not require the development of a conventional tailings management facility. A waste management program will be developed for the Project to support licensing. Denison is proposing to design pond, pad, and landfill liners systems and develop appropriate performance monitoring based on the characteristics of the material being stored.	N/A	Based on Denison’s understanding of the comment, the comment made has a relationship to similar-type public comments made by LLRIB on the draft EIS. Denison has responded to the LLRIB on the draft EIS	A meeting was held on August 30, 2023 and resulted in response to LLRIB comments which were submitted on November 06, 2023. An in-person meeting was held on June 12, 2024 and resulted in correspondence submitted to	Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
						public comments, by providing background information, clarification on assumptions and approach taken, and/or has outlined a proposed approach forward to the LLRIB. Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.	the LLRIB on June 28, 2024.	
Lac La Ronge Indian Band	Other	Concern expressed for incorporation of chemical and pollutants into the water environment and the effects to water quality and health of aquatic species.	ROC 392	Section 8 provides information on surface water quality and aquatic habitat and how these values overlap with potential effects of the Project.	N/A	Based on Denison’s understanding of the comment, the comment made has a relationship to similar-type public comments made by LLRIB on the draft EIS. Denison has responded to the LLRIB on the draft EIS public comments, by providing background information, clarification on assumptions	A meeting was held on August 30, 2023 and resulted in response to LLRIB comments which were submitted on November 06, 2023. An in-person meeting was held on June 12, 2024 and resulted in correspondence submitted to the LLRIB on June 28, 2024.	Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
						and approach taken, and/or has outlined a proposed approach forward to the LLRIB. Denison will continue to engage with LLRIB on remaining issues of concern, in an appropriate and mutually agreeable manner.		

Appendix C-7: ALBML Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
A La Baie Métis Local #21	Other	A concern was expressed about racism despite a “zero tolerance” policy.	ROC 62	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
A La Baie Métis Local #21	Other	Interest about discharge testing.	ROC 62	<p>During Construction, no effluent is expected to be released to the aquatic environment. Contact water stored in the Clean Waste Rock Pond during Construction and will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / license requirements. The sequence for Construction activities will occur in a logical manner based on Project execution plans. For example, construction of the wellfield runoff pond will be prioritized during the early part of Construction and it will able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the Clean Waste Rock Pond. Other secondary contingency measures are also available should the volume of water requiring management exceed site infrastructure storage volume. This could include use a hydrovac for offsite disposal.</p> <p>Treated Effluent Monitoring and Release Ponds in Section 2.2.3.9 of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond.</p>	The Project will adhere to treated effluent discharge limits as stipulated in operating approvals and by regulations and for protection of aquatic life and receptors associate with the water exposure pathway.	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				Denison expects the Provincial Approval to Operate a Pollutant Control Facility will contain specific effluent quality limits and monitoring to confirm effluent quality meets the approved limits. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.				
A La Baie Métis Local #21	Other	Questions and clarification about the ISR mining process, including alternative power usage and transportation of acid.	ROC 1 ROC 62 ROC 197	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface.</p> <p>Section 2.2.1.3 provides information on freeze wall technology. The freeze wall is intended for tertiary containment of mining solution to support a defence in depth strategy as additional, site-specific data is obtained on hydraulic containment. The freeze wall around the mining area will extend from the surface to the basement rock, isolating the mining area from regional groundwater. The freeze wall is expected to be a minimum of 10 m thick, be installed 25m away from the uranium deposit, and extend 30 m into the basement rock. Data from the groundwater monitoring network installed in and around the wellfield and freeze wall will make sure the freeze wall is meeting design specifications.</p> <p>Sections 2.2.6.1 and 2.2.6.2 provide information on primary and back-up power supplies. Electrical service to the Project will be provided via an approximate 5-km extension tap from the existing 138 kV overhead transmission line that runs along Highway 914. To provide electrical service during times of utility outages, diesel generators will be installed to service the site and maintain essential functions.</p>	N/A	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
A La Baie Métis Local #21	Other	Questions were asked regarding the quality and number of lakes tested.	ROC 62	<p>Surface water quality was sampled during 2016, 2018, and 2019 at lakes and watercourses within the LSA and RSA (Figure 8.2-4 and Appendix 8-D). Sampling at lakes and ponds included the measurement of both physical and chemical parameters obtained in situ during field surveys and by laboratory analysis.</p> <p>Locations of interest for this assessment nodes that are coincident with baseline monitoring stations and/or watersheds of interest to the assessment. Surface water quality along with other study components were sampled at stations SA-1, SA-2, SA-3, SA-4, SA-5, SA-6, SB-3, SB-5, LAB, LB-2, LA-1, LA-5, and LA-6. These stations are located on the Iclander River, McGowan Lake, Whitefish Lake North, Whitefish Lake South, Russell Lake Inlet, near the outlet of Williams Lake as shown in Figure 8.2-4.</p> <p>As detailed in descriptions of existing surface water quality (Section 8.2.3.3), parameters where water quality guidelines were available, most were below their respective guidelines at all sampling locations. Cases where constituent concentrations exceeded guidelines are detailed in Table 8.2-2. Generally, at least one sample from each waterbody within the LSA contained aluminum concentrations that exceeded the SEQG. In some cases, such as waterbodies LB-2 and SB-3, all water samples exhibited aluminum concentrations higher than</p>	N/A	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				the SEQG. There were also several instances where water pH was below the lower threshold of the CCME CWQG for the Protection of Aquatic Life, such as samples from Whitefish Lake North, SA-1, SA-3, SA-5, SA-6, SB-3, and SB-5 (Table 8.2-4). Other metals that had higher concentrations than their guidelines included lead, iron, and cadmium, though in these cases, the maximum concentration was only marginally above the guideline value.				

Appendix C-8: PBCN Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
PBCN	Current use of lands and resources for traditional purposes	PBCN concern: what are the potential impacts to the landscape, including aquatic and terrestrial environments?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares (for reference, the McIlvenna Bay Project is 1,029 hectares [8 times bigger than Denison's Project]). A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations.	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Current use of lands and resources for traditional purposes	PBCN concern: what are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	See above answer regarding the scale of the Project in the landscape. While it is acknowledged that the footprint is not “zero” it is a small footprint on the landscape scale and the assessment of the potential effects of the Project has concluded that the Project will not that will cause a change in any component of the environment that would alter its status or integrity beyond an acceptable level. Specifically, as it concerns the risk of introduction of contaminants to the environment the following is noted. A Human Health risk Assessment (HHRA) was undertaken for the Project in Section 10. The HHRA evaluated direct exposure to constituents of potential concern (or contaminants) released to air and water, and through indirect exposure to the constituents associated with soil, sediment, and food, such as fish, wildlife, and plants. The assessment was inclusive of information based on use of traditional foods and a specific traditional food diet from ERFN. The overall conclusion of the HHRA was that there would be no significant adverse effects to human health from the Project.	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Current use of lands and resources for traditional purposes	PBCN concern: what are potential accident or spill impacts on the harvesting of plant specific country foods?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	A standalone Accidents and Malfunctions (A&M) assessment was completed and is summarized in Section 14 of the EIS (full report is Appendix 14-A of the EIS). The A&M assessment considered almost 70 accident scenarios including many that would relate to the unplanned release of chemicals and radiation to the environment with potential to effect country foods. Specific scenarios including the release of chemicals and radiation to the aquatic environment and to the terrestrial environment adjacent to the ERFN and KML culture camps located along Hwy 914. The overall risks in consideration of likelihood and consequence were characterized as low. The assessment concluded that with planned engineering / environmental design features, mitigation measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical.	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Current use of lands and resources for traditional purposes	PBCN concern: will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	Access limitations will be limited to the 169 hectare footprint of the site (for reference, the McIlvenna Bay Project is 1,029 hectares [8 times bigger than Denison's Project]). Access north of the Key Lake Road is already limited to a select number of individuals/resource harvesters, and will remain in place until such a time that the access is changed by other parties. Limitation to Indigenous Land and Resource Use beyond the Project footprint and along Highway 914 are expected to result from Project related traffic. Denison is sensitive to areas of high value to ERFN and KML along Highway 914, and is working with these communities to ensure that appropriate mitigations and restrictions are in place during periods of intensive use, such as community-	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.

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				hosted cultural camps proximal to Highway 914. These, and any other mitigations could be applicable to all users of Highway 914, inclusive of PBCN. Although the known trapper in the Project area is recently deceased, it is understood that similar uses are expected from future ERFN members. When the trapline is transferred, a trapper’s compensation agreement with inclusions for loss of commercial income and/or any in-kind support related to access and continued use will be contemplated with the future user (irrespective of their home community).				
PBCN	Current use of lands and resources for traditional purposes	PBCN concern: how will Denison use freshwater from Whitefish Lake?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	The specific activity of water taking from White Lake to support the mining operation was assessed in Section 8.1.4.2.2 of the EIS. Based on a conservative (i.e., high) estimate of water taking it was estimated that the taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by about 1 cm. These small incremental changes would be beyond the ability of monitoring techniques to practically measure and are much less than the natural variability seen. For these reasons the EIS concluded that these minor incremental changes did not represent a significant adverse effect.	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Current use of lands and resources for traditional purposes	PBCN concern: what are the potential impacts to boreal shield woodland caribou?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	The Caribou in SK1 are stable. Potential effects on Woodland Caribou were considered in Section 9.3 of the EIS and it was concluded that there would be no significant adverse effects. The full reasoning for that conclusion can be found in the EIS but the conclusion was based on several factors including the small spatial scale of the Project relative to the SK1 range (0.001%), risk of Project-related mortality being below natural variation, and the various mitigations that will be implemented. An initial Draft Caribou Management Plan has been developed, provided to regulators, and this document will be used as a framework to further reduce or mitigate potential Project-related effects. The plan is a living document that will evolve over time in response to the eventual Provincial overall management plan for the SK1 range.	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Current use of lands and resources for traditional purposes	PBCN concern: how will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	Potential effects from the Project on water quality were assessed in Section 8.2 of the EIS and the assessment directly evaluated discharge of effluent from the site using predictive modeling. Water treatment will occur; testing will occur prior to release; and no release will occur if water quality des not meet objectives. The predictive modeling showed that constituent concentrations including radionuclides would be below water quality objectives for the protection of aquatic life (i.e., no effects would be expected) at the outlet of White Lake well upstream of the outflow of the Icelander River to Russel Lake. Since no impact are expected to occur in these areas close to the Project, it can also be concluded that no effects would accrue in areas further downstream in the watershed where contributing sub watersheds are many, many-times the size of the sub watersheds near the Project site. In addition, the HHRA concluded that there would be no human health risks related to the Project for traditional food users in consideration of traditional food uses in relatively close proximity to the Project site. As above, if Project effects are not found in relatively close proximity to the site, there is no risk of Project effects in more downstream areas. Finally, the A&M assessment (see response to Question #8; Section 14 of the EIS) did evaluate unplanned releases of chemicals and radioactivity to the environment. As noted, the assessment concluded that with planned engineering / environmental design features, mitigation	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.



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				measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical.				
PBCN	Health and socio-economic conditions	PBCN concern: what are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	Both the construction and operation camps will operate on a fly-in/out basis, limiting the opportunities for interactions between the workforce and Indigenous communities, as workers will be transported by air directly to the site. Other measures to protect community well-being of people employed on the site include health and wellness programming, life skills programming, employee and family assistance programming, implementing a no drug and alcohol policy on site, and offering culturally sensitive employment policies available to all employees, inclusive of any PBCN members.	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Health and socio-economic conditions	PBCN concern: what is the proposed means and haul route of yellowcake product to the market?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	<p>The yellowcake will be transported in industrial containers, in accordance with the Transportation of Dangerous Goods Act.</p> <p>Project-related truck traffic during Construction and Operation (such as surface construction equipment, materials, and drill rigs) is expected to originate from Saskatoon or other southern locations. Project-related traffic originating from the west may travel through Beauval via Highway 165, whereas traffic from the south and east may access Highway 165 via Highway 2. Traffic from Saskatoon would likely use Highway 11 to Prince Albert and Highway 55 to Beauval, then travel via Highway 165. Highways are under the authority of the Saskatchewan Ministry of Highways.</p>	Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Health and socio-economic conditions	PBCN concern: are there employment or procurement opportunities for PBCN members or Group of Companies?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan, inclusive of PBCN communities) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. PBCN businesses would fall in the category of northern Saskatchewan businesses, which would place them in line for second preference if project needs cannot be met within the local study area.	Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan, inclusive of PBCN communities) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. PBCN businesses would fall in the category of northern Saskatchewan businesses, which would place them in line for	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.

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					second preference if project needs cannot be met within the local study area. Further details are described in Section 13.			
PBCN	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	PBCN concern: how will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	PBCN Public Comment March 3, 2023 (PBCN Public Comment #92)	Denison acknowledges PBCN interests in respect of the Project. Detailed monitoring programs to be developed through licensing and this will include how data is going to be reported and shared. The regulators have developed third party monitoring programs and undertake data review on an ongoing basis.	Detailed monitoring programs to be developed through licensing and this will include how data is going to be reported and shared. Denison has been discussing the interests and concerned identified by PCBN on an on-going basis since March of 2023, and will continue to share information regarding the Project.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p>PBCN is concerned that the Project has potential adverse environmental, cultural and socio- economic impacts to PBCN members, lands and uses, including hunting, fishing and gathering in all seasons.</p> <p>Both Denison and CNSC indicate that they have fulsome aboriginal engagement policies and guidelines and appear to be undertaking their delegated Crown duty to consult in good faith, as informed by those policies, principles, legal and regulatory requirements. However, there has been an initial error in the assessment, both by Denison and CNSC, as PBCN was erroneously excluded from indigenous engagement, ostensibly due to distance from Wheeler and a lack of understanding of PBCN lands and Indigenous activities potentially impacted by the project.</p> <p>PBCN wishes to participate fully in the regulatory review of the Wheeler River project. PBCN requests that the CNSC ensure that it’s review timelines be adjusted, as required, to ensure fulsome participation by PBCN with the proponent and the regulator, going forward.</p> <p>PBCN’s goals are to:</p> <ul style="list-style-type: none"><li>• Meet with CNSC to share PBCN knowledge of its land, and Indigenous uses, and how these may be impacted by the Project and methods to address any adverse impacts.</li><li>• Establish a shared understanding of how PBCN would like to be engaged in the regulatory review, including, but not restricted to, timely project updates, information and an opportunity to discuss concerns throughout the EA process, including the review of the EIS, CNSC’s staff’s EA Report, and other project-related documentation.</li></ul>	PBCN Public Comment March 3, 2023 (PBCN Public Comment #90)	Denison followed the criteria identified in CNSC's REGDOC 3.2.2 v 1.2 in determining the Project's Indigenous Communities of Interest. By way of background, Denison has been the operator of the Wheeler River property since 2004, and its predecessors have been in the area since the 1980s. Denison followed a systematic and comprehensive process to identify Indigenous communities who may be impacted by the Project, informed by a wide variety of information, such as the wildlife and fur block management administration areas, existing traditional land use information (particularly information made available through the Key Lake and McArthur River public review processes), access restrictions on Highway 914 north of Key Lake, anticipated impacts to water, anticipated transportation routes, and publicly available descriptions of Indigenous Nations’ traditional territories, including that of PBCN. Our approach was further informed by our discussions with those Indigenous Nations with the potential to be adversely effected by Project activities, as well as Indigenous organizations in the region, and supported by information from and interactions with representatives of the Saskatchewan Ministry of Environment (MOE) and Canadian Nuclear Safety Commission (CNSC). Denison has been discussing the interests and concerned identified by PCBN on an on-going basis since March of 2023, and will continue to share information regarding the Project.	Denison has listed PBCN as an Other Indigenous Community in Section 4, and has updated figures in Section 1 (Figure 4-1) and Section 4 (Figure 4.3-1 and Figure 4.3-2) accordingly.	This has not been identified as a remaining issue for PBCN.	As per PBCN letter to Denison dated April 8, 2025.	Denison remains willing to engage on this topic as needed in the future.
PBCN	Health and socio-	PBCN is concerned that the Project has potential adverse environmental, cultural and socio- economic impacts to PBCN	PBCN Public Comment	Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to	Denison remains committed to conducting meaningful	This has not been identified	As per PBCN letter to	Denison remains willing to engage on

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	economic conditions; Current use of lands and resources for traditional purposes;	<p>members, lands and uses, including hunting, fishing and gathering in all seasons.</p> <p>Both Denison and CNSC indicate that they have fulsome aboriginal engagement policies and guidelines and appear to be undertaking their delegated Crown duty to consult in good faith, as informed by those policies, principles, legal and regulatory requirements. However, there has been an initial error in the assessment, both by Denison and CNSC, as PBCN was erroneously excluded from indigenous engagement, ostensibly due to distance from Wheeler and a lack of understanding of PBCN lands and Indigenous activities potentially impacted by the project.</p> <p>PBCN meets nearly all of Denison’s stated criteria to evaluate Indigenous communities located within the Saskatchewan Northern Administration District that would be engaged by Denison.</p> <p>A full and accurate description of PBCN’s rights and interests is an essential part of the Wheeler EIS and is necessary to ensure a fulsome environmental assessment. PBCN is interested in the opportunity to collaborate with Denison mines to comprehensively identify PBCN’s rights and interests that may be impacted by the project.</p> <p>PBCN’s goals are to:</p> <ul style="list-style-type: none"><li>• Work together with Denison in a spirit of mutual respect to cooperate to collectively identify means to avoid, mitigate or otherwise address potential negative impacts of the project on PBCN’s territory and the exercise of its Indigenous rights and interests.</li><li>• Participate in a funding agreement with Denison to facilitate and support PBCN participation and meaningful engagement in the EA process.</li><li>• Meet with Denison to share PBCN knowledge of its land, and Indigenous uses, and how these may be impacted by the Project and methods to address any adverse impacts.</li><li>• Explore employment and job opportunities related to the Project.</li></ul>	March 3, 2023 (PBCN Public Comment #91)	understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. Denison has been corresponding with PBCN on these issues and concerns since March of 2023, including written correspondence and an in-person meeting with PBCN on September 20, 2023. We believe that consultation and engagement is an iterative, two-way process, such that as we learn about the Project, its potential impacts, and the interests of Indigenous peoples in the region, we will continue to tailor our approach to engagement. It is in this spirit that we have continued to engage with PBCN to better understand the Nation’s interests and land uses in the vicinity of the Project.	engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. Denison has been discussing and engaging with PBCN regarding the interests and concerns identified by PBCN on an on-going basis since March of 2023, and will continue to share information regarding the Project with PBCN.	as a remaining issue for PBCN.	Denison dated April 8, 2025.	this topic as needed in the future.
PBCN	Other	a. PBCN is particularly concerned about the proposed use of freshwater resources for mining operations and the release of treated effluent into Whitefish Lake. PBCN has specifically identified that PBCN members do fish the lakes surrounding the Proposed Project. PBCN does not see any assurances in the Technical Comments or regulatory documents that the water quality downstream, including water accessed by PBCN communities, will not be compromised. Stringent guidelines must be added as conditions to any environmental regulatory approval, certificate, permit, or licence granted. PBCN would like to review	PBCN comment (Letter to Denison May 27, 2025)	In response to comment (a), the potential effects from the Project on water quality were assessed in Section 8.2 of the Environmental Impact Statement (“EIS”), and the assessment directly evaluated discharge of effluent from the site using predictive modeling. The predictive modeling showed that constituent concentrations including radionuclides would be below water quality objectives for the protection of aquatic life (i.e., no effects would be expected) at the outlet of White Lake well upstream of the outflow of the Icelandier River to Russell Lake. Since no impacts are expected to occur in these areas close to the Project, it can also be concluded that no effects would accrue in areas further downstream in the watershed where contributing sub	N/A	Ongoing - It is Denison's understanding that Denison and PBCN have in place a mutually defined process for the	Denison letter to PBCN dated August 11, 2025	Denison will continue to work with PBCN to address interests expressed by PBCN.

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		<p>the language of all conditions prior to the province settling these terms with Denison.</p> <p>b. PBCN would like to co-develop a water quality monitoring program downstream of Whitefish Lake. Additionally, PBCN would like to receive regular copies of water quality monitoring reports moving forward.</p>		<p>watersheds are many-times the size of the sub watersheds near the Project site. Additionally, the Human Health Risk Assessment concluded that there would be no human health risks related to the Project for traditional food users in consideration of traditional food uses in relatively close proximity to the Project site. Similar to the above, Project effects were not considered a risk to human health at those areas close to the Project site, so human health in areas significantly downstream of the Project pose even less risk than those areas closest to it, such as Kinoosao, Southend and Sandy Bay.</p> <p>Denison trusts that the process we have mutually defined in respect of water quality monitoring satisfies the request in comment (b).</p>		resolution of these issues.		
PBCN	Current use of lands for traditional purposes	<p>a. PBCN is concerned about the quality and quantity of resources that PBCN members rely on for subsistence, including wildlife, vegetation, and water.</p> <p>b. Given that PBCN members actively fish, hunt, trap and harvest for medicinal and sacred purposes in and around the Proposed Project, and three of our communities are downstream of the Proposed Project, PBCN requests that water quality monitoring stations be set up at Kinoosao, Southend, and Sandy Bay to ensure accurate data is collected. PBCN understands that there is already a commitment to implement a groundwater protection and monitoring plan, including development of a groundwater monitoring well network, and PBCN would like this protection and monitoring plan extended to incorporate the three additional water quality stations at Kinoosao, Southend, and Sandy Bay.</p> <p>c. PBCN would like capacity funding to monitor these stations independently.</p> <p>d. PBCN is also interested in participating in the environmental committee overseeing this project as well as the BATEA (Best Available Technology Economically Achievable) study.</p> <p>e. PBCN also wishes to be kept informed of any spills and be included in all spill contingency planning and responses.</p> <p>f. PBCN notes that the potential residual effect on human health from exposure to selenium has been identified by Denison but there is no commitment to any monitoring of selenium or any other contaminants of potential concern (COPC) including, but not limited to, uranium, arsenic, cadmium other heavy metals or chemicals in the accumulation in fish and mammals or the bioaccumulation in plants, berries or fungus. PBCN members derive large portions of their diet from country food. To ensure the safety and well-being of PBCN members who rely on the surrounding ecosystem for subsistence harvesting, it is essential to establish a comprehensive tissue sampling program to monitor</p>	PBCN comment (Letter to Denison May 27, 2025)	<p>Denison trusts that the process we have mutually defined regarding the topics in comments (a) to (f) address PBCN’s concerns.</p> <p>For additional context regarding comment (f), as the Project advances and operational monitoring is underway, Denison will assess health risks from fish consumption by comparing fish tissue data collected during operation from the monitoring program against Health Canada's mercury guideline of 0.5 ug/g wet weight. This is a human health risk-based maximum permissible concentration. Mercury data presented throughout the EIS represents total mercury. Denison will include methylmercury as part of the constituents monitored in fish throughout all Project phases. Engagement on licensing requirements, such as the development of the environmental monitoring program and the associated monitoring regime, will occur to support Project permitting and licensing efforts.</p>	N/A	Ongoing - It is Denison's understanding that Denison and PBCN have in place a mutually defined process for the resolution of these issues.	Denison letter to PBCN dated August 11, 2025	Denison will continue to work with PBCN to address interests expressed by PBCN.

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		COPC downstream of the Proposed Project. PBCN requests Denison commit to long-term monitoring and co-development of the program with the PBCN Lands and Resources Department. The long term tissue sampling program would focus on edible parts of fish and mammals and bioaccumulation in leaf, root and fungal tissue of medicinal plants, berries and fungus which PBCN members collect, harvest, use and ingest.						
PBCN	Current use of lands for traditional purposes, Other	<p>a. The development of the Proposed Project site could significantly impact culturally important species, including caribou. Changes to air and noise quality may disrupt wildlife in the area up to considerable distances away from the Proposed Project. PBCN requests an opportunity to review and comment on all caribou mitigation and offsetting plans to ensure the disruption to the exercise of PBCN’s aboriginal rights to hunt caribou is minimized.</p> <p>b. PBCN has already advised the province that PBCN members historically and currently use the areas in and around the Proposed Project to gather medicinal plants and fungus, and to hunt moose, caribou, duck and geese, and trap lynx, beaver and muskrat.</p> <p>c. PBCN is concerned about the contamination of vegetation, fish, wildlife, water and soil, which would affect the traditional foods and livelihoods of our people. PBCN has advised you that PBCN members hunt, fish and trap areas in and around the Proposed Project as well as dry traditional foods and store such food in and around the Proposed Project area. PBCN’s experience on other natural resource development projects is that tainting or perceived diminishment of the quality of the land and resources around the Proposed Project will result in avoidance of harvesting of country foods by PBCN members.</p>	PBCN comment (Letter to Denison May 27, 2025)	<p>In response to comment (a), Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project’s detailed decommissioning plan. Denison commits to sharing the caribou mitigation plan with PBCN for review and comment. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.</p> <p>In response to comment (b), Section 11 of the EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take a distinctions based approach (i.e., the potential impact on each Indigenous community is not evaluated separately), but rather focuses on the key indicators and associated measurable parameters. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal.</p> <p>In response to comment (c), Denison trusts that the process we have mutually defined in respect of these topics addresses PBCN’s concerns.</p>	N/A	Ongoing - It is Denison's understanding that Denison and PBCN have in place a mutually defined process for the resolution of these issues.	Denison letter to PBCN dated August 11, 2025	Denison will continue to work with PBCN to address interests expressed by PBCN.



### Appendix C-9: MNS Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes	Interest and questions asked about IK including how Denison is pursuing this, the process of obtaining IK, and whether money was available for IK studies.	ROC 62	A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (including for Sections 4, 11, 12, and 13).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; other	The EIS notes that “In 2021, Denison announced the adoption of an Indigenous Peoples Policy (IPP). The IPP reflects Denison's recognition of the important role of Canadian business in the process of reconciliation with Indigenous peoples in Canada and outlines Denison's commitment to take action towards advancing reconciliation. The IPP was developed based on Denison's experiences with, as well as feedback and guidance received from, Indigenous communities with whom Denison is actively engaged. This approach was designed to make sure the IPP appropriately captures a mutual vision for reconciliation. The IPP identifies five key areas of action that will support the ongoing development of a continuously evolving Reconciliation Action Plan (RAP): Engagement; Empowerment; Environment; Employment; and Education. Through the RAP, Denison is striving to interweave the principles of reconciliation throughout all areas of the company's operations (Denison 2021a).” Denison does not explain how it will accomplish free, prior, and informed consent (FPIC) as per the IPP and RAP [2]. Recommendations: - Denison needs to clarify how it intends to consider free, prior, and informed consent (FPIC). [2] Engagement – We are committed to building long-term and mutually respectful relationships through proactive engagement and consultation with Indigenous people. Our aim is to work to achieve the free, prior, and informed consent, where the potential for impacts to rights may occur, before proceeding with economic development projects and during ongoing activities and operations	MN-S Public Comments (March 4, 2023) (Public Comment #456)	Denison's IPP is a principles based policy and addresses its vision for reconcile-action in all of Denison's activities. How the policy will be executed will vary on a project to project and community to community basis. The process includes a continually evolving Reconciliation Action Plan, that Denison will seek periodic input on from its Indigenous partners to ensure that it remains relevant to in the ongoing evolving landscape of reconciliation.	Denison will seek periodic input on from its Indigenous partners to ensure that it remains relevant to in the ongoing evolving landscape of reconciliation	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Denison’s Draft EIS notes that Denison and MN-S were in the process of developing a capacity funding agreement. Since the Draft EIS was published, Denison and MN-S reached an agreement. Recommendations: - Denison needs to revise the Final EIS to note that a capacity funding agreement was reached with MN-S.	MN-S Public Comments (March 4, 2023) (Public Comment #462)	The EIS will be updated to reflect the capacity funding agreement reached with the MN-S.	Section 4 of the EIS is updated to reflect the capacity funding agreement reached with the MN-S.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for	Métis input to VC selection was limited to NR3 communities. Recommendations: - Denison needs to confirm the selected valued components with	MN-S Public Comments (March 4,	At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings,	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1	This has not been identified as an	As per MN-S letter dated	Denison remains willing to



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	traditional purposes; Other	Métis Locals in NR1 and NR3 and revise the Final EIS as required to reflect their input. - Denison needs to include in the Final EIS input from the Métis Knowledge Study and any changes in the selection of VCs and their characterization.	2023) (Public Comment #463, #487)	Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time.  A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	outstanding issue by the MN-S in its correspondence dated March 31, 2025.	March 31, 2025	engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The use of “complimentary and influential” does not reflect current best practices that acknowledge Indigenous Knowledge as an equal but different way of knowing (than western science). This terminology implies that Indigenous Knowledge can be absorbed into a scientific approach. Recommendations: - Denison needs to confirm use of the wording “complimentary and influential” and how the use of Indigenous Knowledge is treated as equal to western science in the Final EIS. - Denison needs to confirm if it intends the use of “complimentary” or “complementary”. Best practices will differ depending on intention.	MN-S Public Comments (March 4, 2023) (Public Comment #464)	Section 5.1 of the EIS explains that the project is assessment under the Canadian Environmental Assessment Act, 2012, along with the Saskatchewan Environmental Assessment Act. As such, the Canadian Environmental Assessment Agency's reference guidance (CEAA 2015) on considering Aboriginal traditional knowledge for EAs under the Canadian Environmental Assessment Act 2012 is considered as relevant guidance. Further to this (see Section 3.3.1 of the EIS) Denison has committed to working with Indigenous communities in a spirit of mutual respect and cooperation. Denison's Indigenous Peoples Policy reflects the company's belief that reconciliation is advanced through collaboration with Indigenous peoples and communities to build long-lasting, respectful, trusting, and mutually beneficial relationships. Section 3.2.2 of the EIS notes that access to Indigenous Knowledge is a privilege and must be respected. Prior to sharing and collecting IK, local protocols and procedures developed by the Indigenous COIs for the management of IK were requested and applied. For some communities, this meant Indigenous Knowledge was shared with Denison and its consultants for use in the EIS with measures in place to protect the privacy of the IK, and in others communities consented to reports being shared and appended to the EIS itself. Denison will continue to work with the Indigenous COIs to ensure this information is shared and protected in manner consistent with community protocols.  Noted, the use of 'complimentary' and 'complementary' will be revisited throughout the EIS.	Section 5 was updated (re: complimentary vs complementary)	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Denison acknowledges that cumulative effects are important to Indigenous communities in section 5.9.3. For many Indigenous communities and governments, cumulative effects analysis requires an assessment this includes pre-development conditions to understand the impacts of past and existing activities that continue to affect the context for environmental and social systems. Considering the fuller context of historic change during an EA is an evolving best practice and is recognized through numerous Canadian cumulative effects assessment initiatives and management frameworks (e.g., Indigenous Centre for Cumulative Effects) and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process). Recommendations: - Denison needs to provide further detail on what projects and	MN-S Public Comments (March 4, 2023) (Public Comment #468)	With respect to review comment i) the following is noted. Section 5.9.2 of the draft EIS provides an overview of other Projects and activities that were considered present and reasonably foreseeable and could be a source of residual effects that could interact with the Project-specific residual effects. A preliminary list of projects and activities for potential consideration in the VC-specific cumulative effects assessment for the Project was provided in Table 5.9-1 of the draft EIS and their locations were shown relative to the Project site in Figure 5.9-1. Per Section 5.9.2.1 of the draft EIS, the original (or "preliminary") list of Projects and activities was scrutinized relative to various screening criteria to identify those present and reasonably foreseeable Projects and activities that were likely to interact with the Project VC in cumulative manner. It was this subset of Projects and activities that was carried forward into the cumulative effects assessment as described in Section 5.9.2.1.1 of the draft EIS.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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		activities were considered in the cumulative effects i.e., table listing projects. - Denison needs to provide further detail on how it considers cumulative effects important to Indigenous communities and whether it includes an evaluation of changes to pre- development conditions as is being done as practice in other environmental assessments. This would allow Indigenous communities to better understand the ongoing impacts of past and existing activities that continue to affect Indigenous cultural use of lands and resources.		With respect to comment ii) the following is noted. The Wheeler River Project EIS is subject the Canadian Environmental Assessment Act, 2012. In this assessment framework, the Project-specific cumulative effects assessment (CEA) considers whether residual adverse effects of the Project on a given VC will overlap spatially and/or temporally with residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. The CEA follows standard methodology as per provincial (e.g., Guidelines for an Environmental Assessment [Government of Saskatchewan 2022]) and federal guidance (e.g., Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 [Government of Canada 2019]). As noted in the IR, Section 5.9.3 of the draft EIS describes how Denison considers the cumulative effects assessment to be important to Indigenous peoples. As noted, the cumulative effects assessment is important to Indigenous communities because incremental effects to the environment can weaken resource economies, affect important resources such as plants, fish, and wildlife, affect rights-based and cultural activities, and affect both the health of wildlife and humans. Denison also noted and acknowledged the important relationship of the Indigenous Communities of Interest to the lands and waters in the Project study areas and sought out information from Indigenous Communities of Interest (ERFN and the Kineepik Métis Local #9 at Pinehouse (KML)) with respect to their Indigenous Knowledge on past, present, and predicted cumulative effects. Denison believes that the cumulative effects assessment does appropriately consider changes to pre-development conditions.  References Government of Canada. 2019. Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012. <a href="https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-ceaa2012.html">https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-ceaa2012.html</a> . Government of Saskatchewan. 2022. Guidelines for an Environmental Assessment. <a href="https://www.saskatchewan.ca/business/environmental-protection-and-sustainability/environmental-assessment/does-my-project-need-an-environmental-assessment">https://www.saskatchewan.ca/business/environmental-protection-and-sustainability/environmental-assessment/does-my-project-need-an-environmental-assessment</a> .				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Key waterbodies are inconsistently named on the maps/figures throughout Section 8.0 Aquatic Environment. Key waterbodies include those considered as reference or exposure waterbodies, and any others of importance to NR2 and NR3 Locals. Recommendations: - Denison needs to revise maps/figures to include labels for key waterbodies referenced in the EIS, particularly for figures included in section 8. - Denison needs to ensure waterbodies are named consistently throughout section 8.0 Aquatic Environment.	MN-S Public Comments (March 4, 2023) (Public Comment #472)	Acknowledged. Denison will update all maps/figures throughout Section 8 in the final EIS to more consistently include lake names.	Denison will update all maps/figures throughout Section 8 in the final EIS to more consistently include lake names.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Not all fishing and hunting activities are documented. Currently, the MKS has not been completed and therefore this assumption may be incorrect. Recommendations: - Denison needs to revise the fish and fish habitat section as part of the inclusion and consideration of the MKS in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public	The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment	This has not been identified as an outstanding issue by the MN-S in its	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as

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		- Denison needs to include additional information in the Final EIS that describes data limitations. A conservative approach would consider all waterbodies in the area to be potential fishing waterbodies for current and future use purposes.	Comment #473)	<p>EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.</p> <p>While Denison acknowledges the comment regarding what it perceives as a desire to include more regional data regarding fishing waterbodies of interest to MN-S within the context of cumulative effects, it believes the draft EIS and supporting documentation (including the aquatic environment baseline report, Appendix 8-D) provide a spatially extensive and appropriate description of fish habitat and fish resources in water bodies and water courses to assess potential cumulative effects given the spatial extent of Project interactions with the environment. For the purpose of a Project-specific CEA a cumulative effect can only exist when a residual Project effect overlaps in time and space with other current or reasonably foreseeable projects / activities. Where no such overlap exists, it is beyond the scope of a Project-specific CEA.</p>	from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	correspondence dated March 31, 2025.		needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>Russell Lake is not identified as a location to monitor fish health. Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to include Russell Lake in the aquatic monitoring program as cumulative effects from the Key Lake operation will be detected in this waterbody and this is an important local fisheries resource waterbody.</li><li>- Denison should commit to involving MN-S, NR1 and NR3 in the development of management and monitoring plans for the aquatic environment in the Final EIS.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #474)	<p>As indicated in the review comment, Russell Lake was not specifically referenced as a location to monitor fish health. This would be based on the draft EIS conclusion that environmental change that might affect fish health (e.g., water quality) would not extend beyond the LSA and into Russell Lake. This however does not preclude incorporating Russell Lake into follow up monitoring based on alternative rationale. Specific details for follow up monitoring program design have yet to be developed and the appropriateness / suitability of sampling areas (including Russell Lake) will be evaluated through that process. Such determinations as to the appropriateness of sampling areas to be utilized for follow up monitoring for the aquatic environment will be made when that monitoring program / plan documentation is developed and would be subject to discussion with Interested Parties. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p> <p>For further reference the following provides an overview of the information presented in the draft EIS and its supporting documentation regarding Russel Lake. Aquatic baseline surveys were conducted at two stations (LAB-1 and</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				<p>LAB-2) in Russell Lake and were considered ‘far-field’ stations in relation to the proposed mining plan for the Wheeler River Project. Data collection methods and results are presented in the draft EIS throughout the applicable subsections of Section 8.</p> <ul style="list-style-type: none"><li>• Section 8.2 details the Surface Water Quality methods and results,</li><li>• Sections 8.3 and 8.5 detail fish habitat, community, and health methods and results; and</li><li>• Section 8.4 details sediment quality and benthic invertebrate community and chemistry methods and results.</li></ul> <p>A breakdown of where specific processes and results are located for each of these components is presented below:</p> <p>Surface Water Quality/Chemistry: Surface Water Quality was sampled in Russell Lake. Methods and metrics are presented in Section 8.2.3.1. Water was sampled in Russell Lake and presented in Table 8.2-2 (Pages 8-60 to 8-62) of Section 8.2.3.3 of the EIS report, and summarized in Table 8.2-4. Surface Water predicted maximum Constituents of Potential Concern for the Russell Lake Inlet (LAB-1) are presented in Table 8.2-13 of Section 8.2.4.2.4. Cumulative effects are also assessed in Section 8.2.7. Detailed baseline summary data is presented in Appendix 8-D of the report in Table 3-3.</p> <p>Sediment Quality/Chemistry: Sediment was sampled in Russell Lake, and the sample methodology is presented in Section 8.4.3.1. Sediment grain size results are summarized in Table 8.4-2 in Section 8.4.3.2.1, and full data is presented in Appendix 8-D, Table 3-4. Sediment chemistry was summarized in Table 8.4-3, and full data is in Appendix 8-D, Table 3-5.</p> <p>Fish Habitat, Tissue Chemistry, and Community: Russell lake is not clearly indicated in the initial list of sample areas presented in Section 8.3.3 or Section 8.5.3; however, habitat information is presented in the Fish Habitat table (Table 8.3-4) of Section 8.3.3.2, and both Russell Lake sample locations (LAB-1 and LAB-2) and their associated fish community data are presented in the fish community map (Figure 8.3-6). Fish community and information is also presented in Table 8.3-4. Baseline fish community information is presented in Appendix 8-D of the report in Table 3-9. Fish chemistry summary data (Mean, Max, Min) for Northern Pike and White Sucker bone and tissue samples is presented in Table 8.5-2 of Section 8.5.3 of the Draft EIS. Detailed fish tissue data summary is presented in Appendix 8-D of the report in Table 3-10.</p> <p>Benthic Invertebrate Chemistry and Community: Benthic invertebrates were sampled in Russell Lake, and the sample methodology is presented in Section 8.4.3.1. Benthic invertebrate endpoints are summarized in Table 8.4-4 of Section 8.4.3.2.4, and benthic invertebrate chemistry is summarized in Table 8.4-5. Detailed baseline benthic invertebrate community and chemistry data is presented in Appendix 8-D of the report in Table 3-8, and community data in Tables 3-7A to 3-7D.</p> <p>Also, refer to Cumulative Effects sections within each part of the Aquatic Environment assessment in the draft EIS for a discussion of potential</p>				

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				cumulative effects in Russell Lake. (i.e., Section 8.2.7 for surface water quality; Section 8.3.7 for fish and fish habitat, 8.4.7 for sediment quality and benthic invertebrates, and 8.5.7 for fish health).				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	It is unclear whether there is a physical barrier between Whitefish Lake North and Whitefish Lake South that would allow Whitefish Lake North to be considered as an appropriate reference area for monitoring fish health. Recommendations: - Denison needs to clarify in the Final EIS on an appropriate reference area for monitoring fish health. - Denison needs to confirm fish movements between Whitefish Lake North and Whitefish Lake South and that Whitefish Lake North will be an appropriate reference lake. If it is not appropriate, then another reference lake such as Kochichowsky Lake may need to be considered for monitoring fish health.	MN-S Public Comments (March 4, 2023) (Public Comment #476)	To clarify, there is no physical barrier between the north and south portions of Whitefish Lake.  As indicated in the review comment the north basin of Whitefish Lake was suggested in the EIS as a potential upstream or reference monitoring for aquatic environment endpoints, including those related to fish health. Specific details for follow up monitoring program design have yet to be developed and the appropriateness / suitability of sampling areas will be evaluated through that process. The north basin of Whitefish Lake is the most proximal aquatic feature upstream of where treated effluent would be discharged and in that regard is a good candidate as a reference or non-influenced area. It is understood that proximity is not the only consideration as to the suitability of an area to be utilized as a reference area - as indicated in the review comment fish movement and mobility between sampling areas is also an important consideration since it is necessary to make comparisons, in the case of fish health, between / among independent fish populations. Such determinations as to the appropriateness of sampling areas to be utilized for follow up monitoring for the aquatic environment will be made when that monitoring program / plan documentation is developed and would be subject to discussion with Interested Parties.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The terrestrial RSA seems small in consideration of woodland caribou and determining the impacts of the Project in association with the SK1 caribou population. Recommendations: - Denison needs to evaluate the terrestrial RSA as it relates to the SK1 caribou population and Environment Canada’s woodland caribou management plan. Provide a detailed explanation in the Final EIS as to how the terrestrial RSA was determined.	MN-S Public Comments (March 4, 2023) (Public Comment #477)	The Project Area was delineated to capture all direct, and most indirect, likely adverse effects on caribou; as this is the zone of influence most likely to affect caribou in the vicinity of the Project (i.e., in the vicinity of human activity, equipment use and vehicle use). The Project Area (169.6 ha) is the direct footprint of proposed Project infrastructure (74.8 ha) with a buffer applied, thereby representing the area of maximum physical disturbance. The Project Area is not VC-specific, but consistent throughout the EIS.  The Wildlife LSA was designed to capture the majority of the Project effects. The LSA extends beyond Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. That is the primary rationale for selection of the spatial extent of the LSA – Denison believes this is an appropriate spatial scale that applies broadly to the wildlife VCs as a whole given the perceived mechanism of VC-Project interaction.  Importantly, as noted in draft EIS Section 9.3.6.4, in the caribou assessment, the Project Area had a 500 m buffer applied to account for indirect effects/habitat alteration; this area is within the wildlife LSA (refer to Figure 9.3-14 for a map showing the spatial areas). The 500 m buffer for habitat alteration for caribou was selected in accordance with ECCC’s (2020) assessment of disturbed areas, which buffered (500 m) anthropogenic disturbances to evaluate woodland caribou habitat. The alteration of available woodland caribou habitat is quantified in this EIS by applying a buffer of 500 m around the Project Area in which Project effects in the form of sensory disturbance are likely to affect available woodland caribou habitat and make it	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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				<p>functionally unavailable for use.</p> <p>Boreal caribou occur as one continuous population across the SK1 range, including within the Terrestrial RSA. It was decided to not use the entire SK1 range as an assessment area (e.g., due to the dilution factor) and instead use the Terrestrial RSA to appropriately and adequately assess residual and cumulative effects in proportion to the Project. It was deemed to be not feasible to use a large area like the SK1 range to assess residual Project effects because this would provide inappropriate context or "dilute" the adverse effects of the Project on the caribou that have a home range that overlaps with the RSA.</p> <p>The reviewer is also referred to the response provided to Information Requirement (IR) No. 137 from the Federal Indigenous Review Team (FIRT).</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>There is inadequate evaluation of the combined impact of all of these changes in vegetation on the terrestrial ecosystem. It is unclear whether there will be any short-term or long-term impacts on the overall health of the terrestrial ecosystem due to the individual changes to the terrestrial components.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to provide in the Final EIS an assessment of the cumulative impacts of all of the individual changes to the vegetation (e.g., change in vegetation types, a change in the COPC levels in vegetation and a change in wetland composition) on the entire terrestrial ecosystem.</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #479)	<p>The assessment of potential Project related effects on the vegetation VCs followed standard assessment methodology using specific KIs and associated MPs. There is no practical, reliable way to combine all of the various KIs and associated MPs into a single, combined expression of potential effects as suggested by the review comment. The standard approach and practice is that each VC is evaluated independently using the KIs and associated MPs, setting appropriately conservative effects thresholds.</p> <p>As outlined in draft EIS Section 9.2.7.4, the residual effects of the Project, in conjunction with the comparable residual effects from past, present, and reasonably foreseeable future projects on the vegetation abundance and constituent concentrations in vegetation KIs were predicted to be not significant. Thus, the cumulative effects are not expected to alter the integrity of the Vegetation and Ecosystems VC (i.e., it remains sustainable and available to contribute to ecological functions) and is predicted to be not significant. Similarly, the residual effects of the Project, in conjunction with the comparable residual effects from past, present, and reasonably foreseeable future projects on the listed plant species and wetlands KIs were predicted to be not significant. Thus, the cumulative effects are not expected to alter the integrity of the Listed Plant Species VC and Wetlands VC (i.e., they remain sustainable and available to contribute to ecological functions) and are predicted to be not significant.</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The EA assumptions for moose harvest numbers and success are based on the SK database information which includes information for hunters in the southern portion of the province and for non-Indigenous peoples. Reliance on draw licences to support Project models does not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. Métis do not participate in the draw system as they are recognized rights holders.</p> <p>Indigenous and non-Indigenous hunters have different hunting patterns. Although the data used in the EA is accurate for non-Indigenous hunters, this data should be used cautiously when assessing a project that is in an area where there is mostly (if not all) Indigenous hunters for moose and other ungulates.</p> <p>Recommendations:</p>	MN-S Public Comments (March 4, 2023) (Public Comment #480)	<p>With respect to bullet #1 the following is noted. Denison can confirm that the information provided in Section 9.3 (as well as 11.1) of the Draft EIS related to moose harvest data is based on the information that was publicly available from the Saskatchewan Ministry of Environment to contextualize moose harvest in the province and did not include specific harvest information from Indigenous sources as this was not available at the time. The final version of the EIS will provide further clarification as to the source of the moose harvest data, and that specifically it was obtained via the publicly available data regarding draw licenses.</p> <p>With respect to bullet #2 the following is noted. The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<ul style="list-style-type: none"><li>- Denison needs to provide confirmation that the assumption that moose harvest information used in the Draft EIS is based on the SK database which includes information for hunters in the southern portion of the province and for non- Indigenous peoples. If yes:<ul style="list-style-type: none"><li>o Denison to acknowledge in the Final EIS that the Terrestrial Ecosystem Effects Assessment relied on draw licences to support assessment conclusions and these conclusions do not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. In addition, Denison to note Métis do not participate in the draw system as they are recognized rights holders in the Final EIS.</li></ul></li><li>- Denison needs to incorporate Métis Knowledge from the MKS to the Project’s Terrestrial Ecosystems Effects Assessment.</li><li>- Denison to co-develop and implement a moose-specific monitoring and management plan with the Métis.</li><li>- Denison needs to include Métis harvesting patterns in the Final EIS (e.g., rabbit, moose, caribou, fox etc.).</li></ul>		<p>Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.</p> <p>With respect to bullet #3 the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3, is committed to such engagement with respect to monitoring. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p> <p>With respect to bullet #4 the following is noted. The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives (including harvesting) into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for	The nature of vegetation regeneration on an altered landscape can have continuing effects on woodland caribou. This conclusion is sufficiently vague and assume regeneration will be suitable for	MN-S Public Comments (March 4,	With respect to bullet #1 the following is noted. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development,	Denison continues to engage with the MN-S at their direction,	This has not been identified as an	As per MN-S letter dated	Denison remains willing to

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
	traditional purposes; Other	woodland caribou. Denison does not provide information on the removal and decommissioning of the roads built for the Project or the extension of the transmission line in the Draft EIS. Linear disturbances like these are incredibly impactful to Métis traditional land use in and around the Project. Recommendations: - Denison needs to identify how it will be determined that post-decommissioning revegetated habitat will be suitable for woodland caribou including any risk assessments completed to confirm the predictions. - Denison needs to involve MN-S as well as NR1 and NR3 Locals in decommissioning planning, mitigation, and monitoring. - Denison to provide further information on the removal and decommissioning of roads built for the Project and the extension of the transmission line built by SaskPower in the Final EIS.	2023) (Public Comment #481)	<p>including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. Consistent with this approach / process, the expectation is that restoration goals will be defined, the activities to be implemented to meet these goals will be defined and performance criteria to confirm that the goals are being / have been reached will also be defined. It is also noted that Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) during discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. As noted at this time the Plan is conceptual in nature but will go hand in hand with, and evolve with the decommissioning plan over time. Since the boreal caribou range plan for SK-1 is under development, it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan at this time is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work with ENV to meet the management objectives and management strategies for the SK1 range.</p> <p>With respect to bullet #2 the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.</p> <p>With respect to bullet #3 the following is noted. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. With the context of the evolution of the decommissioning plan for the site, the plans for removal and decommissioning of roads built for the Project and the transmission line will de developed as part of that process.</p>	inclusive of engagement in NR1 and NR3.	outstanding issue by the MN-S in its correspondence dated March 31, 2025.	March 31, 2025	engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Changes in the numbers of prey and/or predators during the post-decommissioning period could impact what animals are available for harvesting by the MN- S in the long-term. Recommendations: - Denison needs to clarify and confirm the duration of the habitat changes that may interfere with predator/prey densities including any risk assessments completed to confirm the predictions. - Denison needs to involve MN-S, as well as NR1 and NR3 Locals in decommissioning planning, mitigation, and monitoring.	MN-S Public Comments (March 4, 2023) (Public Comment #482)	With respect to bullet #1 the following is noted. Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. Plans for the post-decommissioning phase, including land restoration are at the conceptual stage and will evolve over time. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				<p>will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed and specifics as to what the post-decommissioning landscape will entail and the wildlife it would support as referenced in the review question will be developed. It is also noted that Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) based on discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. The Plan is conceptual in nature but will go hand in hand with, and evolve with the decommissioning plan over time. Since the boreal caribou range plan for SK-1 is under development, it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan at this time is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work with ENV to meet the management objectives and management strategies for the SK1 range.</p> <p>With respect to bullet #2 the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	A wildlife monitoring plan and a Woodland Caribou Management Plan are important tools for managing caribou in the short and long-term. Recommendations: - Denison needs to involve MN-S as well as NR1 and NR3 Locals in the creation of the Woodland Caribou Management Plan, and include the plan in the Final EIS	MN-S Public Comments (March 4, 2023) (Public Comment #483)	Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) based on discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. As noted the Plan is conceptual in nature at this time, largely because of the absence of range plan priorities. Denison is committed to continue to work with ENV to meet the management objectives and management strategies for the SK1 range as the boreal caribou range plan for SK-1 is developed. The Plan is a living document and will evolve over time as more information becomes available. In this regard, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The woodland caribou may not return to the Project area for up to 20 years following post-decommissioning due to available food resources. This may have an impact on long-term harvesting of woodland caribou by the MN-S. Recommendations: - Denison needs to clarify and confirm the duration of the habitat changes that may interfere with predator/prey densities including any risk assessments completed to confirm the predictions.	MN-S Public Comments (March 4, 2023) (Public Comment #484)	Denison acknowledges the comment and notes the following. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan. The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				<p>inform the development and implementation of appropriate mitigation measures related to caribou and their habitat.</p> <p>The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and regulators. As noted above, the boreal caribou range plan for SK-1 is under development and it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work with the province to meet the management objectives and management strategies for the SK1 range.</p> <p>Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes. SK ENV will engage with Indigenous communities and nations as the province develops and refines the range management plan for SK1.</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The 5% threshold disturbance is for a viable population which is the SK1 population.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to provide confirmation that the Final EIS appropriately used the Environment Canada threshold values on the woodland caribou population as they relate to the SK1 population.</li><li>- Denison needs to confirm that the RSA and threshold is suitable in areal extent. See comment 9-001.</li><li>- Denison needs to commit to re-evaluating their woodland caribou information in the Final EIS. Specifically, to ensure the woodland caribou information used by Denison is in alignment with the SK1 Range Plan being developed by the Province.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #485)	<p>In terms of the woodland caribou population in SK1, the likelihood of self-sustainability for the Boreal Shield range (SK1) has been updated from “unknown” (EC 2012) to “likely” in the amended recovery strategy (ECCC 2020). The SK1 range comprises more than 18,000,000 ha and is characterized by high fire disturbance and low anthropogenic disturbance (ECCC 2020). For SK1, the amended recovery strategy (ECCC 2020) identifies 40% undisturbed habitat in the range as the disturbance management threshold, which provides a measurable probability (71%) for the local population to be self-sustaining. This threshold is considered a minimum threshold because at 40% undisturbed habitat there remains a risk (29%) that the SK1 local population cannot be self-sustaining. According to ECCC (2020) disturbed habitat is habitat showing: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). In contrast, according to ECCC (2020) undisturbed habitat is habitat not showing any: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). The cumulative effects assessment in the draft EIS showed that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS).</p> <p>Specific to woodland caribou, the draft EIS evaluated and assessed potential Project-related effects on the boreal population of woodland caribou following standard environmental assessment (EA) methodology. The assessment of potential effects considered both direct (i.e., habitat loss) and indirect effects (i.e., habitat alteration) on caribou and their habitat, while assuming that caribou were present year-round and during all of their life stages (i.e., calving, rearing, mating, over wintering). The rationale for the definition of study areas</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				<p>for the purpose of the assessment of the Terrestrial Environment valued components (VCs) is described in Section 9.1.1 of the draft EIS. The Project Area (169 ha or 1.69 km<sup>2</sup>) and LSA were delineated based on the expected extent of potential direct (footprint) and indirect (sensory disturbance) Project effects; whereas, the RSA considered an 8 km buffer around the Project Area to provide an appropriate spatial scale upon which potential Project effects could be evaluated at the landscape scale where key Terrestrial Environment VCs reside and move within and upon which cumulative effects could be assessed. Boreal caribou occur as one continuous population across the SK1 range (18,034,870 ha), including within the Terrestrial RSA. After consideration, it was decided by Denison and its Subject Matter Experts at EDI Environmental Dynamics Inc. to use the Terrestrial RSA for the cumulative effects assessment for caribou rather than the entire SK1 range. This decision was made largely on the basis that it would not be feasible / appropriate to use a such large area like the SK1 range to assess cumulative effects since consideration of such a large spatial extent would likely "dilute" the contribution of the Project to potential effects at that scale. In support of this decision, comparison of the Project-specific habitat effects (i.e., the Project Area plus a 500 m buffer to account for sensory disturbance) relative to the scale of the SK1 range (as the applicable management unit for portion of the woodland caribou population that uses the Terrestrial RSA) was made. The comparison indicated that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS). As can be seen, the default conclusion at the range scale could only be that the Project does not contribute to cumulative effects at a practical measurable level.</p> <p>Denison and its SMEs believe the EIS took a precautionary or conservative approach to understanding/addressing the likely residual effects (i.e., effects remaining after mitigation measures were considered) of the Project on caribou and their habitat. This approach provides is appropriate as a planning tool to inform/support future Project-related regulatory approvals processes and to guide the scope and nature of follow-up monitoring. After consideration of measures to avoid and mitigate the potential for effects on caribou and their habitat it was concluded that the likely residual effects of the Project on caribou and their habitat were not significant.</p> <p>While the EIS did not consider specific additional opportunities to offset the non-significant effects, Denison has been working to develop a Conceptual Caribou Mitigation Plan. The plan was submitted to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan and Denison has been in close contact with the Saskatchewan Ministry of Environment (SK ENV), as stewards of woodland caribou from a regulatory perspective.</p> <p>References: Environment and Climate Change Canada (ECCC). 2020. Amended Recovery Strategy for the Woodland Caribou (<i>Rangifer tarandus caribou</i>), Boreal Population, in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada, Ottawa. xiii + 143pp.</p>				



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Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Previous sections of the Draft EIS identified the development of the Woodland Caribou Management Plan. Recommendations: - Denison needs to confirm the preparation and inclusion of a Woodland Caribou Management Plan within this section of the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #486)	Denison acknowledges the comment and notes the following. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan. The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat. The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and regulators. As noted above, the boreal caribou range plan for SK-1 is under development and it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work with the province to meet the management objectives and management strategies for the SK1 range.  Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes. SK ENV will engage with Indigenous communities and nations as the province develops and refines the range management plan for SK1.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The EIS states: "The parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings." The correct name is “Métis Nation-Saskatchewan” (no “of”). Recommendations: - Denison needs to correctly reference Métis Nation-Saskatchewan throughout the Final EIS. - Denison needs to include in the Final EIS input from the Métis Knowledge Study and any changes in the selection of VCs and their characterization.	MN-S Public Comments (March 4, 2023) (Public Comment #488)	The EIS will be updated throughout to the correct name “Métis Nation-Saskatchewan” (no “of”).  At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time.  A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). Section 11 has been updated to reflect "MN-S."	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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				Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Many of the Project Phase/Activities listed would contribute to a change in the environmental setting for Indigenous land and resource users within the LSA. Interactions should be considered for temporary or longer-lasting aesthetics impact related to Project-related dust, lighting, noise, and visual disturbance. Recommendations: - Denison needs to revise Table 11.1-7 in the Final EIS to include the addition of interactions and effects analysis for “Perceived suitability of lands and resources therein” that considers Project-related construction and decommission impacts to Indigenous Land and Resource Use. For example, the development of access roads and site preparation during construction, and demolition and disposal of surface infrastructure during decommission, would likely result in some interaction with ILRU related to noise, dust, or traffic.	MN-S Public Comments (March 4, 2023) (Public Comment #489)	Table 11.1-7 will be revisited to include to the development of access roads and site preparation during construction, and demolition and disposal of surface infrastructure during decommission.	Table 11.1-7 has been updated.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Missing information to support the claim that other large terrestrial mammals, such as elk and white-tailed deer species, are not found in sufficient abundance in the LSA to be assessed as part the Project. Recommendations: - Denison needs to include additional information in the Final EIS on why large terrestrial mammals that are harvested in the LSA (such as elk and white-tailed deer) are not found in sufficient abundance in the LSA to support this conclusion.	MN-S Public Comments (March 4, 2023) (Public Comment #490)	Section 11.2.3.1.2 describes how other big game species, such as white-tailed deer or elk, are not hunted in WMZ 75 due to the absence or low abundance of these species.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The characterization of the EIS does not yet reflect MN-S and NR1 and NR3 Locals values or interests as this has not yet been provided. It is expected that when made available, this information will be reflected in the Final EIS. In the Draft EIS, Denison has proposed to develop mitigation measures and management planning, but has not begun engaging with Métis Community of Interest and MN-S on contents of mitigation measures or management plans. It is good practice for Communities of Interest, including Métis, to have the opportunity to contribute to the scoping, development, and implementation of mitigation measures and management plans (and monitoring programs), including effectiveness reviews and the application of an adaptive management approach. Arrangements and applicable funding for a Métis Knowledge study is underway but not yet incorporated in the assessment. Recommendations: - Denison needs to include in the Final EIS, information provided by Métis Locals in NR1 and NR3 on their perspectives on other land and resource use. - Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Métis Local #9 on potential Project-related effects to Métis traditional economy throughout	MN-S Public Comments (March 4, 2023) (Public Comment #491, #496, #503, #522, #531, #538)	A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.  As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). MN-S will be informed throughout the monitoring program design and implementation process (as described in Section 8).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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		the life of the Project. - Denison needs to include in the Final EIS, effects mitigation, and management and monitoring plans that were prepared with MN-S and NR1 and NR3 Locals involvement and agreement. - Denison, in the Final EIS, needs to incorporate the outcome of the Métis Knowledge Study.						
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	For many Indigenous communities and governments, cumulative effects analysis requires an assessment that includes pre-development conditions to understand the impacts of past and existing activities that continue to affect the context for environmental and social systems. An evolving best practice during an EA is to consider the fuller context of historic change. This practice is recognized through numerous Canadian cumulative effects assessment initiatives and management frameworks (e.g., Indigenous Centre for Cumulative Effects) and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process).	MN-S Public Comments (March 4, 2023) (Public Comment #493)	Noted.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The EA assumptions for big game numbers and success are based on the SK database information which includes information for hunters in the southern portion of the province and for non-Indigenous peoples. Reliance on draw licences to support Project models does not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. Métis do not participate in the draw system as they are recognized rights holders. Recommendations: - Denison to acknowledge in the Final EIS that the Terrestrial Ecosystem Effects Assessment relied on draw licences to support assessment conclusions and these conclusions do not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. In addition, Denison to note Métis do not participate in the draw system as they are recognized rights holders in the Final EIS. - Denison needs to incorporate Métis Knowledge from the MKS to the Project’s Terrestrial Ecosystems Effects Assessment.	MN-S Public Comments (March 4, 2023) (Public Comment #494)	Section 9.3.3.1.1 describes how the Project is located in WMZ 75, while WMZ 73, 74, and 76 are adjoining WMZ 75 (Figure 9.3 6). Between 2014 and 2020 (the years for which data are available), no draw licences were sold for any of these WMZ and, therefore, no associated harvest was reported to have occurred in the area based on draw licenses. While this breakdown to WMZ harvest numbers is not available for resident regular licences, it is assumed that most of the annual harvest through resident regular licences occurred in the southern part of the province.  A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	To characterize trends in wildlife harvesting it would be more appropriate to show a period longer than 1 year; at least 5 years where available. Recommendations: - Following best practices, Denison should include at least 5 years of data in the Final EIS for upland game bird harvest and harvest effort in Game Bird Management.	MN-S Public Comments (March 4, 2023) (Public Comment #495)	Temporal boundaries for characterizing components of the OLRU existing environment varied by topic. Commercial trapping and fishing data were presented based on the data available from the Province of Saskatchewan, and with multiple years of data presented where available. Other topics such as recreational fishing and hunting considered data where available, but in some instances is based on licensing quotas which do not always vary from year to year, or are based on self-reported outcomes. Specific to game bird harvesting, over 5 years of data is provided on annual grouse harvest (2014 to 2020) in Section 9.4.3, Table 9.4-3.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	This conclusion is not consistent with the methods detailed on page 5-30 in section 5.8 as the Draft EIS identifies noticeable residual effects related to traffic (increased traffic volume) and noise (low to moderate impact). These effects should be taken to residual effects assessment. Recommendations:	MN-S Public Comments (March 4, 2023) (Public	Potential Project disturbances considered under this pathway included increases in traffic, noise, air quality, modification of the wilderness experience, and increases in competition for resources. These disturbances will be most detectible in locations proximal to the Project site. Effects have the most potential to affect cabin leaseholders due to their use of ground travel, hunting and fishing activities, and general proximity to the Project. With	Section 11.2.5 describes the mitigation measures to reduce the impacts of traffic, noise, and others. Further mitigations for traffic are described in Section 12.3.5 in Section 12 and for noise	This has not been identified as an outstanding issue by the MN-S in its	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as

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		- To be consistent with the methods detailed in section 5.8, Denison should include all noticeable Project-related effects for residual effects assessment. For example, effects were identified related to traffic (increased traffic volume) and noise (low to moderate impact) but were not taken to residual effects assessment for Other Land and Resource Use in the Final EIS.	Comment #497)	the exception of dust which has proven mitigation strategies, the overall disturbances are negligible and there are a limited number of resource users who will experience them to any detectible degree. Therefore, this pathway is not carried forward for residual effects assessment. Section 11.2.5 describes the mitigation measures to reduce the impacts of traffic, noise, and others. Further mitigations for traffic are described in Section 12.3.5 in Section 12 and for noise are described in Section 6.2.5 in Section 6.	are described in Section 6.2.5 in Section 6.	correspondence dated March 31, 2025.		needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions	Interest was expressed in understanding the number and types of employment that would be created by the Project.	ROC 62	<p>Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Section 13 summarizes local, provincial, and federal Project benefits and Denison's approach to employment, training, and business participation opportunities for communities.</p> <p>Denison has estimated a workforce of 300 people for the two-year Construction period. Each component of Construction will require workers with different types of skills and training depending on the task (e.g., road construction, wellfield drilling, erection of buildings, connection to services). During Operation, over 180 people are expected to be employed to operate the ISR wellfield and processing plant, as well as provide various supporting activities such as security, camp operations, operation of the water treatment, sewage and potable water plants, environmental monitoring, and maintenance of roads, equipment, and buildings.</p>	Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions	Concern with racism and other factors in the workplace affecting employee retention and the need for the understanding of the Métis identity, their culture, and their values.	ROC 62	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy,	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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					the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.			
Métis Nation – Saskatchewan	Health and socio-economic conditions	Questions about radiation and how it would be monitored.	ROC 1 ROC 62	As stated in Section 2.9.1.3.2, A Radiation Protection Program would be designed and implemented so that Denison complies with, or exceeds, the level of radiation safety that is required by the relevant regulations pursuant to the Nuclear Safety and Control Act and Denison’s Health and Safety Policy. Activities within the program would include implementing a radiation code of practice, measuring and monitoring radiation on an ongoing basis, and reporting radiation testing results to regulators. As summarized in the Worker Health assessment (Section 10.2.3.2.10) potential residual effects to worker health during Construction and Operation are expected to be negligible given that the predicted radiation doses are less than the annual allowable effective dose of 20 mSv/yr, and radon is predicted to be within the range that is manageable under an RPP.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions	Denison’s EIS does not outline where hazardous waste will be taken for proper recycling or disposal. Recommendations: • Denison needs to share where hazardous waste will be taken for proper recycling and disposal with MN-S, NR1 Locals, and NR3 Locals	MN-S Public Comments (March 4, 2023) (Public Comment #441)	Waste management is described in Section 2.2.4 of the Draft EIS and includes discussion of all waste types that will be generated by Project-related activities. The following is noted in Section 2.2.4 for reference, "Conventional waste, radiologically contaminated waste, and hazardous waste will be managed at the Project. Denison is committed to conducting stringent waste characterization throughout the life of the Project. This includes physical, radiological, and chemical characterization to maintain accurate waste inventories and determine how wastes will be dispositioned through either re-use, recycling, temporary storage, or permanent disposal (on or off site). This includes clearance of material that meets unconditional release requirements and can be safely removed from site. A waste management program will be developed for the Project to support licensing and permitting. The waste management program and associated plans developed to support licensing will be based on the 4 R’s: Reduce, Reuse, Recycle, and Recover, and will detail how each type of waste generated on site will be managed. Resources used to develop the waste management program will include, but are not limited to, the CNSC’s REGDOC-2.11 series, related Canadian Standards Association (CSA) standards, and the Hazardous Substances and Waste Dangerous Goods Regulations (Government of Saskatchewan 2000)." Hazardous waste management in particular discussed in Section 2.2.4.4. of the Draft EIS where the following is noted, "Denison identified a need to have a small (250 m2) pad designated for temporary storage of hazardous waste such as paints, solvents, hydrocarbons, and used oil. The temporary storage pad will have a composite liner system (Figure 2.2 24). Hazardous wastes will be taken off site by waste management service providers for proper recycling as soon as practical." As referenced in the Draft EIS, the specific details related to hazardous waste management will be documented as part of the overall, waste management program that will be developed as the Project advances from the environmental assessment process into licensing and permitting. Hazardous	Section 2.2 describes how Denison is committed to conducting stringent waste characterization throughout the life of the Project. A waste management program will be developed for the Project to support licensing and permitting. Hazardous wastes will be managed consistent with regulatory requirements, using licensed third-party waste management/haulage providers and licensed waste management facilities. Denison will inform the MN-S and relevant locals when such documentation has been prepared through engagement mechanisms in place at that time.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				wastes will be managed consistent with regulatory requirements, using licensed third-party waste management/haulage providers and licensed waste management facilities. Denison will inform the MN-S and relevant locals when such documentation has been prepared through engagement mechanisms in place at that time.				
Métis Nation – Saskatchewan	Health and socio-economic conditions	<p>Denison has not identified Métis-specific considerations to their employment and training program. Denison has indicated that there will in-house training, as well. It is not clear how this will be delivered. Denison notes some jobs will require a Grade 12 education in addition to in- house training programs, but does not offer to support Métis peoples obtain Grade 12 education to access available positions. Terminology like “could” is a vague indicator of commitment to developing strategies to address training and support systems for workers. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to providing appropriate local resources for training and support as access to education and supports systems effects for residents of the LSA.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- MN-S would like confirmation on what kind of education and training support Denison will make available to maximize employment from Communities of Interest.</li><li>- Denison needs to support Métis training opportunities through Northlands College.</li><li>- MN-S would like additional details on which roles will need Grade 12, and how many roles are available for people without Grade 12.</li><li>- Denison needs to provide more detail within the Final EIS related to their role in developing and providing culturally appropriate resources for training, education and supports systems as access has already been identified as a barrier to local communities.</li><li>- Denison needs to support Métis training opportunities through Northlands College.</li><li>- Denison needs to provide more certainty and detail within the Final EIS related to local training and employment. More detail within the Final EIS related to Denison’s role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities. This includes training programs prepared with MN-S/NR1 and NR3 Locals involvement and agreement.</li><li>- More information is needed to understand Denison’s approach and commitment to addressing effects to local employment especially as it relates to Foundational positions and why a Grade 12 education is required.</li><li>-Denison needs to update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA.</li><li>- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to discuss employment and training opportunities for Métis (e.g., discussing Métis-specific recruitment strategies). Opportunities to</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #450, #509, #536)	<p>Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</p> <p>All positions at the Project will require a Grade 12 education or equivalent. Section 13.3.2.1 describes how foundational positions (i.e. entry level) require Grade 12 education and in-house training programs, although a combination of skills and experience may be considered. These positions would include process plant operators, site services, drillers, and catering/janitorial staff.</p> <p>Denison will update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA.</p> <p>Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.</p>	Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project (described in Section 13). Section 13 was updated to reflect the 2021 Census. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 as described in Section 4.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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		discuss include (but are not limited to): hiring and training practices during all phases of the Project, on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs.						
Métis Nation – Saskatchewan	Health and socio-economic conditions	Denison does not specify the goods and services during Construction, Operation, and Decommissioning. MN-S is interested in sharing potential goods and services opportunities for Métis peoples (e.g., chefs and artisans). Denison has not specified how it is transmitting knowledge nor provided an explanation of the procurement approach. Recommendations: - Denison needs to provide specific information on the goods and services opportunity available to Métis as per labour force and business analysis. - Denison needs to clarify how it has made MN-S, NR1, and NR3 Locals aware of the procurement approach and opportunities, and how it will keep them informed through the life of the Project.	MN-S Public Comments (March 4, 2023) (Public Comment #451)	Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan. This procurement approach may consider advance sharing of purchasing requirements of goods and services throughout all phases of the Project, efforts to increase the capacity and capabilities of businesses to increase successful bidding outcomes, and the development of a business registry.	Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan (as describe in Section 13).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions	No Emergency Preparedness and Response Program was available for review. Recommendations: - Denison needs to include an Emergency Preparedness and Response Program in the Final EIS for review. - Denison to include information on transportation accidents within the Emergency Preparedness and Response Program.	MN-S Public Comments (March 4, 2023) (Public Comment #453)	<p>With respect to Part i) of the comment the following is noted. The MN-S review comments accurately indicates that a draft Emergency Preparedness and Response Program was not included in the EIS submission; rather, Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP). The EPRP would be established to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. A such, the documentation referenced in the MN-S review comment will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S, and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate.</p> <p>With respect to Part ii) of the comment the following is noted. The EPRP will include information relevant to transportation accidents and responses thereof. Further, information regarding aspects of emergency response with respect to transportation accidents was provided in the draft EIS and direction to that information is highlighted as follows for reference. Postulated traffic accident scenarios were considered in the Accidents and Malfunctions Technical Supporting Document (TSD; Appendix 14-A) as summarized in Section 14 of the draft EIS. As mitigation for such scenarios the accidents and malfunctions assessment highlighted commitments to develop the EPRP and several plan and procedure level documents (e.g., spill response plan; an emergency response plan; a traffic and transportation plan; a travel</p>	Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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				<p>management plan; personnel training procedures). Additionally, Section 12.3 of the draft EIS discusses mitigation measures that will be implemented to reduce adverse traffic effects, as well as mitigation measures to be implemented to reduce adverse effects on emergency services capacity such as:</p> <ul style="list-style-type: none"><li>• All drivers serving the Project will receive appropriate training related to the nature of materials being transported, including driver training to the highest standards based on the transportation of nuclear substances.</li><li>• Vehicles transporting dangerous goods and/or hazardous products will display required placards and labels in accordance with provincial legislation and will follow designated highway corridors.</li><li>• All materials transported by truck will be compliant with any weight restrictions or permits, spring road restrictions, or geometric constraints set out by the Saskatchewan MOHI.</li><li>• Denison will maintain Project roads and the main access road to the site. First aid facilities will be supplied during construction.</li><li>• A primary care paramedic will be contracted to provide care on site through all phases of the Project. Denison will provide the appropriate amount of First Aid and CPR training to make sure employees have adequate coverage.</li><li>• Mandatory safety orientations will be held for contractors and workers.</li><li>• First aid personnel will provide transport to a hospital by air when required or by Saskatchewan’s air ambulances;</li><li>• Health and safety management programs will be developed for Construction, Operation, and Decommissioning.</li><li>• Workers will be trained in fuel handling, equipment maintenance, and fire prevention and response measures.</li><li>• Denison’s Environment, Health, Safety, and Sustainability Policy will be enforced.</li><li>• Continued liaison with LSA communities and relevant authorities (e.g., RCMP, health and service providers) will be undertaken to provide updates, discuss any Project-related concerns, and make sure that the required resources are in place.</li><li>• Project-specific contingency, emergency response, and spill prevention plans will be developed to reduce the likelihood and severity of accidents and potential fires.</li><li>• Based on the outcomes of discussions with COI, Denison may provide support and/or training to local emergency services to make sure that staff are adequately prepared in the unlikely event of an accident, malfunction, or spill on Highways 914 or 165. This may include the provision of specialty materials or equipment to deal with an emergency response.</li></ul>				
Métis Nation – Saskatchewan	Health and socio-economic conditions	<p>The safety of all Métis peoples that will be engaged or employed by the Project is of utmost importance. Racism towards Métis peoples will not be tolerated. Denison’s policies need to support a safe work culture for all.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to share all policies related to creating a safe workplace with MN-S, NR1 Locals, and NR3 Locals for review and comment (e.g., health and safety policies and the Workplace Violence &amp; Harassment Policy).</li><li>- Denison needs to create a culturally safe workplace for Métis</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #460)	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison’s website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison welcomes specific feedback on Métis interests and concerns. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison’s Environment, Health, Safety, and Sustainability Policy, the implementation of	Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison’s Environment, Health,	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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		peoples. - Denison needs to clarify its policies to prevent incidents of workplace violence and harassment and identify clear actions to address potential incidents of workplace violence and harassment. - Denison needs to mandate cultural awareness training for all employees to help with one the Project’s established principles: “approaching sustainability and engagement activities with the utmost respect for Indigenous communities, Indigenous Rights, and Indigenous Knowledge”.		culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.			
Métis Nation – Saskatchewan	Health and socio-economic conditions	Interactions with the Human Environment Valued Components should be consistent with interaction table in related technical VC assessment sections. Comments have been made for revision to some of the interaction table in related VCs. Recommendations: - Denison needs to update Table 5.6-2 be to be consistent with revised interaction tables for related VCs.	MN-S Public Comments (March 4, 2023) (Public Comment #465)	Acknowledged. Table 5.6-2, Summary Interaction Matrix for Valued Components in the Human Environment, will be cross-checked against the VC interactions tables related to the biophysical environment and updated for consistency in the final EIS, and in consideration of the comments provided by the reviewer on the individual biophysical environment VC interaction tables as noted.	Table 5.6-2 has been updated.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	The interaction table (12.2-5) identifies “Employment and Expenditures” as the only project component that would influence community well-being. This is inconsistent with previous interactions tables and information in the Draft EIS that identified potential interactions with the physical components and activities of the project that could affect aspects of community identity and cohesion (e.g., section 12.1 Cultural Expression). Comments were raised in the Draft EIS that community health and well- being is related to the relationship with the environment including issues such as changes in water quality or quantity, and mental health being affected by industrial development. Furthermore, section 12.2.3.3 (p. 12-66 to 12-73) identifies the natural environment as a component of community cohesion. This should be better reflected in the analysis of Community Well-being. Recommendations: - In the Final EIS, Table 12.2-5: Potential Project Interactions for Community Well-being (p. 12-74 to 12-77) should include the addition of interactions and effects analysis for “Change in Community Cohesion” that considers Project- related construction, operations, and decommission impacts to mental, physical, and cultural health that stem from a relationship with the environment.  This analysis does not address the concerns expressed in the existing conditions reporting (section 12.2.3, p. 12-47 to 12-50) related to mental and physical health being affected by quality of water and land is being affected by industrial developments. This should be better reflected in the analysis of Community Cohesion. Recommendations: - Denison needs to provide additional effects analysis of “Change in Community Cohesion” that considers Project- related construction,	MN-S Public Comments (March 4, 2023) (Public Comment #504, #514)	Denison acknowledges that there is an interrelationship between the two and for the purposes of the EIS ha been organized into separate sections. Section 11.1 provides an assessment on perceived suitability of lands and resources therein, along with human health. See Section 11.1.4, 11.1.5, and 11.1.6 for further information.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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		operations, and decommission impacts to mental, physical, and cultural health that stem from a relationship with the environment. For example, concerns were expressed in the Draft EIS reporting (section 12.2.3) related to mental and physical health being affected by quality of water and land is being affected by industrial developments.						
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>The EIS states: “Best efforts will be made to make sure employment is maximized, including within the LSA communities and to encourage business participation within the LSA.” (p. 12-80) “Best efforts will be made . . .” is a vague statement about project-related plans to maximize local training, employment, and procurement opportunities that would beneficially impact income levels for residents. More detail is needed to understand Denison's approach and commitment to increased personal income for residents of the LSA.</p> <p>“Community concerns” are identified related to broader spatial (having to move away to work) and temporal (“crash” after project) uncertainty for increased income. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to income for residents of the LSA.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation as well as supports for employee retention. More information is needed to understand Denison's approach and commitment to increased personal income for residents of the LSA</li><li>- Denison to expand the LSA communities to include all potentially impacted NR1 and NR3 Locals.</li><li>- Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation as well as supports for employee retention.</li></ul> <p>More information is needed to understand Denison's approach and commitment to addressing community concerns related to increased personal income for residents of the LSA.</p> <ul style="list-style-type: none"><li>- Decommissioning planning needs to consider employment transition in addition to site clean-up to avoid boom and bust scenarios.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #506, #507)	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.</p> <p>Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. The LSA for the assessment of the economy includes ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Pinehouse Lake, and Beauval. The RSA for the Economy VC is the Northern Saskatchewan Administrative District (Census Division 18), which is defined in The Northern Municipalities Act, 2010 (Government of Saskatchewan 2010). This area shares many economic and demographic characteristics with the LSA and is a relevant reference point.</p> <p>Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</p> <p>Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan. This procurement approach may consider advance sharing of purchasing requirements of goods and services throughout all phases of the Project, efforts to increase the capacity and capabilities of businesses to increase successful bidding outcomes, and the development of a business registry.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project (as described in Section 13).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic	“Community concerns” are identified related to impact to family and community cohesion due to working away from home for long periods. More detail is needed to understand Denison's approach	MN-S Public Comments (March 4,	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1	This has not been identified as an	As per MN-S letter dated	Denison remains willing to

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	conditions; Other	and commitment to addressing community concerns related to community and family cohesion effects for residents of the LSA. Recommendations: - Denison needs to provide more detail within the Final EIS related to worker rotation system mitigation. Particularly considering the identification of reported difficulty in balancing the demands of a worker rotation system with domestic commitments, and many local community members concern of being unable to achieve a work-life balance.	2023) (Public Comment #508)	the MN-S governs may be included as a COI and are recognized as such in the EIS.  Denison recognizes that both parents and members of the community/family could potentially be employed by the Project. Mitigation measures associated with potential effects to community cohesion and the commuter-rotation system are described in Section 12.1.5 and include: - Working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities, where practicable; - Implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation - Using a commuter rotation system has also shown to be effective in allowing Indigenous employees continued opportunities to spend time on the land, and important factor in the transmission of knowledge and language (see Section 11 for a description of potential effects to land use).  As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.	and NR3. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process.	outstanding issue by the MN-S in its correspondence dated March 31, 2025.	March 31, 2025	engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	This statement is vague about who will monitor community cohesion and whether Government departments and private-sector companies are committed to provide those services for the life of the Project. It also ignores previous statements in the Draft EIS that identify direct and indirect effects of uncertainty related to changes to community well-being that would be related to the Project. Denison's earlier statements indicate that monitoring and follow-up will be an aspect of mitigation. The statements seem contradictory. Recommendations: - Denison, in the Final EIS, needs to demonstrate that whether Government departments and private-sector companies are committed to provide community cohesion- related services for the life of the Project. - Denison needs to distinguish and clarify earlier statements of monitoring and follow- up with the assertion here.	MN-S Public Comments (March 4, 2023) (Public Comment #516)	Denison is committed to implementing measures within its control and responsibilities (for example the EFAP and other measures). As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.  Monitoring of community cohesion at the community level is something Denison understands is for the Government to consider.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic	The 31% or 51% increase in truck traffic on Highway 914 seems to represent a more than slight increase in traffic volume. It is acknowledged that this is related to 18 additional trucks per day. Clarification is required to determine if there would be a similar %	MN-S Public Comments (March 4, 2023)	Denison believes it has fulfilled its information requirements for the EIS and supporting documentation as outlined in the EA guidance provided by the province and federal government. Notwithstanding that, Denison recognizes that further information will be required as the project moves through the EA	N/A	This has not been identified as an outstanding	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this

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	conditions; Other	increase in potential collisions. Recommendations: - Denison needs to clarify and provide analysis of the impact of traffic volume and what is a suitable threshold.	(Public Comment #518)	and licensing / permitting processes. Denison will work with the province to identify and scope additional information requirements.		issue by the MN-S in its correspondence dated March 31, 2025.		topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Clarity is required to explain why collisions can not be predicted with accuracy given the availability of existing predictive modelling for traffic management planning. Recommendations: - Denison should provide further clarification in the Final EIS of why collisions can not be predicted with accuracy given the availability of existing predictive modelling for traffic management planning.	MN-S Public Comments (March 4, 2023) (Public Comment #519)	<p>To clarify, the text in Section 12.3.4.2.1. should have more specifically referenced accident rates as part the discussion of an increase in the number of collisions due to the Project. Overall, it is expected that accident rates will not be affected by the incremental increase in traffic associated with the Project. Traffic volume is a poor predictor of accident rates on relatively well traveled roads - that is, the accident rate does not show a direct relationship with traffic volume and is relatively consistent in this case. Extrapolating existing accident rates and specifically applying them to the Projects related traffic would can provide some insight but it is understood that such extrapolation would be very conservative and overestimate the actual level of risk. Accident statistics are inclusive of all manner of accidents, the majority of which are single vehicle accidents that do not result in significant harm to people or property. Moreover, it would be expected that the likelihood of Project-related traffic accidents would occur at lower rates than those attributed to the general public based on the mitigations described in the draft EIS (Section 12.3.5) including: all drivers serving the Project will receive appropriate training related to the nature of materials being transported, including driver training to the highest standards based on the transportation of nuclear substances; vehicles transporting dangerous goods and/or hazardous products will display required placards and labels in accordance with provincial legislation and will follow designated highway corridors; an Emergency Response Plan will be developed in case there is a spill during the transportation of dangerous goods and/or hazardous products; and all, materials transported by truck will be compliant with any weight restrictions or permits, spring road restrictions, or geometric constraints set out by the Saskatchewan MOHI.</p> <p>The above notwithstanding, Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward and as the Program / Plan / Procedure documentation is developed during licensing since elements of this documentation directly align with management of the aforementioned concerns (e.g., emergency response planning, transportation management planning).</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Clarification is required to explain how Denison intends to provide employee maintenance support services that address the indirect effect to the community members (e.g., childcare, etc.) identified in this statement. Recommendations: - Denison to provide in the Final EIS additional detail on commitments to support employee families while on rotation.	MN-S Public Comments (March 4, 2023) (Public Comment #520)	Section 12.3.5 describes the mitigation measures applicable to community infrastructure and services within the LSA communities, the following mitigation measures will be implemented to reduce adverse effects: (1) Services and programs will be provided on-site and will be accessible to workers. These services and programs may alleviate pressures on social and health services within LSA communities. (2) An EFAP will be part of each worker's benefits package and will provide supports to individuals and their families that may not be readily available in the communities. Employee and family assistance programs typically provide free assessments, short-term counselling, referrals, and follow-ups to employees and their family members who are having personal or work-related	Section 12.3.5 describes the mitigation measures applicable to community infrastructure and services within the LSA communities.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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				problems. Generally, EFAPs can be accessed remotely by workers and their immediate family. Denison will aim to educate their staff on the offerings of their EFAPs, as well as making that information shareable with individuals' families.				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>Most of the mitigations provided are standard worker health and safety and materials handling measures required for worker and environmental safety and don't address potential effects to traffic within the LSA. Detail is required to demonstrate how measures will address potential hazards from increased traffic volumes, and potential risk for conflict between road users and mining traffic. Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to provide additional information in the Final EIS on how the mitigation will alleviate traffic related impacts.</li> <li>- Denison needs to engage all potentially impacted Métis, including: MN-S, NR1 Locals, and NR3 Locals, in addition to Kineepik Métis Local #9, as an Indigenous Community of Interest throughout the life of the Project.</li> <li>- Denison needs to revise their Indigenous Community of Interest definition in the Final EIS to reflect the uniqueness of Métis governance structures. Specifically, a definition that recognizes Métis Locals proximate to the Project, MN-S, and MN-S regional leadership.</li> <li>- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals, to understand their preferred level of involvement throughout the life of the Project.</li> <li>- Denison needs to acknowledge MN-S, NR1 Locals, and NR3 Locals as an Indigenous Community of Interest in the Final EIS.</li> <li>- Denison needs to revise the Final EIS Executive Summary to note that the Project falls within the Homeland of MN-S, NR1 Locals, and NR3 Locals. Denison needs to apply this change throughout the EIS, where applicable.</li> <li>- Denison to acknowledge that lease review data is not an appropriate way to determine Métis traditional resource use in and around the Project in the Final EIS.</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #524)	Denison believes the mitigations it has outlined for transportation management (and associated risks thereof) as detailed in the draft EIS (Section 12.3.5, Section 14, Appendix 14-A) are reasonable and practical measures it can take to manage it's Project activities. It is acknowledged that the information provided in the EIS and its supporting documentation is presented at a planning level; however, this level of detail is appropriate at this stage of Project development. Further details as to how these mitigations will be implemented will be developed during the licensing / permitting phase and will be available for review at that time, rather than as part of the final EIS. Further to this, and as noted elsewhere, Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward and as the Program / Plan / Procedure documentation is developed during licensing since elements of this documentation directly align with management of the aforementioned concerns (e.g., emergency response planning, transportation management planning). Mitigations in Section 12.3.5 also require Denison truck traffic to slow to 40 km/hr for a minimum of 2.5 km on either side of the culture camp(s) in which are understood to occur in September and October (dates may be adjusted at the communities' direction). Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to mitigation measures and monitoring plans.	See mitigations in Section 12.3.5	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>This section of the draft EIS states: "Residents in the LSA and Regional Study Area (RSA) have expressed interest and concern about the Project's effect on the local economy, through income, training and employment opportunities, and business opportunities. Denison has not sufficiently engaged MN-S, NR1 communities, and NR3 communities on the assessment of the Economics VC.</p> <p>Initial direction and input into VC selection was obtained from:</p> <ul style="list-style-type: none"> <li>• discussions with Indigenous and non-Indigenous Communities of Interest (COI);</li> <li>• discussions with LK holders;</li> <li>• discussions with government agencies and the public;</li> <li>• results of Denison's baseline studies;</li> <li>• regional data from other EAs;</li> <li>• results from engagement and consultation activity; and</li> <li>• similar or recent projects in the region." (p. 13-5 to 13-6)</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #525, #528)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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		<p>Recommendations:</p> <ul style="list-style-type: none"> <li>• In the Final EIS, Denison needs to include the input from MN-S, NR1 Locals, NR3 Locals and indicate if VCs were altered.</li> <li>• Denison needs to meet with MN-S, NR1 Locals, and NR3 Locals to discuss Project- related economic issues and interests.</li> <li>• MN-S request additional detail is included within the Final EIS, on how the input provided by MN-S, NR1 Locals, and NR3 Locals will influence the assessment of the Economics VC.</li> </ul>						
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>Denison does not include MN-S or NR1 communities within the LSA in the assessment on the economy and therefore employment, training, and business opportunities will not be prioritized for all potentially impacted Métis. Potential Project interactions for the Economy VC do not reflect feedback shared by MN-S/NR1 and NR3 Locals. Denison has not assessed the participation rate, employment rate, or unemployment rate of MN-S or NR1 and NR3 communities.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison to include MN-S and all NR1 communities in the LSA for the economy VC in the Final EIS.</li> <li>- Denison needs to discuss potential Project interactions for economy to Métis peoples and update Table 13.3-1 to reflect feedback shared by MN-S/NR1 and NR3 Locals.</li> <li>- In the Final EIS, Denison needs to expand the description of the existing environment to include NR1 communities and NR3 communities.</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #529, #533, #534)	<p>Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI.</p> <p>Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	<p>The Draft EIS does not yet include Métis Knowledge from NR1 and NR 3 other than Kineepik. The Draft EIS does not include information on how Denison intends to include the outcome of the Métis Knowledge Study.</p> <p>Perspectives on cumulative impacts have only been considered for English River First Nation and Kineepik Métis. This has resulted in an absence of MN-S perspective regarding cumulative impacts within the Project and surrounding areas.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to provide a clear indication of how the MKS findings were included in the Final EIS (e.g., effects analysis, cumulative effects analysis, mitigation measures, etc.) including confirming use with MN-S.</li> <li>- The Assessment should not be considered complete until the Métis Knowledge Study is finished and factored in.</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #454)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLRO are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	<p>Details are not provided regarding how these programs and plans will be developed and implemented, or how they will integrate the needs of all the Indigenous and Métis communities.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to clarify whether discrepancies will only be addressed by follow-up and monitoring.</li> <li>- Denison needs to involve MN-S, NR1 and NR3 in determining other means for examining divergences and informing follow-up and monitoring (e.g., collaborative field studies).</li> <li>- Denison needs to include in the Final EIS, management and</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #455, #492, #501, #510, #511, #521, #523, #527)	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and	MN-S will be informed throughout the monitoring program design and implementation process.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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		<p>monitoring plans that were prepared with MN-S and NR1 and NR3 Locals involvement and agreement.</p> <ul style="list-style-type: none"><li>- Denison needs to include in the Final EIS, health risk assessment management and monitoring plans that are prepared with MN-S involvement and agreement to address suitability of land and resources for Indigenous land users.</li><li>- Denison should confirm this assertion through a monitoring program that will focus on providing data to verify the predictions and include communication planning to convey health risk assessment results. This may also address assumptions about perceived suitability of lands and resources.</li><li>- Denison needs to provide more detail within the Final EIS related to the health and wellness programs and their role in developing and providing resources of this type. This should include the provision of services more broadly within communities, not just to individuals on-site.</li><li>- Denison to confirm how Métis input is considered in mitigation development.</li><li>- Denison needs to provide more detail within the Final EIS related to a commitment to developing and key components of life skills programs. It is appropriate to address the issues as they are identified as an effect of the project in the proceeding section regardless of the certainty of these effects.</li><li>- Denison should clarify their commitment to providing provide community social services to the families of local employees to address issue identified in relation to the shift rotation (e.g., childcare services)</li><li>- Denison to provide additional information of on-site health services that will alleviate community-based health services in NR1 and NR3.</li><li>- Denison needs to confirm how social responsibility guidelines will support community infrastructure and services in NR1 and NR3 to help offset some of the interactions and effects to local communities and timelines for the action.</li><li>- MN-S requests that in the Final EIS, Denison include the addition of interactions and effects analysis for Post- Decommissioning impacts to economics that may stem from Employment Income within the LSA communities related to monitoring and the implementation of management programs to respond adaptively to potential effects of the Project. This includes monitoring and management programs prepared with MN-S, NR1 Locals, and NR3 Locals involvement and agreement.</li></ul>		<p>will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p> <p>As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.</p>				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for	<p>Denison did not engage MN-S on potential Project-related effects to Métis traditional use activities such as (but not limited to): hunting, trapping, and fishing. No Métis Knowledge was used to inform the Project’s spatial boundaries.</p> <p>Denison has not engaged MN-S to understand Métis knowledge to inform the development of the Project’s environmental monitoring and management plans (e.g., Caribou Management Plan). This applies to monitoring air emissions, noise monitoring, geology,</p>	<p>MN-S Public Comments (March 4, 2023) (Public Comment #445, #448, #457, #498,</p>	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations.</p> <p>A Capacity Funding Agreement was signed with the MN-S to complete a Métis</p>	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 as described in Section 4. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study</p>	<p>This has not been identified as an outstanding issue by the MN-S in its correspondence</p>	<p>As per MN-S letter dated March 31, 2025</p>	<p>Denison remains willing to engage on this topic as needed in the future.</p>

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	traditional purposes;	<p>groundwater quantity and quality, surface water quality, sediment quality, fish and fish habitat and human health. Information to be gathered during the Métis Knowledge Study will contribute to the development of these plans.</p> <p>Denison does not acknowledge MN-S, NR1, or NR3 involvement in the design and implementation of the post-decommissioning monitoring program.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to incorporate Métis Knowledge from the MKS into their discipline- specific effects assessment, the Final EIS, and all monitoring and management plans for the Project, where applicable.</li><li>- Denison needs to engage MN-S to determine the appropriate funding, process, and timeline to conduct the MKS.</li><li>- MN-S would like the opportunity to review applicable Project management documents that provide information that is relative to the potential impacts of the Project on traditional land use activities, these include, but are not limited to the following: Preliminary Decommissioning Plan, Status of the Environment reports, Environmental Effects Monitoring reports, annual reports, updated environmental risk assessments and the Final Decommissioning.</li><li>- Denison needs to provide plain language summaries, posters/handouts, and presentations on monitoring and effects management plans and programs to MN-S, NR1 Locals, and NR3 Locals. Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment.</li><li>- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to better understand how they would like to be informed of monitoring results (e.g., 1-page plain language summaries, annual monitoring report, community meetings etc.).</li><li>- Denison needs to revise its understanding of Métis, Métis governance and the differences between MN-S and Métis Locals.</li><li>- Denison needs to include MN-S, NR1 Locals, and NR3 Locals as Communities of Interest, or explain why they limited their selection of Métis communities in their listing.</li><li>- Denison needs to include in the Final EIS, information provided by Métis Locals in NR1 and NR3 on their input related to cultural expression.</li><li>- The Final EIS should include detail on how the input provided by Métis Locals in NR1 and NR3 and MN-S will influence the development of the location of pick-up points and commuter transportation options and address concerns related to in-migration and out-migration pressures.</li><li>- Denison needs to provide additional detail within the Final EIS related to Denison’s commitment to developing mitigations that address potential effects to community well-being such as support for community accessible health and wellness programs, community liaisons, community readiness programs, and long-</li></ul>	<p>#502, #505, #512, #513, #515, #526, #543, #545, #548)</p>	<p>Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.</p> <p>Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply.</p> <p>As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>	<p>(applicable to Sections 3, 4, 9, 11, 12, and 13). MN-S will be informed throughout the monitoring program design and implementation process. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. MN-S will be informed throughout the monitoring program design and implementation process (as described in Section 8)</p>	<p>dated March 31, 2025.</p>		

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		term monitoring opportunities. This includes mitigations that are prepared with MN-S, and NR1 and NR3 Locals involvement and agreement. - Considering the uncertainty identified in the Draft EIS about social effects of the Project on community cohesion, Denison needs to provide additional detail within the Final EIS related to Denison's commitment to developing monitoring and management programs to understand and respond adaptively to potential effects of the Project on community cohesion. This includes monitoring and management programs prepared with MN-S, and NR1 and NR3 Locals involvement and agreement that could support community members dealing with use of alcohol/substances and/or related violence and crime.						
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	As identified in section 11.1.6 (p. 11-66 to 11-68), Indigenous land use may be affected by the Project despite mitigations. It is reported that Project-related effects such as noise and dust can cause avoidance of the area by some resource harvesters while others may be undeterred. Denison acknowledges that several barriers to employment in northern Saskatchewan exist without providing solutions to address and/or mitigate such barriers. Recommendations: - Denison needs to include in the Final EIS, information provided by Métis in NR1 and NR3 once the MKS is completed. - Denison needs to support Métis training opportunities through Northlands College. - Denison needs to provide more detail within the Final EIS related to their role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities.	MN-S Public Comments (March 4, 2023) (Public Comment #530, #541)	Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project - such as on the job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions, including Northlands College, to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.  A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	Need some clarification on this statement as it's reasonable to assume that both parents (mother and father), aunts' and uncles, and other relatives who are members of the community/family would potentially be employed and be away from home. Transmission of knowledge has the potential to be disturbed if multiple family and community members are away on working rotation. Recommendations: - Denison needs to provide clarity in the Final EIS on the statement that "knowledge transmission is likely to continue because the entire family and community are involved" considering the potential that with local hiring practices in place, multiple family and community members may be away on working rotation and not able to adequately facilitate knowledge transfer.	MN-S Public Comments (March 4, 2023) (Public Comment #499)	Denison acknowledges that both parents (mother and father), aunts' and uncles, and other relatives who are members of the community/family could potentially be employed by the Project. Mitigation measures associated with potential effects to cultural continuity and the commuter-rotation system are described in Section 12.1.5 and include: - Working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities, where practicable; - Implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation - Using a commuter rotation system has also shown to be effective in allowing Indigenous employees continued opportunities to spend time on the land, and important factor in the transmission of knowledge and language (see Section 11 for a description of potential effects to land use).  Denison remains committed to maintain positive working relationships with all Indigenous COIs and will be open to discussion on any issues or concerns that	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				<p>arise.</p> <p>As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	<p>The Draft EIS points to follow-up programs as a way to address any uncertainties identified during the EA process. Insufficient detail is provided to reflect how avoidance of areas near the Project may occur; monitoring (and adaptive management) is needed. More clarity on how monitoring will be developed (in section 12.1.8, p. 12-34) to address this uncertainty.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to provide more detail in the Final EIS on monitoring (and adaptive management) for areas of uncertainty such as displacement of cultural activities. This includes management and monitoring plans that were prepared with MN-S involvement and agreement.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #500)	<p>Changes to knowledge transmission as described in Section 12.1.4.2.1 stem from two factors: changes to Indigenous Land and Resource Use, and individual participation in the commuter rotation system - both of which have the potential to affect the ways in which individuals spend time participating in cultural activities. Although there is some uncertainty as to the extent to which individuals will continue to participate in activities that support knowledge transmission, experience from other uranium operations in northern Saskatchewan, the shared and communal nature of cultural expression (i.e., occurs within entire extended families and communities) combined with the Project's minimal effects to land and resource use are not expected to alter the ways in which cultural expression currently occurs (or might vary under regular circumstances). As such, no specific monitoring related to changes to cultural expression are planned.</p> <p>Denison acknowledges the concern raised regarding cultural activities related to working at an industrial operation. Mitigation measures associated with potential effects to cultural continuity (including knowledge transfer and language) are described in Section 12.1.5 and include:</p> <ul style="list-style-type: none"><li>- working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities; and</li><li>- implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation;</li></ul> <p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring. Denison remains committed to maintaining positing relationships with Indigenous communities and will be open to discussion on any issues or concerns that arise over the course of the Project.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>Initiating efforts with LSA communities excludes most of the Métis communities and keeps them from benefiting. "Economic leakage (i.e., money leaving the local economy) is a relevant concern, particularly for small, concentrated economies. Economic leakage can occur at various points through the cascade of spending in an economy, but the closer that leakage occurs to the point source of</p>	MN-S Public Comments (March 4, 2023) (Public Comment	<p>Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to</p>	Section 13.4 Mitigation and Enhancement Measures also provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous	This has not been identified as an outstanding issue by the MN-S in its	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		investment, the more potential economic benefit that is lost.” Recommendations: - The Final EIS needs to include additional evaluation of non- LSA communities potential for income benefits. - Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation to manage for and reduce ‘economic leakage’. - It is unclear from the description of Mitigation and Enhancement Measures whether Impact and Benefit Agreements (IBAs) will be included. Impact and Benefit Agreements are a normal vehicle for extending economic benefits to Indigenous communities. - In the Final EIS, confirm whether IBAs are also a mitigation and enhancement measure.	#532, #537, #542)	service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Section 13.4 Mitigation and Enhancement Measures also provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.	communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project.	correspondence dated March 31, 2025.		needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Denison has not included MN-S or NR1 and NR3 Métis communities in the LSA for the assessment of the economy. Denison also has not engaged MN-S or all potentially impacted NR1 and NR3 communities to understand Métis concerns and/or interests related to employment and training opportunities. Recommendations: - Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Métis Local #9 on interests and concerns related to employment and training opportunities throughout the life of the Project. - Denison needs to provide more detail within the Final EIS related to their role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities. This includes training programs prepared with MN-S/NR1 and NR3 Locals involvement and agreement.	MN-S Public Comments (March 4, 2023) (Public Comment #535)	Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.  Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project - such as on the job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.	Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Denison has not included details on closure planning including traditional economic activities that can be expected upon decommissioning. Recommendations: In the Final EIS, Denison needs to provide additional information on closure planning and what traditional economic activities can be expected upon decommissioning.	MN-S Public Comments (March 4, 2023) (Public Comment #539)	The draft EIS includes the Project’s Conceptual Decommissioning Plan (CDP) (see Section 2.2.3). As the name implies the decommissioning plan for the site is presented at a relatively high level commensurate with the stage of Project development, including consideration of physical decommissioning activities and reclamation (or restoration) activities. With specific reference to reclamation / restoration the draft EIS notes that disturbed areas would be returned to become a self-sustaining and viable wildlife habitat, but little further detail is provided at this early stage. That detail will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes	Denison is committed to continued engagement with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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				more specific and granular it is expected that the design basis will become more detailed. Denison noted the MN-S interest in how traditional economic activities can be integrated into the decommissioning plan and such considerations can be made as the plan evolves. Denison is committed to continued engagement with the MN-S at their direction, inclusive of engagement in NR1 and NR3, and within that context expects that integration of traditional economic activities within the context of site decommissioning will be part of those discussions.				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Denison has not engaged MN-S, NR1, and NR3 to understand Métis-specific effects of the Project’s proposed commuter-rotation schedule. Recommendations: (1) In the Final EIS, Denison needs to provide more detail related to worker rotation system mitigation. Particularly considering the identification of reported difficulty in balancing the demands of a worker rotation system with traditional economy activities.	MN-S Public Comments (March 4, 2023) (Public Comment #540)	Denison acknowledges the concern raised regarding participation in the traditional economy related to working at an industrial operation. Participation in the worker rotation system would present similar challenges as those described in the Métis Knowledge Study Report which describes how people’s ability to go out on the land is challenged by work schedules generally and the busyness of the modern world. Mitigation offered for other VCs would equally apply to an individual’s ability to continue to participate in culturally important activities, such as: - working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities; and - implementation of Denison’s Indigenous Peoples Policy and advancement of reconciliation; Other uranium operations in northern Saskatchewan have show that using a commuter rotation system has been effective in allowing Indigenous employees continued opportunities to spend time on the land, which similarly supports the traditional economy.  Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3, and within that context expects that the concerns raised by the review comment will be part of those discussions.	Mitigations are described in Section 12 and 13.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Denison has not identified mitigation and enhancement measures to support their conclusion that employment and training residual effects are expected to be low to moderate in magnitude. Recommendations: (1) Denison needs to expand its description of mitigation and enhancement measures to better support their conclusion that employment and training residual effects that are low to moderate in magnitude in Section 13.5.	MN-S Public Comments (March 4, 2023) (Public Comment #544)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.  Denison recognizes that there is a need for and will be an annual evaluation of outcomes. The residual effect on employment and training during Construction, Operation, and Decommissioning is expected to be positive. Positive effects are expected to occur primarily in the LSA and RSA but are also expected to extend beyond the RSA as the labour demands of the Project are unlikely to be met with local resources only. Effects associated with employment are expected to occur continuously through each Project phase, while it is anticipated that training efforts will be focused largely during the operational phase (although some initiatives may be in place prior to the onset of Operation to maximize opportunities). Effects will be reversed after Decommissioning is completed; however, individuals who benefits from employment and training will have skills to carry forward to future opportunities.  Section 13.5 describes the mitigation and enhancement measures for	Section 13.5 describes the mitigation and enhancement measures for economy, including those specific to education and training	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				economy, including those specific to education and training: <ul style="list-style-type: none"><li>• Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</li><li>• Denison will plan a workforce transition plan prior to Decommissioning of the mine.</li><li>• Denison will negotiate with the Province of Saskatchewan to develop the Project’s SLA and the Human Resource Development Agreement, which will outline measures in relation to socio-economic parameters related to the Project.</li></ul>				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Further details are required on how emergency preparedness and response plans will adaptively respond to changing climatic conditions and potential unforeseen effects to the Project. Recommendations: <ul style="list-style-type: none"><li>- Denison needs to provide additional detail in the Final EIS about their commitment to developed adaptive emergency preparedness and response plans to address unforeseen effects to the Project resulting from climate change.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #547)	Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP). The EPRP would be established to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. As such, the documentation will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate. It is confirmed that the EPRP will include provision for change management and an explanation as to how change management will occur. The EPRP will be a living document that will be reviewed regularly and updated as needed - such updates may be required for a myriad of reasons including those related to climate change as noted by the review comment.	Section 2.9 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Interest in understanding about how well Denison was doing (financially) and the effect that has on community investment decisions.	ROC 62	Denison is a publicly traded uranium exploration and development company with interests focused in the Athabasca Basin region of northern Saskatchewan. The company trades on the Toronto Stock Exchange and NYSE American exchange and is headquartered in Toronto, Ontario, with offices in Saskatoon, Saskatchewan, and Elliot Lake, Ontario. Denison strives to achieve the development of the Project through positive partnerships with Communities of Interest, integrating information from Indigenous and non-Indigenous Interested Parties, and maintaining high standards for environmental protection and worker safety. Overall, the world and Canada need uranium to meet the projected future needs of nuclear power	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				generation, and the Project can provide a critical component in the nuclear fuel cycle while making a meaningful contribution to the Canadian economy and Saskatchewan’s northern and Indigenous communities.				
Métis Nation – Saskatchewan	Other	Concern expressed about ensuring Denison was following engagement protocols set out by the MN-S.	ROC 1 ROC 442	Section 4 describes the approach for engagement between Denison and MN-S that has occurred. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Métis Nation-Saskatchewan noted that the land the Project is located within is subject to a land claim.	ROC 62	Denison thanks the MN-S for the comment.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Questions were asked regarding the ISR mining process, transportation, and exploration.	ROC 62 ROC 1	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface.</p> <p>The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. Project-related truck traffic during Construction and Operation (such as surface construction equipment, materials, and drill rigs) is expected to originate from Saskatoon or other southern locations. Project-related traffic originating from the west may travel through Beauval via Highway 165, whereas traffic from the south and east may access Highway 165 via Highway 2. Traffic from Saskatoon would likely use Highway 11 to Prince Albert and Highway 55 to Beauval, then travel via Highway 165. Highways are under the authority of the Saskatchewan Ministry of Highways.</p> <p>The Wheeler River property was staked on July 6, 1977. Excluding the years 1990 to 1994, exploration activities, such as airborne and ground geophysical surveys, geochemical surveys, prospecting, and diamond drilling, have been carried out on the property from 1978 to present. As stated in Section 1.1, Denison became the operator of the property in November 2004 and carried out property-wide airborne geophysical surveys in 2005. The Phoenix deposit was discovered by diamond drilling in 2008 with subsequent delineation completed over the next six years from 2008 to 2014.</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	A question was asked about ponds for waste and waste rock.	ROC 1	The proposed ISR mining method for the Project will produce minimal volumes of waste and does not require the development of a conventional tailings management facility. A waste management program will be developed for the Project to support licensing. Denison is proposing to design pond, pad, and landfill liners systems and develop appropriate performance monitoring based	N/A	This has not been identified as an outstanding issue by the	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as

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				on the characteristics of the material being stored. For more information on waste management Section 2.2.4 for more information.		MN-S in its correspondence dated March 31, 2025.		needed in the future.
Métis Nation – Saskatchewan	Other	<p>To date, Denison’s engagement approach has not been collaborative. Denison has not engaged all potentially impacted Métis communities. Denison has focused engagement efforts on Métis communities in NR3. Denison does not acknowledge that the Project falls within the MN-S Homeland. MN-S is listed under Indigenous Organizations instead of Indigenous Communities of Interest. Per Denison’s definition, MN-S, NR1 Locals, and NR3 Locals should be considered an Indigenous Community of Interest. Denison notes site visits as the only engagement-associated activities in each Project Phase. Additional involvement opportunities should be provided to MN-S throughout the life of the Project. Further, MNS refers to CNSC correspondence (Appendix A) indicating that consultation and engagement was expected to be with NR1 Locals, NR2 Locals, NR3 Locals, and MN-S. Given NR2’s involvement in NexGen and Fission, MN-S limited its engagement and consultation expectations to NR1 Locals, NR3 Locals, and itself. Denison did not engage MN-S on potential Project-related effects to Métis traditional use activities (such as but not limited to: hunting, trapping, and fishing) and therefore may not be aware of potential traditional use activities conducted by Métis peoples in and around the Project. Denison’s reliance on reviewing traditional resource user leases is not an appropriate way to determine Métis traditional resource use in and around the Project.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to engage all potentially impacted Métis communities. Specifically, to see Denison equally engage NR1 Locals and NR3 Locals in addition to Kineepik Métis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest</li><li>- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment, procurement, and cultural opportunities, engagement expectations (e.g., involvement of youth and Elders), and approach for gathering and incorporating Métis Knowledge into Project reports, plans, and processes.</li><li>- Denison needs to incorporate Métis Knowledge from the Métis Knowledge Study (MKS) into their discipline-specific effects assessment, the Final EIS, and all monitoring plans for the Project, where applicable.</li><li>- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to determine the appropriate funding, process, and timeline to conduct the MKS.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #439, #440, #442, #444)	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. Denison has updated the revised draft EIS executive summary to acknowledge that the Project falls within the MN-S Homeland, including the unique situation that the MN-S have in the area.</p> <p>A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 as described in Section 4). Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). The revised draft EIS executive summary has been updated to acknowledge that the Project falls within the MN-S Homeland,	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Denison created “Key Issues and Concerns” tables in their EIS to document responses to issues and concerns identified by	MN-S Public Comments	Since being advised by the MN-S in October 2019 that a number of Métis Locals had delegated to the MN-S the Duty to Consult for the Project, Denison	Denison continues to engage with the MN-S at their direction	This has not been identified	As per MN-S letter dated	Denison remains

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		<p>Indigenous Groups.</p> <p>Denison marked issues and concerns that they believe have been addressed as “Complete” in “Key Issues and Concerns” tables throughout the Draft EIS. Directing MN-S and Métis Locals to chapters within the EIS is not a sufficient response to an issue or concern identified by MN-S and Métis peoples. One- way information sharing is not an effective means for addressing or mitigating issues and concerns identified by MN-S and Métis people. Responses to issues regarding effects should discuss the presence or absence of effects, rather than responding that effects were studied.</p> <p>MN-S has not had an opportunity to review Denison's engagement plan.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to respond to issues and concerns identified through engagement during meetings with and communications to MN-S, MN-S, NR1 Locals, and NR3 Locals.</li> <li>- Denison needs to implement a collaborative engagement approach that allows MN-S, NR1 Locals, and NR3 Locals to provide feedback and inform Project decision-making, plans, and outcomes versus one-way information sharing engagement approach.</li> <li>- Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment.</li> </ul>	(March 4, 2023) (Public Comment #443, #461)	<p>has been engaged in extensive ongoing discussions with the MN-S with the goal of reaching agreement regarding the EA process and MN-S' participation in it. Denison continues to engage with the MN-S, inclusive of engagement in NR1 and NR3, at their direction and there is no formal engagement plan, as such Denison does not feel there is a need for MN-S review as continued engagement is informed by and at the direction of the MN-S in an ongoing manner.</p> <p>For example, in recognition of the MN-S potential interests in the Project, Denison and MN-S have negotiated a capacity funding agreement. This agreement outlines a mutually agreeable framework and applicable funding arrangements to facilitate the MN-S' participation and engagement in the EA process for the Project.</p> <p>The parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings.</p>	and there is no formal engagement plan, as such Denison does not feel there is a need for MN-S to review an engagement plan as continued engagement is informed by and at the direction of the MN-S in an ongoing manner. In recognition of the MN-S potential interests in the Project, Denison and MN-S have negotiated a capacity funding agreement (identified in Section 4).	as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	March 31, 2025	willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	<p>The draft EIS does not clarify the influence of groundwater temperature on Whitefish Lake.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to confirm the influence of groundwater temperature on Whitefish Lake in the Final EIS.</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #446)	There is no expectation of influence of groundwater temperature on Whitefish Lake during any phase of the Project. Groundwater would be expected to enter (discharge) to Whitefish Lake at its typical ambient temperature.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	<p>he removal of the freeze wall may cause increased migration of constituents that could cause environmental release to the receiving environment unintentionally.</p> <p>Recommendations:</p> <p>Denison needs to clarify the following with MN-S, NR1 Locals, and NR3 Locals:</p> <ol style="list-style-type: none"> <li>the freezing effects on the Upper and Lower barrier zones post mining, and</li> <li>if the freeze thaw process could cause increased fracturing potential within these zones.</li> </ol>	MN-S Public Comments (March 4, 2023) (Public Comment #447)	A separate technical memo including information related to freeze wall integrity and the basis for design of the freeze wall, which relies on site field data and lived experience from several exiting Saskatchewan mining operations, is provided as an attachment to Attachment to IR-10.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	<p>Denison's EIS suggests SaskPower's work related to the extension of an existing 138 kV line will be independent from work led by Denison.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to clarify whether the additional 138 kV line was factored into the cumulative effects evaluation.</li> <li>- Denison needs to clarify whether the proposed Project can</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #449)	Denison provides that the SaskPower extension of an existing 138 kV line is part of the Project component. As it is part of the Project undergoing the assessment, it is not a distinct reasonably foreseeable development included separately in the CEA.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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		<p>proceed without the 138 kV line construction.</p> <ul style="list-style-type: none"> <li>- Denison needs to clarify the timing of the construction of the line and Wheeler River Project construction.</li> <li>- Denison needs to confirm that SaskPower will engage with MN-S, NR1 Locals, and NR3 Locals on line routing and design.</li> <li>- Denison needs to confirm if/when the 138 kV line will be decommissioned.</li> </ul>				dated March 31, 2025.		
Métis Nation – Saskatchewan	Other	<p>The Draft EIS does not include a draft Environmental Protection Plan (EPP) or a summary of how the EPP will be developed. The Métis Knowledge Study is yet to be completed and these plans should not be completed without considering the Métis Knowledge Study. Draft monitoring plans were not available for review to confirm how Denison plans to inform plans with existing local and traditional knowledge.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to provide an Environmental Protection Plan with the Final EIS.</li> <li>- Denison needs to involve MN-S, NR1 Locals, and NR3 Locals in the development and implementation of the Environmental Protection Program so that Métis can ensure their interests and Métis Knowledge are included. Additionally involvement in the development of monitoring plans and review of MN-S knowledge usage and how it informed the plan should also be undertaken.</li> <li>- Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for input, review and comment.</li> <li>- Denison needs to include an implementation and reporting plan with the monitoring plans.</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #452)	<p>With respect to Part i) of the comment the following is noted. The MN-S review comments accurately indicates that a draft Environmental Protection Plan was not included in the EIS submission; rather, Section 2.9.1.3.1 of the draft EIS provides the commitment to develop an Environmental Protection Program (EPP) and associated plans. The EPP would be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets. The EPP would be developed in a manner that aligns with the ISO 14001 EMS Standard. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. As such, the documentation referenced in the MN-S review comment will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S, and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate.</p> <p>With respect to Parts ii), iii) and iv) of the comment the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLRO are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment. Additionally, and as noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). MN-S will be informed throughout the monitoring program design and implementation process (as described in Section 8).	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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				will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.				
Métis Nation – Saskatchewan	Other	MN-S appreciates Denison’s willingness to evolve engagement activities in response to feedback from MN-S over time. Recommendations: - Denison to continue engaging and involving MN-S, NR1 Locals, and NR3 Locals during the revisions of the Draft EIS and completion of outstanding plans.	MN-S Public Comments (March 4, 2023) (Public Comment #458)	Noted, throughout the engagement, Denison has consistently affirmed its interest in MN-S participation and the incorporation of Métis knowledge into the EIS, in addition to the information and input that has already been gathered with KML.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Denison is taking engagement direction from MN-S to not lump public engagement efforts with Métis engagement is appreciated. Recommendations: - Denison needs to engage Beauval/Sipishik Métis Local #37 throughout the life of the Project.	MN-S Public Comments (March 4, 2023) (Public Comment #459)	Noted, Denison will continue to engage with MN-S, including Beauval/Sipishik Métis Local #37, at their direction for the life for relevant stages of the Project.	Denison will continue to engage with MN-S, including Beauval/Sipishik Métis Local #37, at their direction for the life for relevant stages of the Project.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	It’s best practice in environmental assessments to acknowledge limitations on data and analysis used for the assessment. This identifies constraints imposed on the assessment due to limitations in data or analysis that can influence or limit the ability to predict potential effects of the Project. This may be provided as a “technical boundary” or in some other transparent way as a part of the assessment reporting. Recommendations: - Denison needs to provide details in the Final EIS on data and analysis limitations.	MN-S Public Comments (March 4, 2023) (Public Comment #466)	Data and analysis limitations are described within the relevant VCs existing environment, where applicable. As an example, See Section 12.2.3 Existing Environment for Community Well-Being which describes the limitations of Statistics Canada Census of Population Data, the limitations of Statistics Canada incident-based crime statistics, limitations associated to key person interviews, and others.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Details should be provided on what level of residual effects are carried forward for residual effects evaluation. This would help provide a consistent method for bringing measurable effects for a full residual effect assessment. This ensures that measurable (even minor) are not overlooked in residual effects characterization and consideration of significance. From review of the Draft EIS, there are instances where effects that remain after the implementation of all mitigation measures and management plans are characterized as minor and not carried forward for evaluation. Recommendations: - Denison needs to provide details on the development and choice of thresholds used to describe residual effects including how LK and IK were considered in threshold development. - Denison needs to provide further explanation as to why minor	MN-S Public Comments (March 4, 2023) (Public Comment #467)	Section 5 of the draft EIS provides an overview of the assessment methodology, including how residual effects were characterized (i.e., those effects that were measurable after consideration of proposed mitigation. Each technical section of the draft EIS where effects are considered (draft EIS Sections 6 through 13) uses this assessment framework in consideration of the specific VCs / KIs that have been defined to represent that environmental component. Effects thresholds that define the presence / or absence of a residual effect have been described for each VC / KI. In some cases the thresholds are narrative in nature and in some cases, where available, numeric thresholds are used. The former tended to be based on SME knowledge and experience in like assessments and situations and in the latter the thresholds tended to be derived from published environmental quality objectives and guidelines. As an example, the manner by which residual effects were characterized for the Fish and Fish Habitat VC is given. Section 8.3.6.1 of the draft EIS provides the definition for a residual effect as follows, "A residual	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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		effects will have no or negligible effects and should not be considered further.		<p>adverse effect on the Fish and Fish Habitat VC is defined as a measurable change in the concentrations of a surface water quality parameter(s) that exceed relevant water quality assessment benchmarks that represent concentrations that are protective of aquatic biota and water uses in watercourse and waterbodies that receive mine-affected drainage. " In this example a numeric threshold is used (i.e., a relevant water quality assessment benchmark) and rationale is provided for its use (i.e., represent concentrations that are protective of aquatic biota and water uses in watercourse and waterbodies that receive mine-affected drainage). The threshold is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue.</p> <p>Each technical section of the draft EIS where effects are considered (draft EIS Sections 6 through 13) notes how Indigenous Knowledge (IK), Local Knowledge (LK) and Engagement influenced the assessment. Whether generic or specific in nature the information was considered and woven into the assessment where possible. For example, water and the protection of water was generally noted as a key consideration to Indigenous peoples and LK holders. Accordingly, informs the framework of the assessment to ensure that water quality related VCs are included to provide a comprehensive evaluation related to water quality and affirms the need to assess water quality and sediment quality as they inform assessments for benthic invertebrates, fish and fish habitat, human health, and Indigenous land and resource use components.</p>				
Métis Nation – Saskatchewan	Other	<p>Clarity is required that this includes existing ongoing activities that may not be certain but are highly likely to occur such as forestry and mine exploration activity. Denison did not include the new powerline that SaskPower is building in Table 5.9-1: Projects and Activities for Consideration in the Cumulative Effects Assessment for the Valued Components. See Section 2.3.1.9 for more details on the powerline to be constructed by SaskPower.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>Denison needs to provide further detail on the projects and activities that were considered for cumulative effects and why certain projects and activities were not included. For example, Denison needs to explain how reasonably foreseeable projects and activities that may not be certain but are highly likely in the RSA, such as mining exploration or infrastructure use and maintenance, are not included in Table 5.9-1.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #469)	<p>Section 5.9.2 of the draft EIS provides an overview of other Projects and activities that were considered present and reasonably foreseeable and could be a source of residual effects that could interact with the Project-specific residual effects. A preliminary list of projects and activities for potential consideration in the VC-specific cumulative effects assessment for the Project was provided in Table 5.9-1 of the draft EIS and their locations were shown relative to the Project site in Figure 5.9-1. Per Section 5.9.2.1 of the draft EIS, the original (or "preliminary") list of Projects and activities was scrutinized relative to various screening criteria to identify those present and reasonably foreseeable Projects and activities that were likely to interact with the Project VC in cumulative manner. Also show in Section 5.9.2.1 are the criteria by which the Present or Reasonably Foreseeable Projects and Activities were assessed. These criteria are consistent with CEAA's interim technical guidance on a future project (or physical activity) and how it could be considered reasonably foreseeable and areas as follows:</p> <ul style="list-style-type: none"><li>The intent to proceed is officially announced by a proponent.</li><li>The project or activity is under regulatory review (i.e., the application is in process).</li><li>The submission for regulatory review is imminent.</li><li>The project or activity is identified in a publicly available development plan that is approved or for which approval is anticipated (e.g., a wastewater treatment plant in a city's long term development plan).</li><li>The physical activity supports—or is consistent with—the long-term economic or financial assumptions and engineering assumptions made for the</li></ul>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				<p>project’s planning purposes.</p> <ul style="list-style-type: none"><li>• A physical activity is required in order for the project to proceed (e.g., rail or port transportation facilities, or a transmission line).</li><li>• The economic feasibility of the project is contingent upon the future development.</li><li>• The completion of the project would facilitate or enable the future development.</li></ul> <p>Further information with respect to present and reasonably foreseeable projects and activities pertaining to exploration and mining activities, infrastructure use and maintenance, lodges/outfitters and tourist/ recreational activities and Indigenous and other land use activities are described in draft EIS Sections 5.9.2.1.1 through 5.9.2.1.4, respectively. Rationale for not carrying forward projects / activities that were part of initial screening is described in Section 5.9.2.2.</p> <p>The review comments has specifically references the power line development associated with the implementation of the Project. In response the following is offered. While it is true the power line to service the Project will be constructed by Sask Power the power line has been considered a Project activity for the purpose of the effects assessment and has been assessed in that context. With that there is no rationale nor need for assessing it as a separate project / activity within the CEA.</p>				
Métis Nation – Saskatchewan	Other	<p>There is lack of geotechnical information in the Draft EIS that would expand explanation of Project interactions with geology and groundwater.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- The Final EIS needs to demonstrate Denison’s commitment to developing appropriate mitigations to avoid or limit identified adverse effects resulting from the Project, whether direct or indirect.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #470)	<p>Denison recognizes that geology and groundwater are of particular importance within the context of the EIS given the proposed mining method and believes that the assessment presented in the EIS and its supporting documentation is comprehensive. Denison is committed to developing / implementing appropriate mitigations to avoid or limit identified adverse effects resulting from the Project, whether direct or indirect. Proposed mitigation measures specific to geology and groundwater and presented in the draft EIS, Section 7.5, Mitigation Measures, and Table 7.5-1 therein provides a summary of mitigation measures based on Project phases for the geology and groundwater VC.</p>	<p>Proposed mitigation measures specific to geology and groundwater and presented in the draft EIS, Section 7.5, Mitigation Measures, and Table 7.5-1 therein provides a summary of mitigation measures based on Project phases for the geology and groundwater VC.</p>	<p>This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.</p>	<p>As per MN-S letter dated March 31, 2025</p>	<p>Denison remains willing to engage on this topic as needed in the future.</p>
Métis Nation – Saskatchewan	Other	<p>There is lack of information, details and modelling related to potential subsidence.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to provide additional detail in the Final EIS about mitigation measures related to operations affecting subsidence at ground surface including managing for different subsidence areas, different subsidence sizes, and whether subsidence will propagate further ground surface disturbances that will require further and continuous action.</li><li>- Denison needs to prepare a management and monitoring plan for subsidence.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #471)	<p>To clarify with respect to the potential for subsidence, it is noted that the portion of the deposit being mined is never truly a void and what remains after mining will be a honeycomb texture with water-filled interstices. The mined area is filled with a fluid at all times, whether it be a mining solution, groundwater, or the neutralizing solution. This is different from a more traditional underground operation such as Cigar Lake, where there is physical excavation of the orebody, leaving a temporary air-filled space. Although the uranium ore is high-grade by global standards it is not entirely massive in nature. As such, the uranium will be leached in a 'honeycomb' texture leaving behind a structure of partial intact rock mass with the remaining area being filled by fluid. This retains the pressure balance of the mining zone with the adjacent water-saturated rock masses.</p> <p>Although the above provides context on the absence of true, air-filled voids remaining post-mining, the risk of subsidence has been assessed appropriately in the draft EIS and its supporting documents (see draft EIS as Appendix K to Appendix 7-C; see also draft EIS Section 7 Geology Valued Component - Terrain</p>	<p>N/A</p>	<p>This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.</p>	<p>As per MN-S letter dated March 31, 2025</p>	<p>Denison remains willing to engage on this topic as needed in the future.</p>

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				<p>Morphology and Stability Key Indicator and draft EIS Section 9 Terrain Valued Component - Terrain Morphology Key Indicator and Terrain Stability Key Indicator). The analysis presented in the draft EIS shows there is negligible risk of subsistence and the magnitude of subsistence, if it were to occur, is the range of 7.5 cm at surface.</p> <p>Subsequent to the filing of the draft EIS, Denison has undertaken additional modelling with refined, more granular inputs including consideration of subunits within the altered zone. With this more refined analysis, the potential surface subsidence has been reduced from 7.5 cm to 2.4 to 2.8 mm. Further, this potential subsidence, if it were to occur, would be limited to the footprint directly above the deposit. Given the low levels of risk that has been determined, Denison believes the monitoring and contingency plans as envisioned in the draft EIS are commensurate with this low level of risk and appropriate.</p>				
Métis Nation – Saskatchewan	Other	<p>“Fish Health VC are primarily related to c the controlled” – there is a typo in the report.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to address the typo and replace “c” with the complete word.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #475)	Acknowledged. The typo will be corrected in the final version of the EIS as follows, "Potential Project residual effects on the Fish Health VC are primarily related to controlled discharge of site water into local receiving environments during all Project phases."	The typo was corrected in Section 8.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	<p>Figure 9.2-8 identifies lakes and waterbodies separately. There is a lack of clarity between a lake and a waterbody and its treatment in the EIS.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to clarify and distinguish in the Final EIS if and why lakes and waterbodies are treated differently.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #478)	<p>Footnote 4 of Table 9.2-5 of the draft EIS describes "lakes" and "waterbodies" the difference within the context of the assessment as follows: “Lakes have been defined as either named lakes or waterbodies observed to exhibit an average depth of ≥2 m (Ecometrix Incorporated 2020). Waterbodies are defined as areas of open water observed to exhibit an average depth of &lt;2 m (Ecometrix Incorporated 2020), or unnamed areas of open water without any existing bathymetric information."</p> <p>For further reference it is noted that lakes were not considered wetlands and not carried forward in our assessment, but waterbodies (identified as either &lt;2m deep or without bathymetric information) were conservatively considered to be shallow open water wetlands and assessed in the wetland assessment.</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	<p>Contrary to the text describing the Traffic Study Area, Highway 914 and Highway 165 are not labelled on Figure 12.3-3.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- MN-S request the revision of Figure 12.3-3 to include labelling of Highway 914 and Highway 165 in the Final EIS.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #517)	Please refer to Figure 12.3-4 which describes the location of the Project in relation to Highway 914 and 165.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	<p>Meeting current regulations and building codes may not be sufficient for short-term or long-term environmental effects as they are characterized in the Draft EIS (e.g., forest fires, flooding). Please provide detail on how the Project will be designed to</p>	MN-S Public Comments (March 4, 2023)	From an operations perspective the current mine design is sufficiently robust such that changes in environmental conditions that may be expected, such as increased precipitation event intensity, over the operational life of the mine can be accommodated. For example, the design basis for water management	N/A	This has not been identified as an outstanding	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this

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		exceed current regulations in anticipation of changing to environmental conditions. Recommendations: - Denison needs to provide additional detail in the Final EIS describing how the Project will be designed beyond current regulations and building codes in anticipation of changes to environmental conditions.	(Public Comment #546)	infrastructure far exceeds standard design basis. The following is noted regarding the design basis for water management infrastructure for reference. The probable maximum precipitation (PMP) value of 493 mm selected for design of water management infrastructure, such as ponds, is similar to total annual precipitation (456 mm from Key Lake station, and 483 mm from 1981-2020 climate normals). The selected PMP is well above (>5 times higher): 1) current/measured 24-hour maximum precipitation, 2) modelled 1 in 100 year 24-hour return for current conditions, 3) modelled 1:100 year 24 hour return for a future (2020-2050) period, 4) the predicted maximum 1-day precipitation under different emissions scenarios for the future (including RCP8.5 in the 2021-2050 period).  Design basis to accommodate environmental change over the longer term is a factor that will be considered as it pertains to decommissioning. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. Denison is committed to and will factor in longer term considerations of environment and climate within the evolution of the decommissioning plan, and in particular as it concerns how changes in environment and climate could affect decommissioning and restoration goals.		issue by the MN-S in its correspondence dated March 31, 2025.		topic as needed in the future.
Métis Nation – Saskatchewan	Other	These meetings had representation from Métis Local #39 (La Loche) and no other Métis. It is unclear who asked, "What are the concerns with groundwater monitoring...". MN-S does not consider Denison's engagement with the EQC as engagement with MN-S or Métis communities. MN-S prefers Denison specify feedback shared at join workshops by Indigenous Nation. Recommendations: - Denison engagement with Métis communities has been limited. In the Final EIS, MN-S expects to see more informed engagement and responses to concerns raised.	MN-S Public Comments (March 4, 2023) (Public Comment #549)	Thanks and noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Page ii of this document states: ““By accounting for these reactions, the simulated dissolved constituent plumes emanating from the ore zone reach their maximum extents within the deeper units (i.e., Lower Sandstone Aquifer and deeper parts of the Desilicified Zone) after approximately 10,000 years. Consequently, concentrations at Whitefish Lake throughout the future centuries are simulated to be similar to background concentrations. Under the base case scenario, which represents a conservative estimate of the conditions present, there are no exceedances of the groundwater quality screening criteria protective of freshwater aquatic life in the receiving environment.” Whether conditions are “conservative” or not, is dependent on perspective.	MN-S Public Comments (March 4, 2023) (Public Comment #550)	It is acknowledged that additional details could have been added to the Appendix 7-C Executive Summary to provide more fulsome context for the comment that the "base case scenario" is conservative. The basis for this statement was the robust data set of subsurface geochemistry that supported the assumptions in the model with respect to concentrations of sorbing mineral phases and the uncertainty analysis that was performed. The uncertainty analysis evaluated the potential that conditions at the base case were not adequately conservative. The uncertainty analysis is detailed in Section 4.7 of the report. This included increasing the mass of chemical constituents of potential concern (COPCs) within the source (mining area), increasing the hydraulic conductivity of key zone and/or hydrostratigraphic units, decreasing the number of reactive sites for sorption of COPCs, removing	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



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		Recommendations: - Denison needs to provide further rationale detailing how the “base case scenario” represents a conservative estimate of the conditions present.		some sorbent phases altogether from key hydrostratigraphic units, and other scenarios focused on geochemical and hydrolaugic uncertainties. Altogether, there were 15 uncertainty scenarios tested in addition to the base case.  For the base case, and all uncertainty scenarios, no exceedances of ground water quality screening criteria were generated at Whitefish Lake into the future (i.e. over the "future centuries" period), apart from those that reflect natural conditions. The results are provided in detail in Sections 4.6.6 and 4.7.1 of Appendix 7-C and the consistency of the uncertainty results with the base case affirms that the base case simulation is appropriate for decision-making.				
Métis Nation – Saskatchewan	Other	Denison provides no rationale for “conservative dispersivity values” in the Draft EIS. Recommendations: - Denison needs to provide site-specific research to confirm literature dispersivity values are conservative in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #551)	Site-specific research, as understood from the comment, would require a natural gradient tracer test over the distances of interest (> 1 km). Such testing would take centuries, and therefore is not practical. For this reason, use of literature dispersivities is standard practice.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Additional modelling will be needed to confirm at the time of decommissioning the assumption that there is “large assimilative capacity” of the groundwater system, in order to manage risk in Whitefish Lake. Recommendations: - Denison to complete simulations that increase focus on maintaining containment of the contaminant source for a greater period of time (i.e., a higher level of focus on source term control and flushing), and less reliance on management of contaminant along the pathway, prior to the contaminant reaching the receptor. In other words, simulations that focus, to a greater extent, on evaluating the benefit of additional effort and time on source term control (the first step in the risk hierarchy of source, pathway, receptor).	MN-S Public Comments (March 4, 2023) (Public Comment #552)	The comment is noted and it is Denison's intent to continue to evaluate what is reasonably achievable with respect to remediation of the mining zone water quality prior to discontinuation of containment measures. After 30+ years of monitoring we will be in a better position to update predictions and have enhanced confidence in the assimilative capacity. Flushing of the source zone is part of the planned remedy and would only be stopped once the target level of remediation has been achieved. Beyond that flushing period (which may take years), if conditions indicate additional long-term source control is required, then Denison may have to do that, but our current understanding suggests long-term source control is not needed so long as the flushing is able to reduce source concentrations to the target amounts. Lab testing suggests the proposed flushing will be effective at reducing concentrations to the target values.  Additionally, we note that refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Métis Nation – Saskatchewan	Other	Denison assumes non-surface reaching groundwater will not be extracted or accessed by future generations. Recommendations: - Denison to study and provide further understanding of deep groundwater characteristics with MN-S, NR1 Locals, and NR3 Locals prior to commencement of mining operations. This information may affect final closure options. - Denison to consider modelling for surface receptors of deep groundwater beyond the boundaries identified in Section 1.1.	MN-S Public Comments (March 4, 2023) (Public Comment #553)	Denison did complete engagement with Interested Parties, including Indigenous Communities of Interest and it is based on that engagement that it is understood deep groundwater use does not presently occur, nor is expected to in the future. Further, impacted groundwater is 100's of meters below ground surface, which is far below what would be needed for a future water supply as the flow through the shallower aquifer is far greater than through the deep aquifer. During operations, Denison will continue and expand groundwater monitoring to ensure that current study findings are realistic. Modelling simulations report the highest levels of predicted discharge to surface water - any discharge to more distant surface water bodies would be at even further reduced concentrations. Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	Denison’s Draft EIS does not confirm if the groundwater recharge rates were adjusted for potential changes to recharge as a result of climate change. Recommendations: - Denison should develop a Project-specific climate change model database, which clearly articulates the shared socioeconomic pathway (SSP) the Project is choosing from IPCC AR6, and show how that scenario has been down- scaled for use within Project modelling predictions, and present the results in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #554)	<p>A qualitative and quantitative assessment of climate change and groundwater and surface water is provided:</p> <p>The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early fall, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late fall, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late-century periods.</p> <p>If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure.</p> <p>Section 8.1.3.4 (and Appendix 8-C) provides a quantitative assessment of the potential changes in surface water quantity due to climate change. The 1:100 year, 24-hour return period rainfall events for the baseline and climate change influenced IDF curves are 79.9 mm and 88.6 mm, respectively. The PMP for the Project is estimated to be 493 mm (refer to IR-15 and AD-15) which is well above both 24-hour maximum precipitation and 1:100, 24 hour return precipitation events. The PMP is very conservative (e.g., assumes effectively a full year of precipitation in one event) under both existing and future conditions (climate change). The potential impacts of climate change to</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				<p>precipitation and therefore flows was summarized in Appendix 6-C, Table 10 with the total annual precipitation and the maximum 1-day events being variable over the next four decades (Table 1). Regardless, the climate change scenario indicates a potential increase in event based assimilative capacity in the receiving environment.</p> <p>TABLE 1- Existing and Predicted Precipitation Data for Key Lake (provided in EIS, Appendix 6- C, Table 10).</p> <p>To mitigate the potential for unplanned release of deleterious substances into the surface water environment even during the next 40 years of climate change, the PMP of 493 mm was used for water management engineering designs. During a PMP, water requiring management will report to the wellfield runoff pond which will be sized to accommodate a PMP event at the site. This pond has been sized to 38,200 m3 (excluding a freeboard of 1 meter). From the wellfield runoff pond, water will then be sent to the process water pond for treatment if required. In Section 2.8 Project Design Features, Denison notes that “Ponds will be designed to maintain a minimum freeboard of at least 1.0 m to allow for continued functioning during a probable maximum precipitation (PMP) event.” As such, the project has been designed to manage water during PMP and greater, and therefore mitigation of potential impacts to water quality due to climate change has been initially included as part of the EIS. As a result, it is Denison's opinion that a quantitative assessment of potential impacts to surface water quality is not warranted as it is likely to indicate improved results from the conservative assessment of potential water quality changes during operation and decommissioning phases. Continued monitoring of background, effluent and receiver water quality will be undertaken and provide the ability for adaptive management throughout the life of the mine in association with potential climatic changes to the local and regional area.</p>				
Métis Nation – Saskatchewan	Other	<p>Water levels in surface water features are not static; they change in response to regional climate and flow conditions. This would influence the interaction between groundwater and surface water, as the assumption by the model developer is that water levels are input as static head boundary conditions.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to explain in the Final EIS why static head boundary conditions are used for the modelling beyond a need to simplify the modelling.</li></ul>	MN-S Public Comments (March 4, 2023) (Public Comment #555)	<p>Water levels within surface water bodies were monitored over several years. The range of observed water levels at Whitefish Lake (SA-6) during 2016-2018 was 499.5 to 500.2 m ASL, with an average of 500.1 m ASL; as such the value assigned in the model (500.0) is an accurate (and slightly conservative) reflection of the average water level observed. What is important is the hydraulic head difference over the 300-year (or more) transport travel time. Recognizing that future conditions could be different by as much as 2 m (i.e., the depth of Whitefish Lake), this range of water level could be tested.</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	<p>Denison does not provide the basis, explanation, or literature to state that a calibrated model to observe water levels is sufficient with a deviation of +/- 2m.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to provide an explanation, basis, and/or literature to state that a calibrated model to observe water levels is sufficient with a deviation of +/- 2m in the Final EIS.</li></ul> <p>Denison provides no rationale/basis for considering a mean error of 0.23 considered to be an “excellent match” to the observed water levels.</p> <p>Recommendations:</p>	MN-S Public Comments (March 4, 2023) (Public Comment #556, #557)	<p>The mean residual is 0.23 m, not 2 m as inferred. The 2 m guidelines are merely presented for reference. The literature is quoted regarding the goodness of fit parameter NRMS, which is normalized so that it can be applied to any model. The NRMS achieved within the Denison model is 4.1%, whereas the literature (Spitz and Moreno) recommend 10% or less. As such the model is considered calibrated by literature standards. The qualitative term "excellent match" is based on 30-years of experience in developing 100's of similar numerical groundwater flow models.</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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		- Denison should provide an explanation, basis, and/or literature for why a mean error of 0.23 is considered to be an “excellent match” to the observed water levels in the Final EIS.						
Métis Nation – Saskatchewan	Other	Ecological receptors could potentially be exposed to groundwater flows. Recommendations: - Denison should provide an understanding of deep groundwater as a contaminant pathway to ecological receptors within immediate vicinity in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #558)	Denison and its SMEs believe that this (i.e., what is referenced in the review comments ) is what has been done (and presented in the report) by evaluating groundwater flow to a small portion of Whitefish Lake. At other locations (e.g., the edges of the Lake), shallow groundwater will be discharging, which has not come into contact with the deeper groundwater.	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	The Project has assumed that it is “conservative” to supply all water for the Project from outside the ore zone, and assume minimal influent from re-cycled / treated water. This statement supports that position. Recommendations: - Denison should provide simulations that maximize recycling treated water, rather than minimize using recycled water for the Project. - Denison to confirm how groundwater quality predictions differ when recycled and treated water is used to supply water to the Project, as compared to assuming conditions as noted in this statement.	MN-S Public Comments (March 4, 2023) (Public Comment #559)	<p>With respect to the first bullet: It is believed that the analysis completed is appropriate given that it represents a conservative (i.e., protective) means by which to assess the activities potential effects. The scenarios / simulations referenced in the review comment therefore are bounded by the conservative water supply assessment as it concerns potential Project effects to groundwater quantity. Denison concurs with the idea that it would be beneficial to maximize recycling of water and will strive to do so; however, this is more of an operational consideration. As outlines in draft EIS Section 2.2.3, Denison intends to recycle process water to the greatest extent possible, thereby reducing the demand for fresh water supply and volume of treated effluent. In an effort to develop a conservative assessment basis for the EA, the water recycle flows from the industrial wastewater treatment plant back into the processing plant and wellfield have not been incorporated into the estimates for freshwater withdrawal and treated effluent discharge.</p> <p>An overview of the site water balance during Construction, Operation, and Decommissioning are provided in draft EIS Figure 2.2-14, Figure 2.2-15, and Figure 2.2-16, respectively. These figures provide a summary of the water needs for certain Project activities, plans for water treatment (both potable and wastewater), and the general flow of managed water at the site. The estimated flows in the site water balances do not account for water recycle back into the processing plant and wellfield. This results in a conservative estimate of both freshwater withdrawal needs and treated effluent discharge rates.</p> <p>With respect to the second bullet point: Under the modelled scenarios, in which water is withdrawn from three water supply wells, the shallow groundwater system is simulated to recover very quickly following the cessation of decommissioning. Thus, the taking of shallow groundwater during Operations and Decommissioning will not influence the overall transport of potential contaminants in Post-Decommissioning after the containment (including the freeze wall) is removed. In addition, it should be recognized that if less water is withdrawn from the shallow bedrock for Operation, that additional groundwater left in the flow system will naturally act to further dilute any concentrations reaching the shallow aquifer and surface water receptors. That is why we feel the simulations presented are conservative.</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	The interaction of increase drought or increased precipitation (i.e., climate change) could potentially affect the length of time for full	MN-S Public Comments	The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of	N/A	This has not been identified	As per MN-S letter dated	Denison remains

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		recovery of groundwater recharge due to potential changes in climate conditions. Recommendations: - MN-S requests that interaction between climate change scenarios and groundwater modelling should be included in the Final EIS.	(March 4, 2023) (Public Comment #560)	<p>potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early all, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late all, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late- century periods. If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure.</p> <p>The groundwater model will be updated over the course of mine life to among other things support the decommissioning plan that will consider recovery in the mining zone. Such model scenarios would incorporate up to date information with respect to climate change and the potential effects of climate change on the groundwater environment.</p>		as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	March 31, 2025	willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Other	It is unclear if the statements made about full recovery and 90% recovery are defensible given that calibrated hydraulic conductivity values, as shown in Table 2-2 (p. 2.7), for the lower sandstone aquifer ranges over 2 orders of magnitude, and the ore zone calibrated hydraulic conductivity over nearly 5 orders of magnitude, and that no range in hydraulic conductivity is reported for the desilicified sandstone aquifer (i.e., a single calibration value is reported). Recommendations: - Denison should provide simulations that consider the full range of calibrated hydraulic conductivity values in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #561)	<p>The calibrated hydraulic conductivity values are consistent with observed data. The calibrated K value for the intermediate aquitard was 1x10-8 m/s, which is in the middle of the range of values reported from point testing within this unit (Range: 10-10 to 3.8x10-6 m/s), and similar to the geomean value (8.4 x10-9 m/s). Thus, the calibrated K value is within a factor of 1.2 of, and higher than, the geomean value. The hydraulic conductivity value for the Intermediate Aquitard is similar to that applied by AECL at Cigar Lake (5x10-8 m/s). Similarly, the K values applied for the Upper and Lower Sandstone Aquifer units are consistent with the field measured values, particularly for this fractured rock environment. The high end of the packer tested range of K values varied by 2 orders of magnitude between the aquifer and aquitard units, which is consistent with the definition of aquifer / aquitard differentiation. The interpretation of an aquifer-aquitard-aquifer sequence is consistent with the AECL interpretation of the Athabasca Sandstone at the Cigar Lake mine.</p> <p>When packer testing in fractured rock, the hydraulic conductivity associated with any test depends on whether the packed zone contains a continuous fracture set. However, for the unit as a whole, it is important that the model represent the hydraulic conductivity (or transmissivity) representative of the interconnected fracture network. Thus, it is appropriate that the applied hydraulic conductivity values within the aquifers are consistent with the higher end of tested conductivity values within those units. Within aquitard units, having singular higher conductivity fracture values from packer tests that test local fractures only, does not necessarily indicate large-scale transmissivity.</p> <p>A fault feature is suspected along the western perimeter of the Lower</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.

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				<p>Sandstone Aquifer near Kratchkowsky and Williams Lake, located 1.5 km west of the mine site (also as depicted on the Hydrogeological Conceptual Site Model). This feature was interpreted to exist based on the similarity in groundwater levels between deep and shallow aquifers in that particular area (c.f., water levels along the creek south of Williams Lake and within GWR-029, as well as water levels recorded in open boreholes near Kratchkowsky Lake), as well as geochemistry in GWR-029. The geochemistry and water levels show in the vicinity of GWR-029 are different, however, than conditions within the Lower Sandstone aquifer further east of this area, above and east of the Phoenix deposit.</p> <p>The effect of the fault feature along the western edge of the Lower Sandstone aquifer was incorporated within the numerical model both through enhanced hydraulic conductivity parameters, as required to match observed water levels, and boundary conditions applied to introduce as much inflowing water to the Lower Sandstone Aquifer as the water level data suggest is reasonable.</p>				
Métis Nation – Saskatchewan	Other	<p>No time period is provided to reach acceptable levels of remaining contaminants or effective remediation accomplished in order to leave the area in a pre- mining condition.</p> <p>Recommendations:</p> <ul style="list-style-type: none"><li>- Denison needs to provide more clarity on what the expected time period to reach acceptable levels of remaining contaminants or effective remediation in order to leave the area in a pre-mining condition. This unknown time frame may play into the viability of remediation and final closure costing.</li></ul>	<p>MN-S Public Comments (March 4, 2023) (Public Comment #562)</p>	<p>Groundwater remediation targets provided in the draft EIS were from derived from metallurgical test results completed from 2017 to 2021 with over 125 kg of material recovered from Phoenix deposit that underwent leaching and neutralization test work (see response to IR-67). In 2022 and 2023, metallurgical test work continued to further optimize remediation and strategies and confirm test work results presented in the draft EIS. It is expected that metallurgical test work will continue in the future to further optimize remediation targets, and this will be advanced through updates to the Decommissioning Plan. The Feasibility Field Test (FFT) provided additional confirmation that pH target and remediation targets could be met. Data gathered during the neutralization phase of the FFT provide confidence that groundwater targets proposed in the draft EIS can be met technically and economically. Based on laboratory testing and the results of the 2022 field testing, subsurface remediation is planned to consist of rinsing the ore zone with 35 pore volumes of fresh water, slowly raising the pH and then pumping about 75 pore volumes of basic solution through the same portion of the ore zone. This basic solution will in effect further raise the pH to a level that impedes further leaching of the deposit and reduces aqueous concentrations of contaminants of concern to below their environmental target levels.</p> <p>Refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more</p>	<p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p>	<p>This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.</p>	<p>As per MN-S letter dated March 31, 2025</p>	<p>Denison remains willing to engage on this topic as needed in the future.</p>



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				<p>refined as the Project advances.</p> <p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p>				
Métis Nation – Saskatchewan	Other	<p>Climate change as a variable does not appear to have been incorporated into the modelling.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> <li>- Denison needs to provide more clarity in the Final EIS on how climate change as a variable has been incorporated into the ground water modelling as climate changes scenarios and effects on the groundwater could affect the closure pathway.</li> </ul>	MN-S Public Comments (March 4, 2023) (Public Comment #563)	<p>The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early all, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late all, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late- century periods. If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure.</p> <p>The groundwater model will be updated over the course of mine life to among other things support the decommissioning plan that will consider recovery in the mining zone. Such model scenarios would incorporate up to date information with respect to climate change and the potential effects of climate change on the groundwater environment.</p>	N/A	This has not been identified as an outstanding issue by the MN-S in its correspondence dated March 31, 2025.	As per MN-S letter dated March 31, 2025	Denison remains willing to engage on this topic as needed in the future.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	<p><b>March 31, 2025 letter from MN-S</b></p> <p>Concerns regarding stigma: contamination and residual impacts: The Métis community has experienced the effects of uranium mining in Saskatchewan for generations. We believe that there is knowledge that can be collected from Métis elders and citizens, regarding their experience with the effects of uranium mining, that can help us to better predict how Métis land and resource use will change following the development, and eventual reclamation, of the Project. We know from previously held discussions that Métis citizens have avoided harvesting and trapping near Cluff Lake. We would like to engage in a systematic study to help capture these outcomes so that the foreseeable impacts of the stigma associated with the Project can be understood by the CNSC.</p>	MN-S Letters, March 31, 2025 and July 31, 2025)	<p><b>June 3, 2025 (Denison response to March 31, 2025 MN-S Letter)</b></p> <p>In the JWG Meeting, we discussed the concerns expressed by members of the Métis community regarding their perceptions of potential contamination from the Project. We understand that these include concerns related to groundwater, drinking water quality, and the disposal of radioactive waste. The MN-S also expressed that stigma from the Project’s perceived contamination and residual impacts may affect Métis citizens’ use of the Métis Homeland.</p> <p>To respond to the MN-S’ concerns, we have included information relevant to these matters in addition to summarizing our discussion at the JWG Meeting.</p> <p><u>(a)Assessed potential impacts to groundwater</u></p> <p>Throughout the environmental assessment (“EA”) of the Project, Denison conducted extensive environmental and technical studies to evaluate the</p>	N/A	Ongoing – Denison is committed to working toward reaching a resolution on these issues.	Response from MN-S provided July 31, 2025	Discussions continue with MN-S about working toward a resolution on these issues.



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		<p>Funding for such a study has also been requested from Saskatchewan, so work could be coordinated. The process for such a study will include the following elements, with appropriate funding to carry them out:</p> <ul style="list-style-type: none"><li>community interviews or meetings as appropriate in communities close to existing impacts;</li><li>community interviews or meetings as appropriate in communities which utilize the Project area, as identified in previous preliminary work by the MN-S; and</li><li>review of prior research and best practices on managing stigma and risk associated with uranium mining contamination.</li></ul> <p>With the proposed study in-hand, we can also work with CNSC and Denison technical staff to identify and discuss opportunities to help minimize stigma (if any), such as through Project changes, Métis involvement in Project operations and monitoring, and Métis involvement in closure processes and decisions. These discussions can be conducted through several channels, including:</p> <ul style="list-style-type: none"><li>technical discussions;</li><li>leadership discussions, involving leadership from the MN-S and the 13 Métis Locals; and</li><li>community workshops.</li></ul> <p><b>July 31, 2025 (MN-S Response to June 3, 2025 Denison Letter)</b> Denison’s Responses to Métis Concerns are Insufficient In the June 3 Letter, Denison responds to Métis concerns largely by reiterating the conclusions of the Final Environmental Impact Statement (“EIS”) for the Project. Denison relies on the conclusions of the EIS to assert that the Project will not result in significant residual effects to, or compromise, groundwater, human health, safety, fish health and populations, Whitefish Lake or downstream in Russell Lake, or woodland caribou.</p> <p>Denison’s approach to addressing Métis concerns is insufficient in several ways, as follows.</p> <p>Denison cannot rely on the EIS to address Métis concerns because the EIS did not appropriately incorporate Métis knowledge. For instance, the Preliminary Métis Knowledge Study is not cited as a “Source of Indigenous Knowledge” in any technical sections of the updated EIS pertaining to groundwater, terrestrial environment, or aquatic environment.</p> <p>More than just relying on the EIS however, Denison’s response to the MN-S’ concerns in the June 3 Letter is insufficient because Denison does not engage with the accommodations which the MN-S has requested:</p> <p>(a) The June 3 Letter responds to Métis concerns regarding the permeability of the basement rock<sup>2</sup> but does not directly</p>		<p>potential adverse impacts of the Project. These studies, which are integrated into the Project’s final Environmental Impact Statement (“EIS”), demonstrate the Project can be constructed, operated, and decommissioned in a manner that is not likely to cause significant adverse effects to the surrounding biophysical or human environments.</p> <p>In support of this conclusion, and as explained at the JWG Meeting by Janna Switzer (Denison’s Vice President Environment, Sustainability &amp; Regulatory), Denison undertook numerous studies related to potential Project impacts on groundwater. In particular, Denison assessed the potential impacts of the Project on groundwater as a pathway to surface water, and the associated potential for changes in groundwater inputs to surface water to influence fish and fish habitat, sediment quality, vegetation, wildlife, human health, and Indigenous land and resource use (including Métis land and resource use). To evaluate how constituents of potential concern (“COPC”) dissolved into groundwater may interact with the environment after remediation of groundwater in the mining area, Denison applied a rigorous numerical model of groundwater flow and chemical COPC behaviour along the groundwater flow path as a predictive tool. As Ms. Switzer shared at the JWG Meeting, the results supported the conclusion that, with the implementation of appropriate mitigation, the potential impacts of the Project on groundwater are not expected to cause adverse residual effects. Further, concentrations of COPCs are predicted to remain at levels that would not result in environmental risk.</p> <p>Changes to groundwater as a result of increases in constituent concentrations are predicted to be negligible to low in magnitude and limited to the local study area. Accordingly, Denison has concluded the Project would not result in significant residual effects to groundwater.</p> <p>Denison understands and respects the interests and concerns of the MN-S regarding the potential impacts of the Project on groundwater. As part of our response to these concerns, Denison is committed to providing the MN-S with the outcomes of monitoring data in respect of this area and engaging with the MN-S on such information.</p> <p><u>(b)Assessed potential impacts to human health as a result of surface water ingestion and use</u></p> <p>Denison assessed the potential impacts of the Project regarding the ingestion of surface water as part of the human assessment in the EA. The main input into the aquatic environment which could affect human health is the release of treated effluent into Whitefish Lake. To measure these potential impacts, Denison undertook a conservative screening of predicted reasonable upper bound treated effluent concentrations against surface water quality guidelines. The screening values in the EIS are based on the most restrictive provincial or federal surface water quality guidelines (to the extent these guidelines exist for the COPCs). Based on these and other studies, and the implementation of mitigation measures, we concluded that the Project could be constructed, operated, and decommissioned without compromising safety to human health.</p>				

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		<p>address Métis knowledge on this topic or discuss the possibility, practicality, and advisability of the MN-S’ requested accommodation of freezing under the deposit.</p> <p>(b) The Métis have significant concerns with contamination from the Project and the impacts, both real and perceived, on lands, air, water and wildlife of the Métis Homeland, particularly fish. The June 3 Letter responds to these concerns but does not address the feasibility or utility of the accommodations of a “no contaminant increase” standard or “no selenium” standard, both requested by the MN-S.</p> <p>(c) In the June 3 Letter, Denison acknowledges that “perceptions around the quality of the resource could still change Métis behaviour.<sup>5</sup> However, Denison does not address the MN-S’ requested steps to properly assess stigma impacts, including the importance of undertaking a study on the continuing effects of the Cluff Lake mine site on Métis harvesting and potential methods of mitigating such effects, which may help to assess how the Project may impact Métis land use and connections to the land during operation and after closure.</p> <p>(d) In the June 3 Letter, Denison reiterates its offer to consider MN-S input on Caribou mitigation.<sup>7</sup> The MN-S appreciates this offer and is working to develop recommendations on Caribou mitigation. However, as the MN-S detailed in the JWG Meeting, the MN-S cannot develop those recommendations without community engagement. Neither Denison nor the MOE have provided funding for such engagement. Moreover, Denison “encourages the MN-S to participate” in Saskatchewan’s woodland caribou mitigation framework advisory committee.<sup>8</sup> To date, the advisory committee has not addressed distinct Métis challenges (and instead seeking to integrate Métis input into the current framework designed for First Nations). Denison should not seek to rely on the provincial caribou mitigations frameworks as effective mitigation for the Project’s impacts on caribou.</p> <p>In addition to failing to engage with the MN-S requested mitigations, Denison’s statements in the June 3 Letter understate Project impacts on Métis rights and interests. Denison’s statements in the May 5 Letter were significantly more detailed than those it has now made in the June 3 Letter. As a result, the June 3 Letter omits the context behind several of Denison’s assertions. The May 5 Letter details the facts underlying the MN-S’ concerns:</p> <p>The May 5 Letter confirms that Project effluent will contain a number of constituents above background levels, and these constituents will, in initial mixing, exceed respective water quality objectives. It also confirms that “the Project will release small quantities of selenium.”</p> <ul style="list-style-type: none"><li>• The May 5 Letter acknowledges “that both Project-related and cumulative effects would accrue to Woodland Caribou</li></ul>		<p>Further, changes to surface water levels and flows were assessed to be well below criteria identifying a residual effect during all phases of the Project. Interactions of the Project with surface water were highly localized to the local study area, specifically to Whitefish Lake. Project-related interactions do not extend beyond the local study area into the regional study area.</p> <p>Denison understands and respects the interests and concerns of the MN-S regarding the potential ingestion and use of surface water in and around the Project area. As part of our response to these concerns, Denison is committed to providing the MN-S with the outcomes of monitoring data in respect of this area and engaging with the MN-S on such information.</p> <p><u>(c)Disposal of radioactive waste</u></p> <p>The MN-S has expressed concern that the EA did not include an assessment of decommissioning plans for radioactive waste stored at the Project.</p> <p>Radioactive waste that is composed of special waste (drill cuttings) and/or precipitate is expected to be sent off site for processing at an eligible licensed facility. Other Project-related materials which are contaminated from operational activities that cannot be cleaned to pass standard radiological clearance will remain on-site in an industrial landfill or will be transported in accordance with appropriate regulations and disposed off-site at an approved facility. The industrial landfill would continue to hold such materials during and potentially following decommissioning. Denison will install a double lined pad with leak detection and collection system between the primary and secondary geosynthetic composite liners. This design is the best available technology and can safely operate for several hundred years with the proper installation and maintenance. Upon closure of the Project-site, the industrial landfill will be covered with an engineered impermeable liner system to minimize infiltration of precipitation into the containment system. Performance of the containment system will be monitored through a network of groundwater monitoring wells located around the industrial landfill.</p> <p>Denison understands and respects the interests and concerns of the MN-S regarding the disposal of radioactive waste from the Project. As part of our response to these concerns, Denison is committed to providing the MN-S with the outcomes of monitoring data in respect of this area and engaging with the MN-S on such information.</p> <p><u>(d)Potential stigma and Métis use of land in and around the Project</u></p> <p>In the JWG Meeting, we discussed the MN-S’ concerns regarding potential stigma from the Project and the related impacts to Métis citizens’ use of lands and waters in and around the Project. We understand that the MN-S has requested funding from the Province of Saskatchewan (the “Province”) to carry out additional studies to identify and discuss opportunities to help minimize potential stigma, such as through Project changes, Métis involvement in Project operations and monitoring, and Métis involvement in closure processes and decisions.</p>				

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		<p>(and its habitat)” and that the MN-S has accurately described the sources of those impacts.</p> <ul style="list-style-type: none"><li>Denison has omitted these facts from the June 3 Letter. The MN-S has legitimate Project-related concerns that must be appropriately considered and accommodated.</li></ul>		<p>Denison collected information from Métis and other Indigenous peoples over the course of the EA to understand traditional and ongoing uses of areas in and around the Project. As discussed further below, the MN-S identified Whitefish Lake as an area potentially impacted by the Project and has expressed concerns related to Métis’ fishing activities in the lake and the potential associated stigma therein.</p> <p>The information shared with Denison during the EA and incorporated into the final EIS demonstrates there is only occasional, and no consistent, use of Whitefish Lake. Nevertheless, Denison took a conservative approach in the EA and conducted its assessment of Project-related effects to Whitefish Lake as if it was an actively-used area. Even with this approach, as Ms. Switzer explained at the JWG Meeting, Denison concluded the potential effect to fishers (if any) would be undetectable because there are no predicted Project-induced changes to the abundance and distribution of fish, or indications of potential radiological exceedances.</p> <p>Denison understands that perceptions around the quality of the resource could still change Métis behaviour. At the JWG Meeting, Denison reaffirmed the importance of continuing to assess how the Project may affect Métis citizens’ behaviour in and around the Project area, and how the perception of risk and impressions of past mining projects in the region generally impact pre-existing conceptions of the Project.</p> <p>Denison factored such potential impacts into its residual effects assessment in the EA and integrated mitigation and monitoring measures to address these concerns. The monitoring programs are ongoing and facilitate the sharing of information relevant to potential Project impacts, including qualitative and quantitative assessments. Throughout the EA, as well as in response to the MN-S’ comments on the Project’s draft EIS, Denison has committed to sharing this monitoring information with the MN-S for its review and for its potential distribution to Métis citizens. To this end, information from these monitoring programs will be shared with the MN-S.</p> <p>At the JWG Meeting, Denison and the MN-S discussed the value in making information from these monitoring programs more accessible to MN-S citizens. Denison looks forward to collaborating with the MN-S to develop the best method to continue sharing such monitoring information.</p>				
Métis Nation – Saskatchewan	Other	<p><b>March 31, 2025 letter from MN-S</b></p> <p>Basement rock permeability: Métis elders and other Citizens have expressed their concern with Denison’s assertion that the basement rock under the Project is impermeable, and that hazardous materials will be fully contained by the frozen curtain walls.</p> <p>The MN-S proposes that engagement to address these concerns begin with community meetings or community interviews as appropriate to collect Métis knowledge within the 13 Métis communities relevant to basement rock permeability.</p>	MN-S Letters, March 31, 2025 and July 31, 2025)	<p><b>June 3, 2025 (Denison response to March 31, 2025 MN-S Letter)</b></p> <p>The Project’s freeze wall will be keyed into the basement rock to avoid faults, fractures, or other avenues that would otherwise allow contaminants to travel under the freeze wall. As outlined in the final EIS, the freeze wall will be established by drilling vertical holes from the surface into the basement rock (over 400 m below surface). The freeze holes will be spaced approximately 5 to 10 m apart. Over 300 freeze holes are estimated for the Project. The ground will be frozen from the surface down into the low permeability basement rock to create a continuous wall around the mining area that is completely contained from the surrounding regional groundwater. The result is a closed-loop system that prevents the freeze wall brine from entering the environment.</p>	N/A	Ongoing – Denison is committed to working toward reaching a resolution on these issues.	Response from MN-S provided July 31, 2025	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>MN-S will then have time to review the gathered information and meet with CNSC technical staff to evaluate current understandings of basement rock permeability and mitigation measures. These discussions can include identifying and considering alternative Project design options, such as freezing underneath the ore body.</p> <ul style="list-style-type: none"><li>Following these discussions and the identification of alternatives, we would propose further meetings:</li><li>leadership discussions, involving leadership from the MN-S and the 13 Métis Locals; and</li><li>community workshops.</li></ul> <p><b>July 31, 2025 (MN-S Response to June 3, 2025 Denison Letter)</b> Denison appears to disagree with itself between the May 5 Letter and the June 3 Letter regarding testing for basement rock permeability. The MN-S requests that Denison clarify the following apparent inconsistency.</p> <p>In the June 3 Letter, Denison confidently asserts that “A substantive testing regime conducted by Denison demonstrates that the basement rock below the uranium deposit at the Project serves as a natural aquitard.” [emphasis added]</p> <p>The May 5 Letter however confirmed that such testing is “challenging” or “technically challenged” and accordingly Denison could only state that “limited groundwater is expected” [emphasis added].</p> <p>Denison’s apparently contradictory statements regarding the basement rock permeability assessment conducted by Denison are concerning. The MN-S requests further clarity on Denison’s position on basement rock permeability. “technically challenged” and accordingly Denison could only state that “limited groundwater is expected” [emphasis added].</p>		<p>The foundation of the basement rock is composed of thick, ancient rocks (e.g., metamorphic and igneous), which form the crust of continents. A substantive testing regime conducted by Denison demonstrates that the basement rock below the uranium deposit at the Project serves as a natural aquitard. An aquitard is a geologic formation that may contain groundwater but is not capable of transmitting significant quantities of groundwater under normal hydraulic gradients, and that may function as a confining bed.</p> <p>In the JWG Meeting, we discussed additional opportunities to incorporate traditional knowledge perspectives into technical understandings of the freeze wall mining process. Denison would be pleased to receive relevant Métis traditional knowledge in addition to the information already provided by the MN-S in its Métis knowledge study for the Project. To this end, we encourage the MN-S to share the traditional knowledge possessed by Métis elders which relates to the basement rock, to the extent the MN-S is interested in doing so. We can then consider that traditional knowledge in the context of the information presented in the EIS.</p> <p>We remain committed to collaborating with the MN-S to support its understanding of the Project and the freeze wall technology. To assist the MN-S and its citizens’ with this process, we would be pleased to arrange a meeting between the MN-S and Greg Newman - the Project’s freeze wall subject mater expert.</p>				
Métis Nation – Saskatchewan	Other	<p><b>March 31, 2025 letter from MN-S</b> Losses to Métis title, the value of the uranium resource, and the socio-economic value through the extraction of that resource.: As articulated throughout our correspondence to the Crown, the Project will have significant adverse effects on the Métis, and specifically the Métis land claim.</p> <p>We would like to inform our discussions with CNSC by undertaking a study on the socio-economic value that the Métis are being deprived of by Denison undertaking the Project, instead of the Métis undertaking the Project once the land claim is settled. This lost socio-economic value includes the loss of the opportunities to alter the Project’s scope and operations to maximize capacity development opportunities for the Métis (including through employment, training, and business development), to undertake the Project in a way that seeks to minimize socio-economic stress</p>	MN-S Letters, March 31, 2025 and July 31, 2025)	<p><b>June 3, 2025 (Denison response to March 31, 2025 MN-S Letter)</b> While we are unable to comment on the Province’s position regarding this matter, we note that as part of the final EIS, Denison completed a socioeconomic study to assess broader socioeconomic value impacts of the Project including the potential loss of resources.</p>	N/A	Ongoing – Denison is committed to working toward reaching a resolution on these issues.	Response from MN-S provided July 31, 2025	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>on our communities, and to minimize the adverse effects on the lands, water and wildlife that occupy our land claim.</p> <p>Funding for such a socio-economic study has also been requested from Saskatchewan, so work could be coordinated on this. MN-S is not aware of similar studies being done, so this work may involve several meetings with technical experts, MN-S environment and consultation administrators, and potentially MN-S leadership to discuss the scope and considerations for such a study. The study should also include community feedback to help ensure that the results are accurate and meaningful.</p> <p>Once the socio-economic study is available, we would look to engage with CNSC, and potentially Denison, to help inform the Crown of the lost socio-economic potential of the Métis land claim. We would also welcome opportunities to engage with CNSC and Denison to identify appropriate accommodation methods. It is our hope that CNSC and Denison would engage in these discussions with an aim of securing the free, prior, and informed consent of the Métis</p> <p>In addition to the socio-economic study, we would like to work with CNSC and Denison to better understand the lost financial value of the resource that will be extracted from the Métis homeland. Developing this understanding may require the retention of experts, and the disclosure of updated information by Denison regarding its resource modelling. If necessary, we are willing to consider a non-disclosure agreement or similar confidentiality commitments to protect information that Denison deems to be sensitive.</p> <p>Once a study on lost economic value is complete, we would look to engage with CNSC and Denison (and potentially Saskatchewan) to understand if there are methods for minimizing the adverse effects on the Métis. Such opportunities may include the provision of guarantees or indemnities of the lost value that can be realized when the Métis establish Aboriginal title. Alternatives, such as resource revenue sharing, may also help to mitigate the adverse effects on the Métis land claim, but the acceptability of any such sharing would be subject to input from the Métis Locals..</p> <p><b>July 31, 2025 (MN-S Response to June 3, 2025 Denison Letter)</b> In the June 3 Letter, Denison states that it “completed a socioeconomic study to assess broader socioeconomic value impacts of the Project including the potential loss of resources”. However, the reference provided, to the EIS, p. 3-4, addresses Denison’s approach to Indigenous knowledge and only refers to a socioeconomic study conducted by English River First Nation. The MN-S is not aware of Denison conducting a socioeconomic study which included Métis involvement. The MN-S also not aware of</p>						



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		any socioeconomic study being done for the Project, with or without Métis involvement, which calculated the loss to the Métis title claim from the Project proceeding. The MN-S requests that Denison clarify what socioeconomic studies it has conducted, with the involvement of which parties, and whether these studies assessed lost value to the Métis title claim and lost socio-economic opportunities by the Métis as a result of the Project advancing while the title claim remains outstanding.						
Métis Nation – Saskatchewan	Other	<p><b>March 31, 2025 letter from MN-S</b> Effects on harvesting, particularly fishing, through impacts to Whitefish Lake and Russel Lake: We have previously identified our concerns that the Project will adversely affect the animals, lands and waters of the Métis Homeland and land claim.</p> <p>Having already expressed our concerns, including with the effective extinguishment of nearby Métis commercial fishing rights, the release of known contaminants into waterways (for example selenium), and the continuing obstacles to rehabilitating the caribou population and the Métis reliance on caribou, we would like CNSC and Denison to come to the table to discuss potential mitigation measures to address these concerns.</p> <p>If robust and meaningful mitigation measures can be identified, we would propose an opportunity to bring these measures back to Northern Regions I and III and our 13 Locals, to secure their feedback and further inform our discussions.</p> <p>Ultimately, through appropriately resourced discussions, we would like to reach a conclusion on fitting accommodation measures that can help inform a decision by the Métis Nation to provide its free, prior, and informed consent.</p> <p><b>July 31, 2025 (MN-S Response to June 3, 2025 Denison Letter)</b> This Denison’s Responses to Métis Concerns are Insufficient In the June 3 Letter, Denison responds to Métis concerns largely by reiterating the conclusions of the Final Environmental Impact Statement (“EIS”) for the Project. Denison relies on the conclusions of the EIS to assert that the Project will not result in significant residual effects to, or compromise, groundwater, human health, safety, fish health and populations, Whitefish Lake or downstream in Russell Lake, or woodland caribou.</p> <p>Denison’s approach to addressing Métis concerns is insufficient in several ways, as follows.</p> <p>Denison cannot rely on the EIS to address Métis concerns because the EIS did not appropriately incorporate Métis knowledge. For instance, the Preliminary Métis Knowledge Study is not cited as a “Source of Indigenous Knowledge” in any technical sections of the</p>	MN-S Letters, March 31, 2025 and July 31, 2025)	<p><b>June 3, 2025 (Denison response to March 31, 2025 MN-S Letter)</b> Denison started collecting data in the Project area and the Whitefish Lake and Russell Lake areas prior to the initiation of its EA in 2019, as early as 2016. To this end, Denison assessed commercial activity from fishers in the area and the potential impacts of the Project on commercial fishers. Based on these assessments, we determined the Project would not result in significant adverse effects to Whitefish Lake or downstream in Russell Lake. However, Denison still factored the Project’s potential impact on harvesting activities into its mitigation planning.</p> <p>With respect to woodland caribou, the Project is located in a provincially defined caribou range where the population is deemed to be stable and caribou habitat disturbance is within the federal threshold. Studies conducted and integrated into the EIS support the conclusion that effects of the Project on woodland caribou will be not significant. The residual effects of alteration and/or loss of available habitat and of change in mortality are not expected to affect the sustainability or integrity of the regional woodland caribou population. To this end, Projects impacts to caribou from the removal of habitat will not increase disturbance beyond the federal threshold and caribou populations will continue to be self-sustaining. Our evaluations indicate that effects from the Project would be an avoidance of use by caribou to other forested areas within the range, and the only possible direct mortality impact for woodland caribou may result from collision with a vehicle.</p> <p>Denison has committed to offset the habitat removed (with a buffer) and is developing a caribou management plan with the Province. As part of the Province’s boreal woodland caribou management efforts, it is working with industry to develop effective and practical approaches to mitigate potential impacts to woodland caribou. In the Province’s hierarchy of controls for caribou habitat management, “offset” is the restoration of habitat outside a project’s footprint which is used to compensate project impacts where such impacts result in a loss of functional habitat for an extended period of time.</p> <p>As stated in the EIS, Denison and the Province will develop a Draft Caribou Mitigation Plan, which will include a detailed assessment of the necessary habitat offset. This offset has not been settled. The EIS outlines the engagement activities Denison has undertaken with regulatory agencies to determine the woodland caribou habitat offset calculation framework.<sup>26</sup> Denison understands the MN-S has been invited to be a part of the Province’s advisory committee to develop the woodland caribou mitigation framework but has not yet participated. Denison encourages the MN-S to participate with</p>	N/A	Ongoing – Denison is committed to working toward reaching a resolution on these issues.	Response from MN-S provided July 31, 2025	Discussions continue with MN-S about working toward a resolution on these issues.



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		<p>updated EIS pertaining to groundwater, terrestrial environment, or aquatic environment.</p> <p>More than just relying on the EIS however, Denison’s response to the MN-S’ concerns in the June 3 Letter is insufficient because Denison does not engage with the accommodations which the MN-S has requested:</p> <p>(a) The June 3 Letter responds to Métis concerns regarding the permeability of the basement rock<sup>2</sup> but does not directly address Métis knowledge on this topic or discuss the possibility, practicality, and advisability of the MN-S’ requested accommodation of freezing under the deposit.</p> <p>(b) The Métis have significant concerns with contamination from the Project and the impacts, both real and perceived, on lands, air, water and wildlife of the Métis Homeland, particularly fish. The June 3 Letter responds to these concerns<sup>3</sup> but does not address the feasibility or utility of the accommodations of a “no contaminant increase” standard or “no selenium” standard, both requested by the MN-S.</p> <p>(c) In the June 3 Letter, Denison acknowledges that “perceptions around the quality of the resource could still change Métis behaviour.<sup>5</sup> However, Denison does not address the MN-S’ requested steps to properly assess stigma impacts, including the importance of undertaking a study on the continuing effects of the Cluff Lake mine site on Métis harvesting and potential methods of mitigating such effects, which may help to assess how the Project may impact Métis land use and connections to the land during operations and after closure.</p> <p>(d) In the June 3 Letter, Denison reiterates its offer to consider MN-S input on Caribou mitigation.<sup>7</sup> The MN-S appreciates this offer and is working to develop recommendations on Caribou mitigation. However, as the MN-S detailed in the JWG Meeting, the MN-S cannot develop those recommendations without community engagement. Neither Denison nor the MOE have provided funding for such engagement. Moreover, Denison “encourages the MN-S to participate” in Saskatchewan’s woodland caribou mitigation framework advisory committee.<sup>8</sup> To date, the advisory committee has not addressed distinct Métis challenges (and instead seeking to integrate Métis input into the current framework designed for First Nations). Denison should not seek to rely on the provincial caribou mitigations frameworks as effective mitigation for the Project’s impacts on caribou.</p> <p>In addition to failing to engage with the MN-S requested mitigations, Denison’s statements in the June 3 Letter understate Project impacts on Métis rights and interests. Denison’s statements in the May 5 Letter were significantly more detailed than those it has now made in the June 3 Letter. As a result, the June 3 Letter omits the context behind several of Denison’s</p>		<p>the Province in this process so that its input can be considered in the development of this framework.</p> <p>During the JWG Meeting, we asked the MN-S whether there are any obstacles to rehabilitating caribou habitat which Denison can address, to which the MN-S did not provide an answer at the time. We remain open to receiving feedback from the MN-S on this matter. As noted above, Denison is currently engaging with the Province to develop the Project’s Draft Caribou Mitigation Plan. We would be pleased to receive input from the MN-S regarding the development and implementation of this plan.</p>				

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		<p>assertions. The May 5 Letter details the facts underlying the MN-S’ concerns: The May 5 Letter confirms that Project effluent will contain a number of constituents above background levels, and these constituents will, in initial mixing, exceed respective water quality objectives. It also confirms that “the Project will release small quantities of selenium.”</p> <ul style="list-style-type: none"><li>• The May 5 Letter acknowledges “that both Project-related and cumulative effects would accrue to Woodland Caribou (and its habitat)” and that the MN-S has accurately described the sources of those impacts.</li></ul> <p>Denison has omitted these facts from the June 3 Letter. The MN-S has legitimate Project-related concerns that must be appropriately considered and accommodated.</p>						
Métis Nation – Saskatchewan	Other	<p><b>March 31, 2025 letter from MN-S</b> Monitoring of ongoing impacts: The Project will be developed within the Métis Homeland and within the Métis land claim specifically. For this reason, the MN-S seeks to be robustly and meaningfully engaged in the oversight of the Project throughout its operations lifespan and into closure.</p> <p>We would like to work with CNSC to discuss CNSC oversight and monitoring structures and opportunities for involvement of Métis in those structures, including participation in decision making and access to Project data, including monitoring data.</p> <p>Once there is clarity on the depth of involvement available to the Métis through the lifespan of the Project, we intend to present that material to Northern Region I and III and our 13 Locals, and it can form a part of the free, prior and informed consent process (and ultimately, decision).</p> <p><b>July 31, 2025 (MN-S Response to June 3, 2025 Denison Letter)</b> In the June 3 Letter, Denison makes commitments to collaborative monitoring development it did not commit to when writing to Saskatchewan in the May 5 Letter. The MN-S requests that Denison confirm its commitments to monitoring in collaboration with the MN-S.</p> <p>In the May 5 Letter, Denison committed only to “sharing information related to monitoring program and development, seeking feedback from the MN-S with the intent on discussing questions, concerns and opportunities and incorporating such feedback as appropriate.”<sup>17</sup> Now, in the June 3 Letter, Denison commits to “providing the MN-S with the outcomes of monitoring data”, to “collaborate regarding the Project’s monitoring programs” and to “collaboratively develop” methods for communicating monitoring information, within the first year of Project operations.</p>	MN-S Letters, March 31, 2025 and July 31, 2025)	<p><b>June 3, 2025 (Denison response to March 31, 2025 MN-S Letter)</b> Denison understands the importance of undertaking monitoring at the Project and enabling access to information which is discernable and transparent. This includes facilitating a process to discuss challenges and concerns of Métis citizens. The need for an effective communication process between the parties was a common theme at the JWG Meeting. From our perspective, Denison and the MN-S share the desire to collaboratively develop such a process to effectively communicate monitoring and other important information and to bridge scientific and traditional knowledge perspectives. At the JWG Meeting (and in prior engagement meetings with MN-S), we have discussed options to achieve this goal. Denison has also implemented a variety of communication and engagement methods in the development of the EIS and on an ongoing basis, to make information about the Project accessible to Métis citizens and others.</p> <p>Denison appreciates the feedback shared by the MN-S regarding the importance of developing an effective method to communicate Project monitoring information to Métis citizens. Denison is committed to developing this process within the first year of Project construction. We look forward to collaborating with the MN-S on this matter.</p>	N/A	Ongoing – Denison is committed to working toward reaching a resolution on these issues.	Response from MN-S provided July 31, 2025	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>The MN-S welcomes these more detailed and effective commitments. Denison did not however confirm these commitments in writing to the Saskatchewan Crown. The MN-S therefore requests that Denison clarify its planned approach to collaborative monitoring with the MN-S and invites Denison to negotiate binding commitments that can be relied upon by the MN-S.</p> <p>In any event, monitoring alone is not sufficient to address MN-S concerns about the effects of the Project on the lands, waters, plants and animals of the Métis Homeland and the exercise of Métis rights.</p>						

Appendix C-10: YNLR Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justificati on of Status	Ongoing Resolution of Concerns (if required)
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	Historically, there has always been interaction between northern Saskatchewan and western Saskatchewan communities.	ROC 78 ROC 83	Thank you, noted.	N/A	Based on Denison's understanding of the comment, the comment made has a relationship to similar-type public comments made by YNLR on the draft EIS. Denison has responded to the YNLR on all draft EIS public comments, by providing background information, clarification on assumptions and approach taken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<b>YNLR Comment March 4, 2023</b> YNLR supports this built-in precautionary approach to the Project's risk assessment. However, given the lengthy timeline of the Project, YNLR would like to see that lost (i.e., unmitigated) wildlife and fisheries habitat be offset in some manner. A response to this should be approached through an anticipated impact benefit agreement.	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (submitted in response to provincial and federal EIS review comments) that	Denison remains committed to engaging with the YNLR on these concerns.	Denison understands that YNLR expects to inform Denison that this	As per YNLR letter to Denison dated	Denison remains committed to engaging with the YNLR to come to resolution.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p>YNLR is interested in creating more formal processes to achieve this, such as the signing of an impact benefit agreement.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>	(Public Comment #378)	<p>includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment.</p> <p>It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>No other specific needs for "offset" have been identified based on the effects assessment.</p> <p>Denison will continue to engage with YNLR on topics of interest.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 378. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b> During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR's review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>		concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	December 17, 2024	

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justificati on of Status	Ongoing Resolution of Concerns (if required)
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<p><b>YNLR Comment March 4, 2023</b></p> <p>YNLR concerns:</p> <ul style="list-style-type: none"><li>Indigenous People, communities, and organizations YNLR represents are rights holders, and are not to be arbitrarily grouped and treated as non-rights holders. This is an important distinction, as the rights they hold are constitutionally protected. This must be respected and recognized in the ongoing dialogue between the company and Indigenous Peoples through their chosen representatives, like YNLR.</li><li>The Athabasca Denesų́líné people are rights holders and not stakeholders with respect to the Project. These rights include full access and use of the natural resources of the area. Any proposed infringement on these rights by the Project will need to be discussed well ahead of the Project's start date.</li></ul> <p>The EIS minimizes effects of Lands and Waters availability and access on northern residents and Indigenous Peoples. Any impairment to the ability of Indigenous Peoples to utilize their Aboriginal and Treaty rights to the use of natural resources for their traditional activities constitutes an infringement of those constitutionally protected rights and must be justified. Rigorous examination of these impacts and negotiated compensation for these impacts should therefore be seriously considered.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment April 05, 2024)</b></p> <p>YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR confirmed that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #385)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>Denison acknowledges the comment. In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the YNLR office in a mutually agreed upon manner and will continue to do so. Denison's approach to identifying Indigenous COIs considered several factors as identified in Section 4.3.1 of the EIS. Being signatories of Treaty 10 was among, but not the sole applicable criteria, and not all Treaty 10 communities are considered as Indigenous COIs for the Project. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesų́líné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesų́líné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesų́líné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. With respect to Denison's consideration of Indigenous Knowledge shared by the Athabasca Denesų́líné knowledge sources, Denison notes that Tables 3.5-1 will be updated to better reflect where the YNLR's An Exploration of Recorded Athabasca Denesų́líné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of the Denison Mines Wheeler River Project, which was included as an Appendix to the EIS, was considered and included as Table 3.5-1 does not reflect all instances the report was utilized.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>There have been no further comments from the YNLR on EIS reference no. 385. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR.</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<p><b>YNLR Comment March 4, 2023</b></p> <p>While the overall direct footprint of the Project is relatively small, YNLR maintains that any wildlife habitat destroyed or altered by the Project should be more than offset or compensated for in some fashion. One example would be the additional disturbance created by the proposed Highway 914 extension. This needs to be accounted for</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>To be clear, Denison's proposed Project does not require any extension to the existing Highway 914. There is a Highway 914 extension project under evaluation by the Ministry of Highways, but this project is not related to or ancillary to the Wheeler River Project.</p>	Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. The detailed monitoring plans are not yet	Denison understands that YNLR expects to inform Denison that this	As per YNLR letter to Denison dated	Denison remains committed to engaging with the YNLR to come to resolution.



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		<p>by Denison.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> See above stated comments on CE, WLC and offsets.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment April 05, 2024)</b> While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development. YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed.</p> <p>YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR’s interest in the details of Denison’s caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR’s GIS based Method for Assessing Cumulative Environmental Effects).</p> <p>Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p>	(Public Comment #389)	<p>As noted in response to other comments, through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>No other specific needs for "offset" have been identified based on the effects assessment.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p>YNLR has shared comments with respect to Woodland Caribou offsets, including those related to the definition of offsets, timing, and mitigation measures as part of present-day mitigation measures for the Project, and should be applied in advance of decommissioning. YNLR has also requested to see the predecommissioning monitoring plan for containment releases. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided a document titled Summary of Monitoring, which outlines the Project’s commitments for monitoring programs for all phases of the Project from preconstruction to post decommissioning. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as</p>	<p>developed given the stage of the Project in the regulatory process.</p> <p>Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	December 17, 2024	

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		YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.		<p>more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project’s detailed decommissioning plan. Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison’s previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.</p>				

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				<p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b> During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR's review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>				
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<p><b>YNLR Comment March 4, 2023</b> Athabasca Denesųliné land uses include, but are not limited to, large and small game harvesting, gathering activities, and fishing, all of which are of key cultural importance. It is important to note that the Hatchet Lake Denesųliné First Nation and the community of Wollaston Post are situated at Wollaston Lake and given their downstream location there is potential for negative impacts.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #424)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Potential effects from the Project on surface water quality were comprehensively assessed in Section 8.2 of the draft EIS. The assessment evaluated discharge of treated effluent from the site using predictive modeling. Water treatment will be conducted in the onsite Industrial Waste Water Treatment Plant (IWWTP) and treated effluent will be tested prior to release to Whitefish Lake. Treated effluent that does not meet the effluent discharge criteria in the provincial approval to operate or effluent criteria defined in the Metal and Diamond Mining Effluent Regulations will not be released to Whitefish Lake and will be recirculated to the process water pond for eventual re-treatment in the IWWTP. In the draft EIS, Section 8.2 the predictive modeling showed that constituent concentrations including radionuclides would be below water quality objectives for the protection of aquatic life (i.e., no effects would be expected) at the outlet of Whitefish Lake. The outlet of Whitefish Lake is well upstream of the inflow of Icelfander River to Russell Lake. Since no effects on surface water quality are expected to occur in the lake closest to the Project, no effects would accrue in areas further downstream in the watershed, where contributing sub watersheds are many, many-times the size of the sub watersheds near the Project site. As such, there will be no effects on surface water quality in Wollaston Lake from the Project activities.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 424. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to</p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<p><b>YNLR Comment March 4, 2023</b> YNLR notes that while the wording for EIS Page 3-5, first paragraph, is an improvement from the May 2021 draft, it does not make clear that no Wheeler River site specific Athabasca Denesų́liné knowledge or land use studies were undertaken and that the information presented is from a variety of other projects with differing objectives and study areas. The issue is better captured/described in the EIS on page 11-39.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #425)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Acknowledged, updated language will be included in the EIS.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 425. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<p><b>YNLR Comment March 4, 2023</b> YNLR notes that as the Athabasca Denesų́liné were not considered to be an Indigenous COI, the opportunities to contribute to our knowledge to this discussion were diminished or lost. The mis-categorization as the Athabasca Denesų́line am Indigenous Community rather than as an Indigenous COI is a step backwards rather than forwards with regards to reconciliation. A letter to Denison dated July 29, 2022, YNLR critiqued the designations of COI and IC as being artificial and marginalizing. Denison responded October 28, 2022, after the submission of Wheeler River EIS with an alternative view. YNLR has other related comments on the issue.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #427)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison's approach to identifying Indigenous COIs considered several factors as identified in Section 4.3.1 of the EIS. Being signatories of Treaty 10 was among, but not the sole applicable criteria, and not all Treaty 10 communities are considered as Indigenous COIs for the Project. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesų́liné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesų́liné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesų́liné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. With respect to Denison's consideration of Indigenous Knowledge shared by the Athabasca Denesų́liné knowledge sources, Denison notes that Tables 3.5-1 will be updated to better reflect where the YNLR's An Exploration of Recorded Athabasca Denesų́liné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of the Denison Mines Wheeler River Project, which was included as an Appendix to the EIS, was considered and included as Table 3.5-1 does not reflect all instances the report was utilized. With respect to Table 3.5-2, only a limited number of data sources were considered and labelled as</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.

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		<p>February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>		<p>Local Knowledge - which is representative of information collected outside of a community-led IK process, key person interviews, or engagement events. As such, there may be limited examples in which knowledge shared constituted local knowledge, and may have been considered as either IK or engagement outcomes.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 427. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>				
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<p><b>YNLR Comment March 4, 2023</b> YNLR notes that the Athabasca Denesųliné have demonstrated land use in both the local and regional land use as per our report (YNLR 2022). YNLR has reported 371 Athabasca Denesųline Traditional Land Use and Occupancy data entries within the Denison regional study area. These include 18 points for harvesting of big game, such as barrenground caribou, moose, and woodland caribou, 29 overnight sites, 21 points where birds or eggs such as duck and spruce grouse were harvested. Other activities include furbearer harvesting, fishing, including commercial and tourism related activities such as guiding. A map of these activities is reiterated here.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #432)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Thank you, noted.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 432. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.



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Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes	<p>YNLR confirmed that this concern has been addressed.</p> <p><b>YNLR Comment March 4, 2023</b></p> <p>YNLR notes that Denison's understanding of the nature of the 2022 YNLR Report is incomplete. As YNLR noted many times, this report is an amalgamation of known information contained within YNLR's database. It comes from a variety of projects each with differing objectives and geographic scope. It is not a Wheeler River-specific Athabasca Denesų́łné Knowledge, Land Use, and Occupancy (ADKLUO) Study. This, in our opinion, leads to misunderstandings and misrepresentations within the draft EIS.</p> <p>Additional clarifications are that our report is not a Wheeler River-specific TLU study, nor were any such specific works undertaken or commissioned. This is important because it sets the tone for comparisons with other Indigenous groups who have met with Denison far more frequently and conducted far more intensive and focused works. Additionally, the limited engagement with did not allow for a shared Athabasca Denesų́łné – Denison in- depth exploration of Athabasca Denesų́łné experiences.</p> <p>Using the YNLR Report requires an understanding that the amalgamated information comes from a variety of projects and was collected for a variety of purposes. For example, the report mentions woodland caribou values, tracks, and sightings within the EIS study area.</p> <p>This information comes from various caribou studies and our database records project.</p> <p>information. This information clearly demonstrates that Athabasca Denesų́łné members were in the EIS area, that harvesting or other values were not recorded is a function of the purpose of the woodland caribou study rather than an indication that Athabasca Denesų́łné do not utilize the area for other traditional purposes. Other such interpretations or misrepresentations exist within the report. Additional engagement with the Athabasca Denesų́łné communities and YNLR could have ensured further clarification.</p> <p>Information from the 2022 YNLR Report Section 3.3 appears to have been disregarded in the draft EIS. This information includes references to activities mentioned during duty-to- consult works for other projects with the LSA. This includes hunting, fishing (including commercial) and the gathering of berries and medicines. The responses also indicate that the land is used for therapeutic purposes, youth gatherings, fish camps and general camping. Further the responses note that areas were utilized year-round for hunting, trapping, and fishing, with activities such as berry picking occurring in summer. Impact concerns raised by the interviewees in included damage to the lands and water, how wildlife will be affected, disruption to traditional activities and accessibility to the areas while projects are ongoing. Surely, this information is relevant to the Wheeler River project and should be included with the EIS?</p> <p>YNLR also indicated to Denison in July 2022 that some of the publicly</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #433)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>Section 11.1.2.4 of the EIS will be updated to reflect the fact that the YNLR's report is an amalgamation of known information from YNLR's database and was not collected explicitly for the purposes of the Project, and as such, should be interpreted by the reader with caution.</p> <p>Section 3.3 of the YNLR's report notes that the comments shared are not geo-located. Without having the locations disclosed, information may have been excluded from Section 11.0 as there was no way to confirm whether those activities overlapped with the spatial boundaries under consideration for potential effects to Indigenous Land and Resources Use.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>There have been no further comments from the YNLR on EIS reference no. 433. As such, Denon assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns.</p>	<p>Section 11 of the EIS has been updated to reflect the edits.</p> <p>Denison remains committed to engaging with the YNLR on these concerns.</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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		<p>available information is the draft EIS was misleading and of limited relevance to this project.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>						
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes; Other	<p><b>YNLR Comment March 4, 2023</b> Containment of the mining solution and uranium bearing solution within the mining area will be achieved through a defence-in-depth approach with three levels of containment.</p> <ul style="list-style-type: none"><li>• YNLR assumes that information and data exist with respect to the environmental safety of freeze wall technology in uranium mining operations within Saskatchewan. Has Denison reviewed these data and are they considered/presented as part of this EIS? If not, why not?</li><li>• What happens to the freeze wall and its retained contaminants at the end of the Project's life? – despite safeguards and remediation, it has potential to release contaminants after mining is completed.</li><li>• Monitoring and adaptive management are important components of sustainable uranium mining. YNLR expects to be consulted/included in the design and implementation of the Project's environmental monitoring programs.</li></ul> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> This statement is misleading because ground freezing to contain contaminants in a uranium mining extraction project has never been done in Canada before. Independent assessment comments are needed here.</p> <p>It is unclear that groundwater contaminates monitoring outside of the freeze wall is unnecessary to monitor this risk of leakage and confirm the conclusions of the predictive modeling. It is good that Denison later alludes that monitoring is necessary; however, prior comments as to the extent of YNLR involvement in planning and execution of monitoring is reiterated.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #381)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison notes this comment is on the Executive Summary and that more detailed information is available in the main part of the draft EIS e.g., Section 2 Project Description and Section 7 Geology and Groundwater (and associated appendices).</p> <p>Ground freezing technology is well established and used widely throughout the world. Its use in a mining environment was pioneered in Saskatchewan's potash mining industry for shaft sinking activities, and later adapted for use in Saskatchewan's uranium industry. Ground freezing to control and eliminate groundwater from entering mining areas is a fundamental component of two existing Athabasca Basin underground uranium mines: Cameco Corporation's McArthur River Operation and Cigar Lake Operation. Freeze walls, when fully developed, are capable of withstanding significant external pressures because the ice in the pore voids greatly improves the bulk strength of the soil. For example, in the province of Saskatchewan, ground freezing is used to support the sinking of deep potash mine shafts, which must penetrate through the Mannville formation at a depth between 400 and 500 m below surface. The Mannville formation is often described as saturated, unconsolidated beach sand and it would not support shaft excavation in a thawed state. Freezing is used to create a structural and impermeable wall up to 5 m thick, which can resist a stress gradient driven by full hydrostatic and/or lithostatic pressures on the outside of the wall, and an open to atmosphere excavation within the shaft. This loading condition is much more extreme than any condition the freeze walls at the Phoenix deposit will experience because the interior side of the freeze wall where active ISR mining is occurring is not open to atmosphere and is fluid filled in the same way that the regional groundwater system is on the exterior side of the freeze wall, creating a balanced pressure system, where loading is equal on both the interior and exterior sides.. While freeze walls are very strong when</p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p> <p>Denison respects the YNLR's desire to seek other expertise. In any event, should the YNLR wish to meet with the qualified professional utilized to design the freeze wall, Denison would be happy to facilitate.</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p>It is noted that Denison has committed to ground water monitoring; however, prior comments as to the extent of YNLR involvement in planning and execution of monitoring is reiterated. TK will have no input into ground water contamination until health risks are noted decades or centuries later. Therefore, the relevance of this statement from Denison saying that TK will inform the ground water monitoring plan is questionable.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development. YNLR appreciates the offer of Denison’s Technical expert to brief YNLR on their concerns with freeze-wall technology. Unfortunately, Denison’s freeze-wall technical expert is no more independent that Denison’s Cumulative Effects technical expert, that YNLR staff spoke to on 22 Feb 2024. Hence, YNLR’s concerns as stated in their response remains. Going forward on this item, YNLR will engage with CNSC for access to an independent technical expert on freeze-wall technology.</p> <p>Denison’s above statement is a reassertion of their comment addressed by YNLR in their letters of 02 February 2024 and 13 March 2024. Therefore, YNLR’s concerns as to their involvement in monitoring, remain valid and unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>		<p>fully developed, they are also plastic in nature. This means that they can slowly deform without failing in response to localized ground deformations. As the freeze wall deforms towards a lower stress zone, it maintains its thickness and integrity. While the above example referred to potash shafts, other examples can be drawn from the experience at the McArthur River or Cigar Lake uranium mines. At McArthur River, open stopes are generated directly adjacent to a freeze wall that is a nominal 4 m thick. At Cigar Lake, open mine cavities 10 m high and several metres in diameter commonly exist within the frozen ground. Neither site has had a breach of the freeze wall during mining activity. Given that the freeze wall at Denison will be much thicker than at McArthur River and that it will be located up to 25 m from the ore zone, it is not anticipated that it will be exposed to a stress environment that will put it at risk.</p> <p>Since the mine design includes the freeze wall as a tertiary management strategy, movement of mining solution is restricted and contained horizontally during operations. Wellfield pumping is the primary form of containment and provides the hydraulic containment to keep mining solution within the 50 m mining area (see Section 2.2.1.4.2). During the operation phase, and under normal operational conditions there is no interaction between the mining zone and surface water or down gradient groundwater environments, and the groundwater assessment (Section 7) focuses on the post-decommissioning period following removal of the freeze wall, once the groundwater flow paths return to pre-mining conditions. During mining area remediation (see Section 2.3.3.1.1), the freeze wall will remain in place until decommissioning objectives are achieved. Refinement of the mining area decommissioning objectives and associated modelling will be done through updates to the Decommissioning Plan, and will be bounded by the objectives evaluated in the EIS. To carefully evaluate how constituents dissolved in the remediated groundwater within the mining area may migrate away from and interact with the environment, a rigorous numerical model of groundwater flow and chemical constituent behaviour along the groundwater flow path was used as a predictive tool. The model is based on proven scientific principles and processes (e.g., groundwater flow, contaminant transport, and geochemical reaction processes) and allowed future conditions to be evaluated. Migration of dissolved constituent concentrations along the groundwater flow path from the mining area to Whitefish Lake (the local surface water receptor) is predicted to take hundreds to thousands of years, with concentrations remaining below values that would result in an environmental risk.</p> <p>Given the nature of the ISR mining method that will be employed by the Project groundwater monitoring is an important consideration. The groundwater monitoring plan would be developed in consideration of how Project facilities and activities could interact with the groundwater environment and groundwater users to define monitoring needs (locations, frequencies and constituents). Data generated from the groundwater monitoring plan would serve various purposes, such as to assess performance and the controls associated with the ISR process, demonstrate compliance with internal action levels, assess performance of emissions control systems, and contribute to the understanding of the potential influence of the Project on the groundwater environment. The groundwater monitoring program would demonstrate, during each Project phase, that:</p>				

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				<ul style="list-style-type: none"><li>• excursions are not occurring; if excursions do occur, an early warning/timely signal will be provided of when and where they are occurring such that appropriate further evaluation and actions can be undertaken;</li><li>• commitments made in the EA are being achieved; and</li><li>• protection of groundwater end use/receiving environment is being achieved.</li></ul> <p>The groundwater monitoring plan would be informed by existing local and traditional knowledge, ongoing engagement activities with interested parties, information generated by development of EIS and its supporting documents, relevant guidance, such as CSA Standard N288.7-15, Groundwater Protection Programs at Class I Nuclear Facilities and Uranium Mine and Mills as well as any applicable licenses, approvals, and permits.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison would be pleased to coordinate a meeting between YNLR and the technical expert Denison utilized, Greg Newman from Newman’s Geotechnique, to design the freeze wall and confirm its effectiveness for the geological and hydrogeological conditions for an ISR mine at Wheeler River. A meeting could be the most effective means for YNLR to seek information about the areas of concern with respect to the freezing technology. Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted that detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. Denison would like to clarify that the current rigorous groundwater modelling does not indicate there will be groundwater contamination nor health risks from the Project. The groundwater monitoring program will be robust and meet all regulatory standards for the type of mining proposed for the Project. Further, Denison would like to note that consideration of local and Traditional Knowledge in all facets of the Wheeler River Project will be guided by local and Traditional Knowledge Holders to the extent they wish to share information. As an example, Traditional Knowledge may or may not be relevant to groundwater monitoring results, but may have relevance to the considerations in the planning for such monitoring.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and</p>				

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				<p>development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison respects the YNLR’s desire to seek other expertise. In any event, should the YNLR wish to meet with the qualified professional utilized to design the freeze wall, Denison would be happy to facilitate. Denison has offered to involve the YNLR in groundwater monitoring plans and notes that the timeline and detail for the development of these plans extends beyond the environmental assessment process. Denison remains open to the YNLR’s involvement in groundwater monitoring plans now and in the future. Further, Denison reiterates that it will continue to consider local and Traditional Knowledge in all facets of the Project to the extent holders of such knowledge wish to share information with us.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b> During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR’s review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>				

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Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes; Other	<p><b>YNLR Comment March 4, 2023</b></p> <p>While Project water reuse is laudable, its overall conservation and management are significant concerns for YNLR, particularly the quantities removed from the ecosystem and the fate of contaminated water released back into the ecosystem from the Project that end up in Wollaston Lake. YNLR expects to be consulted/included in the design and implementation of the Project’s environmental monitoring programs.</p> <p>YNLR remains concerned with the potential effects of Project contamination on culturally important natural resources. These concerns stem from the nature of the materials being mined, and the novel method (ISR) by which they are being extracted. Northern residents and Indigenous Peoples will be living here long after the mine is exhausted, thus effective monitoring is critical, as is the inclusion of impacted Aboriginal and Treaty rights holders in the design and implementation of arm’s length, transparent, and statistically-robust monitoring programs.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>The monitoring plans are not yet drafted and therefore this is an unacceptable. response. The request is reiterated for Denison to support a collaborative approach at the concept and methodology development stage.</p> <p>"Monitoring plans when drafted" makes this an unacceptable response to the YNLR concern, this does not go beyond the statement in the EIS and therefore the further response here continues to be unacceptable; prior comments as to the extent of YNLR involvement in planning and execution of monitoring is reiterated.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #383)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>The specific activity of water withdrawal from Whitefish Lake was assessed in the draft EIS, Section 8.1. The conservative estimate of water withdrawal would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm; this minor change is beyond the ability of monitoring techniques to practically measure, and the assessment concluded that the Project would not result in a significant effect on surface water quantity (hydrology). It is noted that there will be a separate permitting process that will consider water withdrawal for Project support that will occur following the EIS. Monitoring, including of water withdrawal rates and of potential effects (e.g., change in water flow, change in lake levels) will be implemented as the Project moves forward.</p> <p>Denison is committed to sharing information with Indigenous Communities of Interest (COIs) in a mutually agreed-upon fashion. Overall, the approach that will be utilized with respect to Indigenous community engagement will be aligned with Denison’s Indigenous Peoples Policy. Denison’s Indigenous Peoples Policy commits the company to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land. The relevant monitoring plans for the species/resources that support a traditional diet will reflect and incorporate these values and will be reflective of the Indigenous COIs priorities. The monitoring plans when drafted will include more detail about communication methods and their effectiveness would be assessed through ongoing engagement with Indigenous communities.</p> <p>As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible.</p> <p>Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesųliné communities’ relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųliné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųliné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. YNRL will be informed throughout the monitoring program design and implementation process.</p> <p>A list of commitments, including specific commitment or mitigation measures related to Project effects as an outcome of engagement, made in the draft EIS, throughout the Federal information request period and the Provincial comment response period, will be included with the submission of the final EIS. For clarity, this would not include any private, confidential accommodations made under contractual agreements.</p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	Based on Denison’s understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR’s interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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				<p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with</p>				



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				the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.				
Ya'thi Néné Lands and Resources Office	Current use of lands and resources for traditional purposes; Other	<p><b>YNLR Comment March 4, 2023</b></p> <p>It is noted that the aquatic survey and fish sampling were carried out in 2016, which is now somewhat dated. It is also noted that work that would affect fish and fish habitat could/should only be carried out between July 16 and September 30th, as both spring and fall spawning species were collected in the fish sample. YNLR acknowledges that the amount of fish habitat directly affected by the Project is small. However, a much bigger concern is the indirect effects of increased human activity in the area over several decades and beyond, particularly with respect to the consequent increase in fish harvest. This will directly affect the ability of Indigenous Peoples to exercise their Aboriginal and Treaty rights. Related comments:</p> <ul style="list-style-type: none"><li>• YNLR would be eager to see how “a fish salvage plan to relocate fish prior to in-water works” might be carried out? Such an approach may not be practicable or effective.</li><li>• While the sentiment of the above fish management strategy is laudable, it is not practical in terms of preserving fish numbers given the increased human access to the lakes that the mining activity will create.</li><li>• The EIS does recognize the value of sucker species to residents, which is a positive step, as these fish species are netted for a variety of purposes. Increased local traffic will also undoubtedly provide more access for both subsistence and recreational fishing. As part of the mitigation measures YNLR proposes working with authorities to regulate recreational fishing prior to the onset of the construction phase of the Project and revisiting these regulations at intervals throughout the mine’s operation and decommissioning.</li><li>• YNLR disagrees with the assumptions used (Section 8.3.7.2 to 8.3.7.5), which “assume” specific monitoring and follow-up for Fish and Fish Habitat related to cumulative effects is not warranted.</li><li>• YNLR would like to be involved in designing and carrying out of a monitoring program, which would test the “no cumulative effect” assumption.</li><li>• YNLR would like to be involved in a monitoring program for fish health. Further, this monitoring program should continue for the life of the Project or until it is demonstrated that the current filtering programs are effective.</li></ul> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>YNLR looks forward to the details on how this collaboration will be conducted.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on</b></p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #397)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>The response to the review comment are organized by theme, consistent with the comment.</p> <p>Fish salvage: Details of a fish salvage program, if required, will be developed to support Project permitting and licensing. Briefly, for any in-water work, the work area would be isolated from rest of the waterbody. Any fish remaining inside the isolated work area would be captured and relocated outside of the work area. Based on the experience of Denison and its SME team it is noted that such programs are implemented successfully on a routine basis with effective and site-specific planning.</p> <p>Indirect effects related to increased human activity in the area: Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles and will largely be "confined" to the camp and work areas during their shifts. Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders.</p> <p>Recreational fishing: As described in the draft EIS and as noted above, workforce members will be transported to/from site via a fly-in/fly-out rotation and will, therefore, not use ground travel options during shift changes, which will eliminate fishing on local lakes during commutes to/from the site and during time off work. Denison site vehicles will not be available for recreational purposes. While at the Project site and off duty, workers may opt to fish local waterbodies. To protect sustainable use of resources, only catch and release of fish will be encouraged, and fish storage or cooking facilities will not be provided. To prevent entry of land users from entering the Project Area, Denison will control access to the property with both a north and south security gate. Overall, given a lack of resources to access fishing locations and store fish harvests, workforce fishing is expected to cause minimal disturbances to local users.</p> <p>Monitoring: In the draft EIS, Denison outlines its plans to conduct fish health monitoring in tandem with surface water quality, sediment quality, benthic invertebrate and fish and fish habitat sampling. Sampling locations will be co-located to facilitate comparison to water quality and sediment quality characteristics. Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion.</p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p><b>April 05, 2024)</b> While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.</p> <p><b>Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>		<p>YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries are sufficiently extensive to measure EIS predictions. Denison is committed to maintaining positive relations with all local interested parties and will be open to discussions on any issues or concerns that arise.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those</p>				

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Ya’t’hi Néné Lands and Resources Office	Health and socio-economic conditions	Interest in procurement and employment and training.	ROC 570	<p>Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan’s North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.</p>	<p>Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan’s North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.</p>	Based on Denison’s understanding of the comment, the comment made has a relationship to similar-type public comments made by YNLR on the draft EIS. Denison has responded to the YNLR on all draft EIS public comments, by providing background information, clarification on assumptions and approach	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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						taken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.		
Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions	<p><b>YNLR Comment March 4, 2023</b> Based on the information from p. 2 of the Project Overview: YNLR assumes no permanent work camp will be constructed YNLR expects that a sizeable proportion of the Project workers will be hired from the local and regional area.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirms that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #376)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan, inclusive of YNLR) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. YNLR businesses would fall in the category of northern Saskatchewan businesses, which would place them in line for second preference if project needs cannot be met within the local study area.</p> <p>Details on the Project components are provided in EIS Section 2. The Project will be operated as a fly-in/fly-out mine, meaning the opportunities for interactions between the workforce and Indigenous communities are limited as workers will be transported by air directly to the site. The proposed camp or accommodations facility is anticipated to be a turnkey building manufactured off site and assembled and commissioned on site. The building's design will be sized to accommodate a peak load of about 190 individuals during Operation; however, due to its modularized design, additional modules can be easily installed should additional beds be required in the future.</p> <p>Section 13 provides the assessment for the key indicator of employment and training, which is a component of the Economy Valued Component. A summary of residual environmental effects on employment and training is found in Table 13.5-2. Employment opportunities represent direct and indirect benefits associated with construction and operation of projects, particularly in the vicinity of communities where unemployment is typically high.</p>	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items).	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justificati on of Status	Ongoing Resolution of Concerns (if required)
				<p>Additionally, because the property is located on Crown Land, a mineral surface lease agreement will be negotiated with the Province, specifically the Ministries of Environment and Government Relations. The agreement grants surface rights for the purpose of accessing the land to extract minerals under the Crown Resources Land Regulations. The mineral surface lease agreement provides long term rental of Crown land for mining and milling in Saskatchewan. The agreement also contain specific commitments for environmental protections for the life of the project, OH&amp;S protocols, reporting requirements, and socio-economic benefits for residents of northern Saskatchewan.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 376. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>				
Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	<p><b>YNLR Comment March 4, 2023</b> YNLR is concerned with the potential increase in road and off- road traffic affecting wildlife and fisheries sustainability.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #377)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles and will largely be "confined" to the camp and work areas during their shifts. Refer to draft EIS, Section 12 Quality of Life for the assessment of potential Project effects on the Key Indicator of Infrastructure and services (traffic) and the associated measurable parameter of change in traffic volumes and types and risk of accident.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.



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				There have been no further comments from the YNLR on EIS reference no. 377. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p><b>YNLR Comment March 4, 2023</b> YNLR would like to emphasize that natural resource use by Indigenous Peoples of northern Saskatchewan is of incalculable value, and the Project must not infringe upon the ability of Indigenous Peoples to exercise those constitutionally protected rights.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #416)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison acknowledges the comment. We believe that the work we have done to date with the YNLR, such as entering into an Exploration Agreement in respect of Denison's exploration activities, demonstrates our strong understanding of this YNLR emphasis.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 416. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.
Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for	<p><b>YNLR Comment March 4, 2023</b> The EIS notes that "The presence of the Project workforce will increase the numbers of people in the ILRU LSA by an estimated 300 during Construction and 180 during Operation and Decommissioning." YNLR notes that: • This is a significant increase in the number and persistence of</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Section 12.3.3.2.1 of the EIS describes how access north of the Key Lake gatehouse for employees of northern mines, Indigenous resource harvesters from select communities, cabin owners, and lease owners provides for controlled access to users. Further, Denison staff will not be allowed to hunt or fish. Denison expects to continue to work with Indigenous COI to share information about the	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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	traditional purposes;	<p>humans in the area, and despite these vague reassurances, YNLR believes that this increase will affect the ability of Indigenous Peoples to exercise their Aboriginal and Treaty rights and increase the pressures on the natural resources of the area.</p> <ul style="list-style-type: none"><li>• YNLR believes that Denison provides an overly optimistic conclusion regarding the impacts of the Project on traditional resource use by Indigenous peoples.</li><li>• One indicator of increased human activity is truck traffic. However, these numbers do not include non-truck traffic. How will Denison address this?</li></ul> <p>As with the impacts on the traditional use of land and natural resources by Aboriginal and Treaty rights holders, the human presence in the region is going to increase, which in turn will put additional pressures on fish and wildlife resources.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	Comment #417)	<p>proposed impacts of the Project in relation to the potential to adversely impact the exercise of hunting, fishing, trapping and the carrying out of traditional uses as a result of the Project. Information in this respect will be provided as an update to the EIS. Further mitigations identified in Section 12 include:</p> <ul style="list-style-type: none"><li>• Air transportation will be used to transport most workers between the Project site and designated pick-up and drop-off points in communities. Pick-up points will be located at two locally central points in communities within the LSA, one additional site in northern Saskatchewan, and potentially other locations to minimize time spent away from families.</li><li>• Denison's Environment, Health, Safety, and Sustainability Policy will be enforced.</li><li>• Liaison with LSA communities and relevant authorities (e.g., RCMP, health and service providers) will continue.</li><li>• Culturally sensitive employment policies that support the Indigenous workforce will be implemented (e.g., having an Elder representative at the Project site to provide cultural programming)</li></ul> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 417. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>		background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.		
Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p><b>YNLR Comment March 4, 2023</b> The EIS Executive Summary outlines mitigation measures, monitoring requirements, and commitments needed for Denison to have confidence that Project is operating as planned and that the actual effects resulting from Project Construction, Operation, and Decommissioning are at or below predicted effects. Despite these reassuring statements, YNLR is aware that predictions may fall short, hence the need for close collaboration with Indigenous Peoples, communities, and organizations, including their input into the design and implementation of transparent and statistically-robust project monitoring programs.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #379)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison acknowledges the comment and is committed to ongoing engagement and dialogue with interested parties with respect to monitoring. Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p>	<p>Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as</p>	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p>Denison states that they will inform YNLR of the development of their monitoring plan. This does not meet the YNLR request for input and collaboration into the design of monitoring programs.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.</p>		<p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licensing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps.</p> <p>Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.”</p> <p>Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward.</p> <p>It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with</p>	developed through the permitting and licensing process, for input and collaboration as the Project advances.	undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR’s interests. Denison remains committed to engaging with the YNLR to come to resolution.		

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				the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.				
Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p><b>YNLR Comment March 4, 2023</b></p> <p>Fish, fish habitat, and fish health are all extremely important to northern people of Saskatchewan, and especially Indigenous People. Wild fish are a culturally important source of protein and provide economic opportunities in the form of commercial fishing and recreational angling.</p> <ul style="list-style-type: none"><li>• YNLR will be eager to and expects to be involved in collaborating with Denison in the future monitoring of these vital natural resources.</li><li>• Based on existing federal fishers legal and policy requirements, YNLR expects that all fish habitat destroyed or altered by the Project will be more than offset.</li></ul> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>There is no monitoring plan developed yet to substantiate Denison's determination here. YNLR continues to state its desire for collaboration in the development of monitoring analysis and assessment plans.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #386)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. Denison expects that important country foods harvested for food and cultural purposes (e.g., moose, fish, etc.), surface water quality, and other areas of interest will form parts of these monitoring programs, including other areas of potential concern as they evolve over time. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p> <p>The specific potential for need for approval(s) under the Fisheries Act related to effects on fish and fish habitat (i.e., harmful alteration, disruption and destruction) resulting from Project activities has been assessed and presented in the draft EIS. Based on the assessment, Denison has determined that effects can be avoided and mitigated and therefore there will be no need for fish habitat offsets under the Fisheries Act.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licensing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps.</p> <p>Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level</p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licensing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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				<p>information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b> During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR’s review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>				
Ya’thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p><b>YNLR Comment March 4, 2023</b> YNLR places a high priority on wildlife and wildlife habitat, from both ecological and sociocultural perspectives. Given the long-time frame of the Project, YNLR are concerned about the lack of significance associated with the residual and cumulative effects assessments of all ecological VCs. YNLR believes that the addition of this mine with its associated disturbances will have a cumulative effect on wildlife, especially for woodland caribou, as the area is already crisscrossed with many kilometres of seismic cut lines through the LSA, RSA and beyond (Figure 9.2-6, page 9-83, EIS and Appendix 9B). YNLR maintains that in order for the Project to meaningfully attempt to mitigate this concern, the company must work with Indigenous partners to create an effective habitat offset plan for this species. This should form part of any project approval. Such a plan should, for</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #387, #401 to #411)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment.</p> <p>It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The</p>	Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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		<p>instance, include steps to restore the considerable caribou habitat degraded by past mineral exploration activities.</p> <p>Additional YNLR concerns on this matter include:</p> <ul style="list-style-type: none"><li>- YNLR is concerned about the potential residual and cumulative effects of the extensive seismic network on the soils of the RSA and LSA. Were these and other potential network effects considered in the analyses?</li><li>- Appendix 9B of the EIS states that 100% of the LSA and 82% of the RSA are already disturbed by buffered anthropogenic disturbances in the form of exploration lines, exploration trails, and seasonal roads. During the consultation process, residents raised the issue of the high degree of human disturbance and highlighted concerns about the broad network of linear disruptions in numerous places across the EIS. As with the Project soils, YNLR is concerned about the potential residual and cumulative effects of the extensive seismic network on the vegetation and wetlands of the RSA and LSA, particularly from edge effects. Were these and other possible effects of the network considered? If so, how were they included?</li><li>- Wilson et al. (2018) recently summarized the home ranges of 25 woodland caribou populations in Canada. The average home range varied 28-fold, from 312 to 8,838 sq. km. The RSA delineated for assessing cumulative effects on caribou (40,174 ha ~ 402 sq.km.) is thus inadequate for this purpose, and the conclusions of project residual and cumulative effects non-significance are highly suspect. The same could be said for other wide-ranging species such as wolverine.</li><li>- Was the current RSA anthropogenic disturbance estimate (599 ha) inclusive of the many kilometres of existing seismic cut lines? Did the estimate include consideration of the compounding ‘edge effects’ from these linear disturbances? If not, why not? See previous comments on the very high level of existing human disturbance in the LSA and RSA highlighted in Appendix 9B.</li><li>- Again, the direct and indirect effects of the existing seismic disturbance seem not to have been considered in this assessment, particularly because wolverines ‘avoid linear infrastructure.’ In fact, one can also see that woodland caribou avoid areas of historic seismic disturbance by directly comparing the figures on page 9-139, EIS (vegetation) and 9-202, EIS (caribou sightings). Appendix 9B gives a summary of the impacts of linear disturbances on boreal forest wildlife.</li><li>- Buffered disturbance is included in Appendix 9B but appears to have been ignored in the effects assessment. Was the 500m buffering of anthropogenic disturbances also applied to the network of seismic cut lines to account for edge effects? If not, why not?</li><li>- Is the amount of initial ‘available woodland caribou habitat’ inclusive of the direct and indirect seismic cutline network effects? If not, why not? Irrespective of this, it appears that the LSA is being written off for woodland caribou for decades to come. See above</li></ul>		<p>details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>Denison will continue to engage with YNLR on topics of interest.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>Public comment #387: YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project’s detailed decommissioning plan. Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison’s previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are</p>	<p>Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	responses from regulators		

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		<p>comments with respect to Appendix 9B.</p> <ul style="list-style-type: none"><li>- The EIS correctly highlights the cultural importance of moose and woodland caribou to Indigenous People, which underscores YNLR's concerns regarding the conclusions of the residual and cumulative effects assessments of these species, particularly for caribou. YNLR questions the optimistic conclusions drawn by Denison regarding the ongoing availability of woodland caribou for traditional use.</li><li>- Past and future direct and indirect effects of seismic line clearing appear to have been ignored in this assessment (Appendix 9B). The fact that most caribou sightings occurred away from seismically disturbed areas independent of habitat type supports this observation. YNLR disagrees with this overall residual effects conclusion for these wildlife VCs, especially in regard to woodland caribou (Appendix 9B)</li><li>- YNLR strongly believes that, at a minimum, an aggressive Caribou Habitat Offset Plan should be co-developed before Project work begins, and regular monitoring of the caribou population be conducted throughout the life of the Project.</li></ul> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> Public comment #387: The consideration of offsets in the decommissioning plan is not appropriate as a substitute for considerations of offsets in a present-day mitigation plan. Offsets are a method to address current habitat damage from the impacts of development while mitigation is underway. Offsets augment habitat requirements now and into the future. Consideration of offsets in a decommissioning plan is primarily for the damage that could not be mitigated in a preceding mitigation and management plan. YNLR reiterates its stated desire to collaborate, now, with Denison in the development of all plans for monitoring and mitigation. Notification to YNLR by Denison for plans and processes after their development is complete is not acceptable. Restoration of the area to pre disturbance conditions could be considered as an 'offset'. As long the DDP is done well in advance, it doesn't matter. However, the discussion for offsets should really be considered during the life of the mine, not afterwards.</p> <p>No further response provided by YNLR for public comment #401 to #411</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> Public comment #387: While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a</p>		<p>conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses. Public comment #401 to 411: There have been no further comments from the YNLR on EIS reference no. 401 to 411. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b> During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR's review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>				



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		<p>conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.</p> <p>YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed.</p> <p>YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR’s interest in the details of Denison’s caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR’s GIS based Method for Assessing Cumulative Environmental Effects).</p> <p>Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.</p> <p>Public comment #401 to #411: YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>						

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Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p><b>YNLR Comment March 4, 2023</b> YNLR expects to be included as part of the design and implementation of all monitoring programs. All such programs should be transparent, arm's length, include significant involvement and participation of Indigenous People, communities, and organizations and be statistically robust. While appreciating current water quality standards, YNLR suggests that monitoring programs be designed to more than meet regulatory requirements of the license conditions. The EIS recognizes that the Project area lies primarily within an undisturbed area of the boreal forest (aside from the extent of seismic activity carried out within this area). YNLR would like to be involved in specific follow-up and monitoring plans as identified in the EIS.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> See comments above on YNLR collaboration in the development and implementation of monitoring plans. YNLR needs a general statement concerning requested collaboration in management and monitoring plans.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #390, #396)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. Denison expects that important country foods harvested for food and cultural purposes (e.g., moose, fish, etc.), surface water quality, and other areas of interest will form parts of these monitoring programs, including other areas of potential concern as they evolve over time. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p> <p>As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." The monitoring and follow-up program will include measurement of water quality parameters to meet regulatory criteria (i.e., provincial discharge permits, Metal and Diamond Mining Effluent Regulations [MDMER; Government of Canada 2022] and CSA N288.4-19 (CSA Group 2019). At a minimum, this will include collection of non-radiological parameters (e.g., metals, nutrients, hardness, temperature, pH, TDS, TSS, and sulphate) and radiological parameters. Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions. Additionally, regulators will be involved with setting specific requirements for follow-up and monitoring, as well as reporting, through licence conditions (CNSC) and provincial approvals. A number of monitoring and reporting requirements will be generated through the completion of the environmental assessment process. Denison and its lifecycle regulators will be in regular communication throughout the life of the Project as part of routine reporting, site inspections, licence and permit renewals. Denison is committed to ongoing engagement with regulators and recognizes that this will include information sharing related to follow-up and monitoring results and any needed adaptive management plans. It is also noted for further reference that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (<a href="https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-">https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-</a></p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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				<p>facilities/iemp/index.cfm), and the Eastern Athabasca Regional Monitoring Program (<a href="http://www.earmp.ca/">www.earmp.ca/</a>). Results from these programs provide relevant information and can complement Denison’s Project-specific monitoring program. One forum for discussion of monitoring results is the Northern Saskatchewan Environmental Quality Committee (<a href="https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-Saskatchewan-environmental-quality-committee">https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-Saskatchewan-environmental-quality-committee</a>).</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful</p>				

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				<p>process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b> During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR’s review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>				
Ya’thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p><b>YNLR Comment March 4, 2023</b> The Project is located within Nuhenéné and of principal concern to YNLR is that the Project be fully sustainable with respect to cultural rights and traditions, socioeconomic equity, and environmental protection. To achieve this end, YNLR expects Denison to work collaboratively with the people of Nuhenéné through the YNLR office. YNLR supports the sustainable mining of uranium within Nuhenéné.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #392)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison notes YNLR's perspective on this. In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the Nuhenéné through the YNLR office in a mutually agreed upon manner and will continue to do so.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 392. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.

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Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	<p><b>YNLR Comment March 4, 2023</b></p> <p>YNLR believes there is a lot of uncertainty remaining from this EIS. This stems from several items, including the relatively novel nature of the ISR methodology with its potential effects on water quality and fish health, to the questionable conclusion that the mine will be neutral with respect to the persistence of woodland caribou in the region.</p> <p>If the mine is to be approved, YNLR wants a transparent, independent, statistically robust monitoring program implemented for the life of the Project and beyond. YNLR expects northern Indigenous Peoples to be involved in the design and implementation of such a program.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR confirmed that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #420)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries are sufficiently extensive to measure EIS predictions. Additionally, Denison has identified key objectives respecting Indigenous engagement associated with the Project:</p> <ul style="list-style-type: none"><li>• Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency.</li><li>• Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion.</li><li>• Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects.</li></ul> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>There have been no further comments from the YNLR on EIS reference no. 420. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Health and socio-economic conditions; Physical and cultural heritage; Current use of	<p><b>YNLR Comment March 4, 2023</b></p> <p>YNLR remains concerned about the nature and disposition of project contaminants during and after the mining process.</p> <ul style="list-style-type: none"><li>• YNLR supports the Project outcome of lower aboveground disturbance, it retains concerns about the management inputs and outputs of the ISR method, particularly project water sources, quantity, and release along with its associated contaminants.</li><li>• The release of contaminants before and after the Project's</li></ul>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>Denison acknowledges the comment and concerns raised by YNLR. Denison believes the assessment of potential effects, such as those highlighted in the review comment, have been considered in a robust manner in the EIS and appropriate mitigations have been proposed. Denison is committed to ongoing engagement and dialogue with interested parties on key Project aspects such as that referenced in the review comment.</p>	Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. Details of monitoring will be developed prior to, and applicable for each phase of the Project,	Denison understands that YNLR expects to inform Denison that this concern has been	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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	lands and resources for traditional purposes;	<p>completion worries YNLR, which sets a high priority on clean and abundant groundwater and surface water. The Indigenous People, communities, and organizations YNLR represents will be here long after mine decommissioning, so minimizing this risk with statements regarding the length of time it takes is not helpful.</p> <ul style="list-style-type: none"><li>As with groundwater, YNLR places a high value on the quantity and quality of surface waters. Monitoring of water will be critical, and YNLR expects to be consulted and heavily involved with respect to this activity.</li></ul> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No timeline for consultation has been offered. The response simply restates Denison's original comments in the EIS. Denison promises dialogue. YNLR wants to see the predecommissioning monitoring plan for contaminant releases so that mitigation can be applied long before decommissioning. YNLR wants to be involved with all monitoring plans and programs from conception to implementation.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.</p> <p>YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed.</p> <p>YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis.</p>	Comment #380)	<p>With specific reference to site decommissioning the following is noted. Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p>YNLR has shared comments with respect to Woodland Caribou offsets, including those related to the definition of offsets, timing, and mitigation measures as part of present-day mitigation measures for the Project, and should be applied in advance of decommissioning. YNLR has also requested to see the predecommissioning monitoring plan for containment releases. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided a document titled Summary of Monitoring, which outlines the Project's commitments for monitoring programs for all phases of the Project from preconstruction to post decommissioning. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR</p>	<p>including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	addressed in the near future, pending review of the monitoring plans and responses from regulators.		



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		<p>Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR’s interest in the details of Denison’s caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR’s GIS based Method for Assessing Cumulative Environmental Effects).</p> <p>Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>		<p>interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project’s detailed decommissioning plan. Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison’s previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter. Denison response April 2, 2025</p> <p><b>(Response to YNLR Comment December 17, 2024)</b></p>				

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				Denison noted the development of the monitoring plans is progressing and that YNLR’s review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.				
Ya’thi Néné Lands and Resources Office	Health and socio-economic conditions; Physical and cultural heritage; Current use of lands and resources for traditional purposes;	<p><b>YNLR Comment March 4, 2023</b></p> <p>YNLR supports Denison’s corporate Indigenous Peoples Policy (IPP) and looks forward to collaborating with Denison to ensure that the Project’s socioeconomic benefits reach local Indigenous People. YNLR acknowledges that Denison incorporated the YNLR report into the EIS and looks forward to further working with the company collaboratively regarding the rights of Indigenous People. YNLR is interested in an impact benefit agreement with Denison ensuring mutual benefits from the Project and co-management of environmental monitoring and mitigation. The EIS minimizes effects of Lands and Waters availability and access on northern residents and Indigenous Peoples. Any impairment to the ability of Indigenous Peoples to utilize their Aboriginal and Treaty rights to the use of natural resources for their traditional activities constitutes an infringement of those constitutionally protected rights and must be justified. Rigorous examination of these impacts and negotiated compensation for these impacts should therefore be seriously considered.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>"YNRL will be informed throughout the monitoring program design and implementation process." Once again this is an unacceptable delay and does not go beyond the original statements in the EIS. Prior comments made, as to the extent of YNLR collaborative involvement, in planning and execution of monitoring is reiterated.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #384)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects, wherever possible. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesų́líné communities’ relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesų́líné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesų́líné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. YNRL will be informed throughout the monitoring program design and implementation process. A list of commitments, including specific commitment or mitigation measures related to Project effects as an outcome of engagement, made in the draft EIS, throughout the Federal information request period and the Provincial comment response period, will be included with the submission of the final EIS. For clarity, this would not include any private, confidential accommodations made under contractual agreements.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when</p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>		<p>experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b></p> <p>Denison noted the development of the monitoring plans is progressing and that YNLR’s review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>				
Ya’thi Néné Lands and Resources Office	Health and socio-economic conditions; Physical and cultural heritage;	<p><b>YNLR Comment March 4, 2023</b></p> <p>There are about three dozen Valued Component/Key Indicators that are assessed for the significance of cumulative effects (effects that remain after mitigation) from the Project. These include air quality, noise, terrain morphology and stability, groundwater quantity and quality, surface water quality and quantity, soil quantity and quality, organic matter, sediment quality, benthic invertebrates, fish and fish</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>Please refer to the response to YNRL comments #418. Additionally, Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response, the Wheeler River Project Environmental Impact</p>	Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies.	Based on Denison’s understanding of the concern or comment, Denison has provided	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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	Current use of lands and resources for traditional purposes; Other	<p>habitat, fish health, vegetation abundance, listed plant species, wetlands, moose, furbearers, woodland caribou, raptors, migratory breeding birds, avian species at risk, human health, Indigenous land and resource use, other land and resource use, heritage resources, traditional diet, income of workers, community cohesion, traffic, community infrastructure and services, and economics.</p> <p>As with the summary of the residual effects, the cumulative effects of the Project on all of these VCs/Kis are concluded to be non-significant in the EIS.</p> <p>Again, YNLR believes this to be an overly optimistic and statistically unlikely prediction for the same reasons as given above, for example, inadequate spatial boundaries, poorly chosen and grouped VCs and Kis, the apparent omission of the existing linear disturbance network in the effects assessments, and the largely qualitative nature of the assessments and their resultant ‘significance.’</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	Comment #419)	<p>Statement - Denison’s Response to Woodland Caribou Habitat Comments.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 419. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR on these concerns.	background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR’s interests. Denison remains committed to engaging with the YNLR to come to resolution.		
Ya'thi Néné Lands and Resources Office	Other	<p>A question was asked if Denison was aware of the Collaboration Agreement with Orano and Cameco, and whether the Project would be a part of that.</p>	ROC 570	<p>Denison will negotiate with the Province of Saskatchewan to develop the Project’s Surface Lease Agreement and the Human Resource Development Agreement, which will outline measures in relation to socio-economic parameters related to the Project.</p>	<p>Denison will negotiate with the Province of Saskatchewan to develop the Project’s Surface Lease Agreement and the Human Resource Development Agreement, which will outline measures in relation to socio-economic parameters related to the Project.</p>	Based on Denison’s understanding of the comment, the comment made has a relationship to similar-type public comments made by YNLR on the draft EIS. Denison has responded to the YNLR on all draft EIS public comments, by providing background information,	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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						clarification on assumptions and approach taken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR’s interests. Denison remains committed to engaging with the YNLR to come to resolution.		
Ya’thi Néné Lands and Resources Office	Other	Interest in information regarding radiation scanning.	ROC 77	As stated in Section 2.9.1.3.2, A Radiation Protection Program would be designed and implemented so that Denison complies with, or exceeds, the level of radiation safety that is required by the relevant regulations pursuant to the Nuclear Safety and Control Act and Denison’s Health and Safety Policy. Activities within the program would include implementing a radiation code of practice, measuring and monitoring radiation on an ongoing basis, and reporting radiation testing results to regulators. As summarized in the Worker Health assessment (Section 10.2.3.2.10) potential residual effects to worker health during Construction and Operation are expected to be negligible given that the predicted radiation doses are less than the annual allowable effective dose of 20 mSv/yr, and radon is predicted to be within the range that is manageable under an RPP.	N/A	Based on Denison’s understanding of the comment, the comment made has a relationship to similar-type public comments made by YNLR on the draft EIS. Denison has responded to the YNLR on all draft EIS public comments, by providing background information, clarification on assumptions and approach taken, and has outlined a proposed approach forward to the	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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						YNLR to reflect the YNLR’s interests. Denison remains committed to engaging with the YNLR to come to resolution.		
Ya’thi Néné Lands and Resources Office	Other	Questions were asked about ISR mining and on what would take place on site, and whether processing would occur at McClean.	ROC 77 ROC 83 ROC 457 ROC 570	<p>Project components include: ISR, Drilling, Freeze Wall, Wellfield, Processing, Water Management, Waste Management, Access and Transportation, Power, Support Facilities, Project Area, Project Activities, Ancillary Projects, GHG Emissions, Project Schedule, Project Benefits, Project Design Features, Management System, and Project Alternatives. See Section 2 for information and technical detail pertaining to Project Components and Project alternatives.</p> <p>Engagement activities for the Project can and will evolve over time, as information is gathered that is pertinent to Denison’s understanding of the Interested Parties and their relationship to, and interest in, the Project. At present, Denison has an Exploration Agreement with KML and continues to engage with KML and NVP with respect to the Wheeler River Project.</p> <p>See Section 4 for additional information on the consultation process.</p>	N/A	Based on Denison’s understanding of the comment, the comment made has a relationship to similar-type public comments made by YNLR on the draft EIS. Denison has responded to the YNLR on all draft EIS public comments, by providing background information, clarification on assumptions and approach taken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR’s interests. Denison remains committed to engaging with the YNLR to	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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						come to resolution.		
Ya'thi Néné Lands and Resources Office	Other	Interest in sharing IK and history and integration of this information in the EIS, including Traditional Land Use information.	ROC 78 ROC 83	Section 3 provides information on IK and LK and how this information was integrated throughout the EIS. Indigenous Knowledge has been integrated throughout the EIS and a section on the Influence of Indigenous Knowledge, Local Knowledge, and Engagement is provided in the methodology for sections. For example see Section 11.1.2 and Section 11.2.2 for further details on how Indigenous Knowledge, Local Knowledge, and Engagement influences Land and Resource Use.	N/A	Based on Denison's understanding of the comment, the comment made has a relationship to similar-type public comments made by YNLR on the draft EIS. Denison has responded to the YNLR on all draft EIS public comments, by providing background information, clarification on assumptions and approach taken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> YNLR sees a potential benefit of the in-situ approach as it is designed to reduce the surface disturbance of the Project, and the potential leakage of contaminants from excavated rock and tailings. However: <ul style="list-style-type: none"><li>• YNLR is concerned that the extraction of source water for the Project may have a negative effect on stream flows both below- and</li></ul>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison acknowledges these concerns and notes the comment from YNLR references the Executive Summary. Both of the areas of interest raised by the comment are addressed in the main part of the draft EIS and supporting appendices. Denison refers YNLR to the following sections for comprehensive	Follow-up and monitoring programs will be employed to confirm mitigation measures are functioning as planned and to confirm EA predictions.	Based on Denison's understanding of the concern or comment, Denison has	As per Denison letter to YNLR dated	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p>aboveground.</p> <ul style="list-style-type: none"><li>• YNLR is concerned with the potential effects of contaminants released during and after the Project.</li></ul> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	(Public Comment #375)	<p>evaluation of these aspects of the Project:</p> <ul style="list-style-type: none"><li>• Potential changes in surface water quantity as the result of the Project, including consideration of water taking activities, are presented in the hydrology assessment (draft EIS, Section 8.1).</li><li>• Potential changes to groundwater quantity and quality as the result of the Project, including consideration of the long-term implications of the mining method, are presented in the groundwater assessment (draft EIS, Section 7). Specifically, the 'future centuries' temporal scope of the assessment for Groundwater considers the period for which the highest COPC concentrations in groundwater are predicted to interact with surface water based on groundwater modeling described in Appendix 7-C. Due to the relatively long travel time (relatively low groundwater velocities) between the mining area (Section 7.6.2.2.3) and the surface water environment where groundwater/surface water interactions are expected, as well as the potential for chemical reactions along the groundwater flow pathway, a 'future centuries' scenario was deemed appropriate to fully assess potential future effects beyond the Project timeline (i.e., 0 to 38 years). The 'future centuries' temporal scope was also developed in recognition of the concerns raised by Interested Parties through the engagement process around the potential for the Project to influence water quality into the future.</li></ul> <p>These assessments, completed in a transparent and rigorous manner, concluded that residual effects of the Project would not be significant. Follow-up and monitoring programs will be employed to confirm mitigation measures are functioning as planned and to confirm EA predictions. For example, a groundwater monitoring plan, including an excursion contingency plan and measures for adaptive management will be implemented for the Project.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 375. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR on these concerns.	provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	June 28, 2024	
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> Will the released radon gas be of any concern to natural resources, such as fish and wildlife?</p>	YNLR Public Comments (March 4, 2023, March	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Inhalation pathway to terrestrial wildlife and birds was included in the Ecological Risk Assessment (EcoRA). Please refer to the draft EIS Appendix 10-A Section 5</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison	Denison remains committed to engaging with the YNLR.

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		<p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>	13, 2024, and June 19, 2024) (Public Comment #382)	<p>and an excerpt is provided below for reference: Exposure pathways consider the various routes by which radionuclides and/or chemicals may enter the body of the receptor, or for radionuclides, may exert effects from outside the body. Exposures to environmental media may be direct (i.e., by contact) or indirect (i.e., via constituent transport through the food chain). For each type of ecological receptor, draft EIS Appendix 10-A Table 5-5 summarizes the relevant exposure pathways to various environmental media including air, surface water, soil, and sediment. Airborne COPCs partition to soil and plants. For most COPCs, ingestion pathways dominate over inhalation and air immersion. The latter pathways are considered minor pathways in the EcoRA, but inhalation was included in the IMPACT model and is thus included in draft EIS Appendix 10-A Table 5-5.</p> <p>Exposure to constituents that may deposit from air to surface water was not considered, as that pathway is considered negligible according to CSA N288.1-20. As such, a pathway of radon in air to aquatic receptors such as fish was not evaluated. Radiological dose to aquatic receptors is evaluated through water and sediment exposure, as appropriate based on the receptor's characteristics. For fish, aquatic plants, and aquatic invertebrates, contact with water and constituent uptake from water via bioaccumulation represents the main exposure pathway. Direct contact or uptake from sediment are also considered for benthic invertebrates and bottom-feeding fish.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 382. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR.</p>			dated December 17, 2024	
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> Indigenous People have brought forward concerns with the extensive network of seismic cut lines at several places in the EIS.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> YNLR has not been privy to any caribou mitigation and offset discussions to date and would like to be as soon as possible. Consideration of offsets in a site decommissioning plan must be based on the results and analysis of an ongoing mitigation/offset plan that is in-place and functioning from the point of inception. Further</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #388)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment.</p> <p>It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets".</p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.</p> <p>Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p>to this, the ongoing results of the in-place mitigation/offset plan are obtained for analysis from an active and comprehensive monitoring plan that is also in place from the point of inception. Both of these issues reinforce the YNLR position that they need to be involved in the collaborative development and implementation of monitoring and other plans.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development. YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed.</p> <p>YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR’s interest in the details of Denison’s caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR’s GIS based Method for Assessing Cumulative Environmental Effects).</p> <p>Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.</p>		<p>Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>Denison will continue to engage with YNLR on topics of interest.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p>YNLR has shared comments with respect to Woodland Caribou offsets, including those related to the definition of offsets, timing, and mitigation measures as part of present-day mitigation measures for the Project, and should be applied in advance of decommissioning. YNLR has also requested to see the predecommissioning monitoring plan for containment releases. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided a document titled Summary of Monitoring, which outlines the Project’s commitments for monitoring programs for all phases of the Project from preconstruction to post decommissioning. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR</p>	<p>with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	<p>review of the monitoring plans and responses from regulators.</p>		

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		<p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>		<p>interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project’s detailed decommissioning plan. Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison’s previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b></p>				



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				Denison noted the development of the monitoring plans is progressing and that YNLR's review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.				
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> The EIS states: "On the basis of the Project information and related evaluation and assessment of effects, Denison believes that the Project can be constructed, operated, and decommissioned in a manner that is not likely to cause significant adverse effects to the biophysical or human environments." This is perhaps an overly optimistic conclusion. However, YNLR is willing to discuss how the company moves forward and is interested in creating more formal processes to achieve this, such as the signing of an impact benefit agreement.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> This is not an open comment or invitation by Denison to address this concern with any process, commitment, or funding. Further to this; there is no indication in the response that Denison even accepts the YNLR comment hence this issue, raised in the original comments to Denison's EIS remains unresolved.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> No further response provided by YNLR as per letter dated June 19, 2024.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #391)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison notes YNLR's perspective on this.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison and YNLR have collaborated on an appropriate process in relation to the identified comment made by YNLR and both parties are actively working together in this respect.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> No further response from YNLR as per in letter dated June 19, 2024. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p>	Denison and YNLR have collaborated on an appropriate process in relation to the identified comment made by YNLR and both parties are actively working together in this respect. Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> The EIS recognized that the utilization of water will result in an adverse impact on the drainage but dismissed the issue given that a reduction in the stream flow rate is expected to be less than 3%. It would therefore be prudent to closely monitor the flow regime to identify possible adverse effects throughout the life of the Project.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> This comment by Denison is encouraging in that it accepts YNLR's concern for a monitoring requirement. However, it does nothing to address YNLR's position that is must be collaboratively involved in all plans' development and implementation.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on</b></p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #393)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> In the draft EIS, conservative estimate of water taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm. While this incrementally small change in water quantity is beyond the ability of monitoring techniques to practically measure, Denison will conduct hydrological monitoring. Monitoring will likely include streamflow and lake level monitoring as well as continuous monitoring with stage dataloggers with details of monitoring plans to be finalized to support Project permitting and licensing.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licensing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are</p>	<p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licensing process.</p> <p>Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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		<p><b>April 05, 2024)</b> While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>		<p>surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p>		responses from regulators.		
Ya’t’hi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> Utilizing the extent of the LSA and the fact that it does not overlap with projects located within the same drainage system seems to be quite arbitrary and convenient. By this criterion, each mine does not trigger a cumulative effect according to the EIS, although they are all additive to the water flow regime. This methodology then arbitrarily</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> In terms of watersheds and nearby uranium operations, only Key Lake Operation's drainage area interacts with the Wheeler River Project. Drainages from both operations would combine at Russell Lake. As such, the Key Lake Operation was included as an existing project in the CEA sections of the aquatic</p>	Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process.	Denison understands that YNLR expects to inform Denison that this	As per YNLR letter to Denison dated	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p>and conveniently determines that “mitigation measures” for each of the mines is not warranted since there was a determination of no cumulative effects in sections 8.1.7.1, 8.1.7.2, 8.1.7.3 and 8.1.7.4. The determination of Cumulative Effects Characterization and the resultant Determination of Significance is highly subjective, therefore a much more extensive monitoring program is required. Such a program should start prior to the construction phase and carry on at least several years into the operation portion of the Project to at least demonstrate local and cumulative effects of mining projects within the watershed.</p> <p>YNLR agrees that the hydrological monitoring program remain throughout the life of the Project but as per the above, the study should have a much broader mandate in order to measure local and regional effects on VCs.</p> <p>YNLR is concerned that the conclusion that the residual effects from Project operations will not have an adverse effect on surface water is highly speculative. Again, this indicates the need for a comprehensive monitoring program to validate the speculation on water quality with rigorous statistical evidence.</p> <p>YNLR questions the logic track that states, “additional mitigation measures not warranted” because of the determination of no cumulative effects, then “a determination of significance is not warranted” as no cumulative effects were identified for water quality because surface water impacts are expected to remain localized...for all the mining operations in the region. Impacts on water quality and mitigation measures “not warranted” should be demonstrated through field studies and research rather than relying on a theoretical modelling approach.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>These comments do not address the YNLR’s original concern (the residual effects from Project operations will not have an adverse effect on surface water is highly speculative) and the above stated requests for collaboration at the conceptual and methodological stages of monitoring development are reiterated.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>While encouraging, this still does not address YNLR’s concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison’s EIS and revised EIS YNLR, has been consistent in their request to be “involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed”. Denison has been consistent in their responses “to share further information about plans as they are developed”. The Denison response, explicitly, does not address YNLR’s concerns stated in</p>	(Public Comment #394)	<p>environment. The drainages associated with McArthur River Operation and Cigar Lake Operation are separate from the Project.</p> <p>The RSA is the area that surrounds and includes the LSA, and was established to assess the potential, largely indirect effects of the Project, as well as other activities, in a regional context. The RSA is large enough to capture the extent of potential effects (i.e., zone of influence) on a VC and defines the area within which cumulative effects may occur (i.e., cumulative effects assessment boundary). The RSA for the Surface Water Quality VC is bounded by the regional watershed area in which the Project Area is located. The RSA for this assessment is based on the whole watershed within which the Project is located and extends downstream to include Russell Lake (refer to draft EIS Figure 8.2-3). Given the very low magnitude of predicted changes in water quantity in the LSA (in the draft EIS, conservative estimate of water taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm), it would not be measurable further downstream into the RSA.</p> <p>The CEA considers whether residual adverse effects of the Project on a given VC will overlap spatially and/or temporally with the same residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. The CEA follows standard methodology as per provincial (e.g., Guidelines for an Environmental Assessment) and federal guidance (e.g., Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012).</p> <p>Cumulative effects assessment is important to Indigenous communities in general because incremental effects to the environment can weaken resource economies, affect important resources such as plants, fish, and wildlife, affect rights-based and cultural activities, and affect both the health of wildlife and humans. Indigenous perspectives can be complementary to the CEA for the Project, and Denison acknowledges the important relationship of the Indigenous Communities of Interest to the lands and waters. The Indigenous Communities of Interest of ERFN and the Kineepik Métis Local #9 at Pinehouse (KML) have shared their Indigenous Knowledge on past, present, and predicted cumulative effects through the following:</p> <ul style="list-style-type: none"><li>• Wheeler River Project – Summary of Health and Socio-Economic Study Results (ERFN and SVS 2022a);</li><li>• Wheeler River Project - Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b);</li><li>• Kineepik Valued Ecosystem Components – KML Pre-statement for Denison EIS (KML and NVP 2022); and</li><li>• Response to the Environment Impact Assessment For the proposed Ministry of Highways 914 Extension Project (KML and Limnos Environmental 2022).</li></ul> <p>These perspectives on cumulative effects have been summarized in Section 3.4.8 of Section 3. Denison and the Communities of Interest agreed on the high value of this contribution being part of the EIS.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was</p>	Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.	concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	December 17, 2024	

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		<p>YNLR’s letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b></p> <p>YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>		<p>noted by YNLR’s consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps.</p> <p>Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, “YNLR interprets the notion of ‘sharing’ information after its been developed as being non-collaborative and we prefer being ‘involved’ in the program/plan design and development.” Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison’s perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison’s request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.</p> <p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024) )</b></p> <p>During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS).</p>				

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				As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.  <b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR’s review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.				
Ya’t’hi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> There are several comments in the EIS that recognize the potential for a negative effect on water quality from the site water management system into Whitefish Lake. Statements taken from residents have identified concerns about the release of elements such as “mercury” because of the mining activity. While the report recognized that detectable concentrations of mercury will not be produced, the local comment should be considered as a proxy for a variety of contaminants such as selenium, arsenic, cobalt, zinc, etc., as well as the concern expressed by residents, rather than being taken literally as mercury as the only contaminant of concern. YNLR reiterates that concerns about water quality are warranted given that the EIS indicates that there will be a continuous (year-round) average discharge of water from the mine site of more than 36,000 litres/hour for the entire life of the Project. This discharge will be especially evident during low flow periods.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #395)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> The comment from YNLR references text in Section 8.2 of the draft EIS which is the water quality assessment. Please refer to draft EIS Section 8.1 for the water quantity assessment and information on potential changes in water flow. Denison acknowledges the concern raised by YNLR and believes the water quality assessment, including the assessment of potential water quality effects on ecological and human health, presented in the EIS and supporting documentation is robust and supports the conclusions drawn. With regard to YNLR’s concerns around contaminants in treated effluent, we refer YNLR to Appendix 10-A Environmental Risk Assessment (ERA) for Wheeler River. The ERA predicts and assesses the risk to representative human and ecological receptors resulting from exposure to radiological and non-radiological substances expected to be released throughout the Project Phases. The ERA encompasses a human health risk assessment (HHRA) and an ecological risk assessment (EcoRA), which have been prepared to be compliant with Canadian Standards Association Group (CSA) N288.6-12 Environmental Risk Assessments for Class I Nuclear Facilities and Uranium Mines and Mills (CSA, 2012). It also meets the requirements for an ERA outlined in Section 4.1 of Regulatory Document 2.9.1, Environmental Principles, Assessments and Protection Measures (CNSC, 2020). The ERA has been developed with current science and current regulatory attitudes in mind. The predicted radiological and non-radiological to human and ecological receptors demonstrate that the Project can be conducted in a manner that is protective of human and ecological health.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 395. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR’s comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR’s comments in kind and has sought to address YNLR’s concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns.</p>	Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs.  Denison remains committed to engaging with the YNLR on these concerns.	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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				<p><b>Denison Response November 14, 2024 (Response to YNLR Comment June 19, 2024)</b> During a meeting with YNLR, Denison responded to information requests and provided monitoring plans for their review and comment (Section 16 of the EIS). As an outcome of this meeting, Denison requested that YNLR review their concerns as stated in their June 19, 2024 letter.</p> <p><b>Denison response April 2, 2025 (Response to YNLR Comment December 17, 2024)</b> Denison noted the development of the monitoring plans is progressing and that YNLR’s review of the plans should occur in a timely manner to ensure it can be meaningfully incorporated where appropriate.</p>				
Ya’thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> The statement on page 8-151 recognizes that the discharge of treated effluent during the Operation and Decommissioning phase may interact with Cameco’s current releases contributing to cumulative effects. It is recommended that a study be undertaken to assess the basin effect of water discharges.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #398)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> The requested information is presented in draft EIS Section 8.2.7 Cumulative Effects (surface water quality). The summary referenced in the YNLR comment is made in Section 8.3 Fish and Fish Habitat. Specific monitoring and follow-up plans for the Surface Water Quality VC will be prepared to refine and finalize the approach and specific metrics following consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC-specific program.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 398. As such, Denon assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	<p>Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs.</p> <p>Denison remains committed to engaging with the YNLR on these concerns.</p>	Based on Denison’s understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR’s interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.
Ya’thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> Sediment quality of Whitefish Lake and downstream is not “anticipated” to overlap with the Key Lake Operation. It would be prudent to test this hypothesis to ensure that water quality in the flowage is maintained given the high value placed on</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Any changes in sediment quality would be preceded by changes in surface water quality. Should the surface water quality monitoring program identify changes beyond those predicted in the EIS, adaptive management measures would be</p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison’s understanding of the concern or comment,	As per Denison letter to YNLR dated	Denison remains committed to engaging with the YNLR to



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		<p>these waters by residents.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	<p>June 19, 2024) (Public Comment #399)</p>	<p>implemented and may include monitoring of sediment quality further downstream in the watershed. In addition, the Environmental Effects Monitoring (EEM) program under the Diamond Mining and Effluent Regulations will provide a framework for monitoring changes in the aquatic environment.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 399. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>		Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	June 28, 2024	come to resolution.
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> Water management during construction indicates that there is to be no planned discharge to Whitefish Lake. If a release of water from the mine site becomes necessary, in addition to monitoring suspended solid levels, there should be a communication plan to inform area residents of the pending release and its duration.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	<p>YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #400)</p>	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> During Construction, no effluent is expected to be released to the aquatic environment. Contact water stored in the Clean Waste Rock Pond during Construction will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / license requirements. The sequencing of Construction activities will occur in a logical manner based on Project execution plans. For example, construction of the wellfield runoff pond will be prioritized during the early part of Construction, and it will be able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the Clean Waste Rock Pond. Other secondary contingency measures are also available should the volume of water requiring management exceed site infrastructure storage volume. Depending on the situation and volume of water needing management, this could include for example use a hydrovac for offsite disposal. Alternatively, in the instance that there is a planned release of water during construction, this would be permitted by Saskatchewan Ministry of Environment.</p> <p>In accordance with our Indigenous Peoples Policy, Denison is committed to collaborating with Indigenous peoples and communities to build long-term, respectful, trusting, and mutually beneficial relationships. Denison has identified key objectives respecting Indigenous engagement associated with the Project:</p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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				<ul style="list-style-type: none"><li>• Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency.</li><li>• Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion.</li><li>• Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects.</li></ul> In addition, Denison is required to have a Public Information Disclosure Protocol as set out by the CNSC. This would include any notification to the wider public of unplanned discharges.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 400. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.		Denison remains committed to engaging with the YNLR to come to resolution.		
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> in Section 9.4 of the EIS lists Raptors, Migratory Breeding Birds and Bird Species at Risk together (p. 9-320). YNLR questions how and why these three avian VCs were selected and grouped. The three VCs include dozens of breeding bird species with hugely varying habitat requirements, so it is difficult to see how it is possible to accurately predict Project effects for many of these species, especially when so many are lumped together in only one Migratory Breeding Birds VC. In addition, the scarcity of raptors and avian species at risk makes them poor candidates for effects assessments because of low sample sizes. With only two water-based species selected to represent all forest raptors in the Project area, the results and conclusions of this assessment are extremely limited. For the forest birds in particular, this is compounded by the non-inclusion of the historic network of seismic cut lines across the landscape (Appendix 9B), and the resulting underestimation of direct and edge effects.	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #412)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> An EIS requires scoping in order to determine the appropriate content for the assessment and focus the EIS on key areas of concern and relevance. As per standard, accepted EA practice, the EA was organized by and focused on VCs. The VCs are aspects of the biophysical and human environments that will likely be affected (adversely or positively) by the Project. The VCs reflect identified scientific, local knowledge and Indigenous knowledge, and community interests regarding the Project and its potential effects and are typically identified early in the EA process as a result of questions and concerns raised through engagement with government departments and agencies, Indigenous and community groups, and the general public. Key Indicators are an important component or aspect of the VC that is expected to be affected (changed) as a result of the Project. The KIs may comprise subsets or a guild of the VC, certain aspects of the VC that may be affected by the Project and/or which have a particular importance. The three avian VCs (with Key Indicators in brackets) were: Raptors (bald eagle and osprey), Migratory Breeding Birds (waterbirds and waterfowl, upland game birds, and migratory songbirds), and Bird Species at Risk (common nighthawk, short-eared	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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		<p>Species at risk generally make very poor indicators of ecological integrity/biodiversity because of their relative scarcity. In fact, three of the VC bird species at risk selected were not even detected during the Project surveys. This very low quantity and data quality greatly weakens any conclusions regarding the Project residual effects. YNLR cannot find any mention of the extensive seismic line network impacts (Appendix 9B) included in the effects assessment for birds. This was also the case for the caribou and wildlife assessments. The selection of weak indicators and the ad hoc grouping of dissimilar species make these predictions quite unreliable. This potential error is likely compounded by the apparent exclusion of the direct and indirect effects of the existing seismic cutline network (Appendix 9B). Concern about these extensive network of seismic cut lines were also raised by Indigenous People at several places in the EIS.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>		<p>owl, yellow rail, rusty blackbird, and olive-sided flycatcher). The residual effects evaluation was completed on the Key Indicator species. The rationale for selecting these avian Key Indicators is available in Section 9.4.1.2. For instance, the inclusion of Species At Risk birds is a requirement of the Species at Risk Act and the CNSC's REGDOC 2.9.1 also notes that applicants should identify all biological species at risk in the area; the avian Species at Risk were not included in the EIS to be indicators of ecological integrity/biodiversity.</p> <p>The avian effects assessment was habitat based. The assessment methods used a conservative approach with the assumption that, following the implementation of site-specific mitigation measures, the proposed Project activities would have a residual effect on these species' guilds regardless of species presence on site. As described in the EIS, pre-construction surveys will be conducted prior to the commencement of any vegetation clearing or soil disturbance. Avian species will also be routinely monitored throughout the life of the Project. Results from the surveys and monitoring activities are expected to inform the adaptive management process to update Project design and identify the need for additional mitigation measures, if required. Denison is of the professional opinion that the data presented, and analysis provided in the avian assessment of the draft EIS is sufficient given 1) the local / regional environment, 2) the level of interaction of the Project with birds that is expected, and 3) because bird densities are not expected to be limited by habitat regionally.</p> <p>The Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments discusses how existing cutlines were considered in avian assessments. All past anthropogenic disturbances (which includes cutlines to support mineral exploration) were considered in the terrestrial environment assessments. These human disturbances were mapped and considered/addressed appropriately in Section 9 including the Existing Environment, Residual Effects Characterization, and Cumulative Effects Assessment sections, as they relate to Terrain, Soil and Organic Matter/Peat (Section 9.1); Vegetation and Ecosystems, Listed Plant Species and Wetlands (Section 9.2); Ungulates, Furbearers and Woodland Caribou (Section 9.3); Raptors, Migratory Breeding Birds, and Bird Species at Risk (Section 9.4). The cutlines were classified as previously disturbed and considered as low-quality habitat or no habitat, depending on the species being assessed and their habitat requirements. An anthropogenic layer is included on draft EIS, Figure 9.2-6, which includes geophysical cutlines. Please note that anthropogenic features were mapped at IKONOS 1:5,000. This anthropogenic layer is not listed under available habitat types for any of the wildlife or avian VCs in subsequent assessments (e.g., Figures 9.3-9 to 9.3-14, Figures 9.4-8 to 9.4-11, Figures 9.4-13 to 9.4-15) except for Common Nighthawk (Figure 9.4-12), which is a species that is known to use anthropogenic features.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p>		approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.		

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				There have been no further comments from the YNLR on EIS reference no. 412. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b></p> <p>In regard to the potential effects of the Project on breeding bird habitats. When wooded landscapes are subjected to widespread seismic activity, the same effects occur: continuous parcels of forest are divided by miles of cut lines, resulting in smaller habitat patches and greater habitat edge. As a result, bird species that prefer contiguous habitats are declining, while birds that prefer habitat edges are increasing.</p> <p>How will the EIS address already existing direct and indirect impacts of these historic seismic linear disturbances across the LSA and RSA (Appendix 9B) that were ignored.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #413)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>Please refer to the Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments for a discussion of how existing cutlines were considered in avian assessments. All past anthropogenic disturbances (which includes cutlines to support mineral exploration) were considered in the terrestrial environment assessments. These human disturbances were mapped and considered/addressed appropriately in Section 9 including the Existing Environment, Residual Effects Characterization, and Cumulative Effects Assessment sections, as they relate to Terrain, Soil and Organic Matter/Peat (Section 9.1); Vegetation and Ecosystems, Listed Plant Species and Wetlands (Section 9.2); Ungulates, Furbearers and Woodland Caribou (Section 9.3); Raptors, Migratory Breeding Birds, and Bird Species at Risk (Section 9.4). The cutlines were classified as previously disturbed and considered as low-quality habitat or no habitat, depending on the species being assessed and their habitat requirements. An anthropogenic layer is included on draft EIS, Figure 9.2-6, which includes geophysical cutlines. Please note that anthropogenic features were mapped at IKONOS 1:5,000. This anthropogenic layer is not listed under available habitat types for any of the wildlife or avian VCs in subsequent assessments (e.g., Figures 9.3-9 to 9.3-14, Figures 9.4-8 to 9.4-11, Figures 9.4-13 to 9.4-15) except for Common Nighthawk (Figure 9.4-12), which is a species that is known to use anthropogenic features.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p> <p>There have been no further comments from the YNLR on EIS reference no. 413. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to</p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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				engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> Why were amphibians excluded as a VC/KI? Bats? Both were surveyed (Appendix 9B).</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #414)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS and has been included in the response to YNLR (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been included here as Attachment IR-131). This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bats and amphibians.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 414. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> Project monitoring programs specific to Raptors, Migratory Breeding Bird, and Bird Species at Risk VCs are critical, particularly the ongoing repeated surveys throughout the life of the Project, especially given the weak predictive basis for the effects assessments of the Project on breeding bird species.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #415)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> The framework for avian-related monitoring programs are available in Section 9.4.8 of the draft EIS. This includes a discussion of the anticipated adaptive management process. As described in the draft EIS, a wildlife monitoring plan will be developed to support permitting and licensing and implemented as the Project proceeds. The wildlife monitoring plan will provide details on the monitoring and follow-up programs outlined in Section 9.4.8 of the draft EIS.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b></p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken,	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

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		February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.		There have been no further comments from the YNLR on EIS reference no. 415. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.		and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.		
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b></p> <p>There are about three dozen Valued Component/Key Indicators that are assessed for the significance of residual effects (effects that remain after mitigation) from the Project. They include sediment quality, benthic invertebrates, fish and fish habitat, fish health, terrain, soil, organic matter, vegetation abundance, listed plant species, wetlands, ungulates (moose), furbearers (wolverine, pine marten, mink, muskrat), woodland caribou, raptors (bald eagle, osprey), migratory breeding birds (water birds and waterfowl, upland game birds, migratory songbirds), avian species at risk (5), human health and safety, Indigenous land and resource use, other land and resource use, heritage resources, traditional diet, community well-being (income and cohesion), traffic, infrastructure &amp; services, and economics.</p> <p>The residual effects of the Project on all of these VCs/Kis are concluded to be non-significant in the EIS.</p> <p>YNLR questions this overly optimistic and statistically unlikely prediction. For example, the sheer number of fish and wildlife species that the few selected VC/Kis represent would suggest that some will be adversely affected, even if by chance alone. The assessment effectively states that the Project is advantageous and/or neutral to all biophysical and human values, which YNLR rejects. If the Project proceeds, YNLR will want to be closely associated with all project monitoring programs.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b></p> <p>No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b></p> <p>YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #418)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b></p> <p>The draft EIS carefully evaluated the residual adverse effects remaining on VCs and KIs following implementation of mitigation measures. The EIS conservatively identifies where change from existing conditions are expected for each VC or KI, and assesses this change (i.e., the residual effect) for significance. For instance, the wildlife and avian assessments concluded that the residual effects of the Project are not expected to result in a change to the viability and persistence of the VCs and associated KIs and were, therefore, predicted to be not significant. As the review comment correctly notes residual effects identified in the EIS were deemed to be not significant - that is, the level of effect (change) did not meet the threshold of significance as defined for the VC. The EIS also discusses the certainty (and uncertainty) of the conclusions drawn by the assessment. Each VC or KI is evaluated independently and based on specific Project-environment interactions and VC-specific mitigations. Denison is confident that the conclusions drawn in the EIS with respect to potential effects and their significance are supported by the analysis presented.</p> <p>Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b></p> <p>No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p>	<p>Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies.</p> <p>Denison remains committed to engaging with the YNLR on these concerns.</p>	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.



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		February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.		<b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 418. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> There is inconsistent use of YNLRO and YNLR throughout several sections of the EIS. Specifically, YNLRO in section 3, YNLR in sections 4 and 11. As they are used to represent the same thing, only one format should be used.  <b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.  <b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #421)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Editorial issue with inconsistent abbreviations for Ya'thi Néné Land and Resource Office will be corrected in the final EIS and 'YNLR' will be used.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 421. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.	Edit made throughout EIS.  Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> EIS Page 1-1, second paragraph, first sentence states: "The Project falls within the boundaries of Treaty 10, the Nuhtsiye-kwi Benéne (Ancestral Lands) of English River First Nation, the traditional territory of the Kineepik Métis Local #9, the homeland of the Métis, and the Nuhenéné."	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> At first instance of 'Nuhenéné' Denison will recognize: 'Nuhenéné, the traditional territory of the Athabasca Denesųliné.'  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b>	Edit made throughout EIS, including in Section 1 and Section 3.  Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has	As per Denison letter to YNLR dated	Denison remains committed to engaging with the YNLR to come to resolution.



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justificati on of Status	Ongoing Resolution of Concerns (if required)
		<p>YNLR notes that this is a misuse of Nuhenéné as the name of the people. This should be “Nuhenéné, the traditional territory of the Athabasca Denesų́líné”. In reference to section 3.1 of the EIS (p. 3-1 to 3-2), YNLR also notes that the Wheeler River Project falls within Nuhenéné and Athabasca Denesų́líné perspectives and knowledge should have been sought throughout all stages of the Environmental Assessment (EA). Early inclusion in this project would have been beneficial to both the Athabasca Denesų́line communities and to Denison through increased sharing of knowledge.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p>	(Public Comment #422)	<p>No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 422. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>		provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison remains committed to engaging with the YNLR to come to resolution.	June 28, 2024	
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> There YNLR notes that the Hatchet Lake Denesų́líné First Nation, an Athabasca Denesų́líné community, is the closest to the Project. The Wheeler River EIS seems to rely on road distance rather than physical proximity. Road distance should not be utilized to determine community importance or impacts since not all travel methods require continuous roads. Travel to this part of our traditional territory is typically achieved cross country rather than by road. YNLR notes that Hatchet Lake First Nation is located 150 km...Black Lake First Nation is located 180 km...and Fond du Lac First Nation is located 230 km away from the Project as recognised on page 4-47 of the draft EIS. Our community members generally access the Project area via overland routes rather than the established Provincial Road network.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #423)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Thank you for the information.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 423. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR on these concerns.	Based on Denison's understanding of the concern or comment, Denison has provided background information, a clarification on the assumptions and/or approach undertaken, and has outlined a proposed approach forward to the YNLR to reflect the YNLR's interests. Denison	As per Denison letter to YNLR dated June 28, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.				remains committed to engaging with the YNLR to come to resolution.		
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> YNLR notes that there appears to be grammatical errors for page 3-10, last paragraph of the EIS. YNLR requests edits to: "Ya'thi Néné Lands and Resources, the point of contact for and representative of the Athabasca Denesų́łíné communities of Black Lake, Fond du Lac, and Hatchet Lake Denesų́łíné First Nations, as well as the northern hamlets/settlements of Stony Rapids, Wollaston Lake, Uranium City, and Camsell Portage, provided their report; An Exploration of Recorded Athabasca Denesų́łíné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of Denison Mines Wheeler River Project, that summarized traditional knowledge and land use and occupancy information collected for various other projects and initiatives and partially documented Athabasca Denesų́łíné use in the Project area, although it is not considered as a site-specific study."</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #426)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Acknowledged, edit will be made to the EIS.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 426. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> YNLR note that project is within Nuhenéné. There is no need to state the southern edge. It could be argued that the Project is on the northern edge of other Indigenous groups areas. Such descriptions have been applied inconsistently to the groups. Territories should be described in an unbiased manner.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on</b></p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #428)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Noted, EIS will be updated accordingly.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 428. As such, Denison assumes that its responses provided November 2023 are</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		<p><b>April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>		satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> YNLR notes that the EIS text on page 4-61 should recognize that this report was a compilation of existing YNLR data from a variety of projects with differing objectives and study areas, and that no research was commissioned.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.</p> <p><b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #429)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Noted, EIS will be updated accordingly.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 429. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.</p>	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Other	<p><b>YNLR Comment March 4, 2023</b> YNLR believes that the EIS section on page 4-65 referring to the letter sent by Denison dated October 28, 2022 rather than in early October as stated in the draft EIS. Given the draft EIS was submitted to the CNSC on October 24, 2022, four days before Denison responded to YNLR concerns, further opportunity to provide clarifications or specific details for inclusion in the EIS were lost. YNLR does not agree that all our concerns have been addressed in the EIS.</p> <p><b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.</p> <p><b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02</p>	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #430)	<p><b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison understands the EIS involves an iterative process and Denison will continue to engage with YNLR at their direction.</p> <p><b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.</p> <p><b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 430. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to</p>	Denison remains committed to engaging with the YNLR on these concerns.	Denison understands that YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR to come to resolution.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.  <b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR expects to inform Denison that this concern has been addressed in the near future, pending review of the monitoring plans and responses from regulators.		collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns.				
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> YNLR notes that the Athabasca Denesųline had limited opportunity to contribute to VCs. One community virtual meeting was presented to the Athabasca Denesųline, while there appears to have been approximately 12 events for other First Nation communities (combined) including workshops, school presentations, meetings (in person and virtual) and open houses (draft EIS section 4). While YNLR appreciate the opportunity to participate and recognize the impacts of Covid-19, the difference between Athabasca Denesųline participation and other groups is stark.  <b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.  <b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.  <b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #431)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the YNLR office in a mutually agreed upon manner and will continue to do so. Denison understands the EIS involves an iterative process and Denison will continue to engage with YNLR at their direction.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 431. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> YNLR notes that the Map of BQ Caribou Range in draft EIS Section 11.1.3.3.26 is misdated, it should be BQCMB 2012. The original source map is dated 2000, but includes telemetry data from 2012 so is more appropriately dated as 2012.  <b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.  <b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #434)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Noted, the map included in Section 11.1.3.2.6 (Figure 11.1-5) will be updated to reflect the appropriate date.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 434. As such, Denison assumes that its responses provided November 2023 are	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.  <b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.		satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> YNLR notes, as they did previously, that they are unclear what the relevance of including these sources is, since neither the CBEMP nor the Tazi Twé project investigated land use in the Wheeler River area. The March 2022 YNLR compilation report provides clear indications that the Athabasca Denesųline communities utilize the areas in the vicinity of the Project.  <b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.  <b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.  <b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #435)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Noted, Denison provided publicly available information on the Community Based Environmental Monitoring Program and the socio-economic baseline assessment for the Tazi Twé Hydroelectric Project EIS to provide context on recorded harvests in locations close to communities and distant from the Project. Section 11.1.3 further provides context from the YNLR 2022 report and their recorded land use in the vicinity of the Project.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 435. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> YNLR notes that the citations on the EIS page 11-40 are listed as YNLR 2020 and should likely be 2022.  <b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.  <b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #436)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Noted, the EIS will be updated.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 436. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.  <b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.		the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> Pages 11-94 and 11-95 of the EIS uses the term historic. YNLR notes that the use of the term historic is prejudicial and incorrect. YNLR were assured by Denison that they had removed the term historic during earlier discussions.  <b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.  <b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.  <b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #437)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison has verified that the term 'historic' is not included or referenced on pages 11-94 or 11-95 of the EIS.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 437. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.
Ya'thi Néné Lands and Resources Office	Other	<b>YNLR Comment March 4, 2023</b> EIS Page 11-100 third- and fourth-lines states “The YNLR described trapping activity by one of its Athabasca Denesųliné member at Keefe Lake to the east of the RSA but did not report any trapping in N-14 (YNLR 2022).” YNLR notes that the reference to trapping in N-14 is perplexing as the Saskatchewan Trappers Association map shows that N-14 is south of the Project area. Further there is a typo: “not” instead of “nor”  <b>YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)</b> No further response provided by YNLR.  <b>YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)</b> YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02	YNLR Public Comments (March 4, 2023, March 13, 2024, and June 19, 2024) (Public Comment #438)	<b>Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)</b> Denison will revise the EIS to correct the typo.  <b>Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)</b> No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.  <b>Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)</b> There have been no further comments from the YNLR on EIS reference no. 438. As such, Denison assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to	Denison remains committed to engaging with the YNLR.	Resolved - agreement reached by both parties	As per YNLR letter to Denison dated December 17, 2024	Denison remains committed to engaging with the YNLR.



Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justificati on of Status	Ongoing Resolution of Concerns (if required)
		February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.  <b>YNLR Comment December 17, 2024 (Response to Denison Comment November 14, 2024)</b> YNLR confirmed that this concern has been addressed.		engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.				

Appendix C-11: PAGC Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Prince Albert Grand Council	Other	<p>Overall Comments from the PAGC submission: The EIS does not address multiple issues related to ecosystems, human health, and the long-term sustainability of the Wheeler River project, particularly Indigenous concerns regarding the loss of caribou, wolverine and other culturally significant animals. There are no details on economic benefits from the mines through Indigenous partnerships, including equity-based participation in the workforce with training opportunities for Indigenous personnel to operate in management roles.</p> <p>[Additional questions on this topic directed to regulators or government entities are included in the CNSC table]</p>	Prince Albert Grand Council (March 6, 2023) (PAGC public comment #564)	<p>The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares. A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations. The Wildlife LSA was designed to capture the majority of the Project effects. The Wildlife LSA extends beyond the Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. Further the Local Study Area for Indigenous Land and Resource Use (Section 11.1) is defined as the Project footprint plus the maximum combined extents of the supporting Valued Components for the Regional Study Area for aquatic, terrestrial, noise, and health as these components can affect the Indigenous resource use environment to ensure that all possible effects to resources were considered. Section 9 describes how consideration of potential effects to wildlife and wildlife habitat are considered within the EIS. In regard to caribou, Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment. Denison utilized Traditional Knowledge provided by Indigenous communities in the assessment and in the development of the Plan.</p> <p>A Human Health Risk Assessment (HHRA) was undertaken for the Project in Section 10. The HHRA evaluated direct exposure to constituents of potential concern (or contaminants) released to air and water, and through indirect exposure to the constituents associated with soil, sediment, and food, such as fish, wildlife, and plants. The assessment was inclusive of information based on use of traditional foods. The overall conclusion of the HHRA was that there would be no significant adverse effects to human health from the Project. Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.</p> <p>Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be with institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and</p>	Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.	Based on Denison’s understanding of the concern or comment, Denison has provided background information and clarification on the assumptions and/or approach undertaken to PAGC.	Response to PAGC comments were submitted on June 06, 2024.	Denison considers the concern resolved.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.				
Prince Albert Grand Council	Current use of lands and resources for traditional purposes; Other	<p>The EIS does not capture Indigenous Elders’ understanding of the human impact, climate change and cumulative effects on wildlife including caribou or other species at risk and the resulting impacts on Indigenous livelihoods. Denison’s EIS states that existing disturbances in the area are from exploration activities with a general description of how disturbances from these activities will be managed. PAGC does not find sufficient evidence that the affected areas can be restored to their former state and will impact woodland caribou habitats.</p> <p>PAGC Elders prioritize the removal or reduction of human disturbances to the landscape for caribou recovery and wish to avoid projects which have a significant environmental impact. PAGC elders do not want to see any animals or plants disappear from the landscapes they use based on their traditional understanding of the relationship between humans and nature. This impacts the ability to practice treaty rights and entitlements to the lands which impact physical and mental health and mixed economy connected to hunting and gathering.</p> <p>PAGC urges Denison to understand and take an eco-cultural approach to preserve wildlife and landscape health when planning mining operations and decommissioning processes. This should include use of Indigenous Knowledge in delineating caribou habitats despite the data and woodland caribou traditional ecological knowledge available in the report published by Mamun and Brook (2017).</p>	Prince Albert Grand Council (March 6, 2023) (PAGC public comment #565)	<p>Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares. A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations. The Wildlife LSA was designed to capture the majority of the Project effects. The LSA extends beyond Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. Section 9 describes how consideration of potential effects to wildlife and wildlife habitat are considered within the EIS. In regard to caribou, Denison has developed a Caribou Management Framework based on discussions between Denison and Saskatchewan Ministry of Environment. Denison utilized Indigenous Knowledge provided by Indigenous communities in the assessment and in the development of the Framework. Denison notes that the objective of Mamun and Brook (2017) was to support the provincial range planning process for conservation of woodland caribou. The range planning process for SK1 is currently underway. As needed, Denison’s Framework will be updated to be consistent with the management goals defined by ENV for SK1. Additionally, as part of its boreal caribou management efforts, the province is working with industry to develop effective and practice approaches to mitigate potential effects of activities on woodland caribou through offsetting. Denison is committed to continue to work with the province to finalize the habitat offset requirement using the province’s habitat offset calculator.</p> <p>Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take an eco-cultural approach but rather one focused on VCs, key indicators and associated measurable parameters, which are standard in impact assessment. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal.</p> <p>Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The</p>	<p>Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights.</p> <p>Denison is committed to continue to work with the province to finalize the habitat offset requirement using the province’s habitat offset calculator.</p> <p>Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure.</p>	Based on Denison’s understanding of the concern or comment, Denison has provided background information and clarification on the assumptions and/or approach undertaken to PAGC.	Response to PAGC comments were submitted on June 06, 2024.	Denison considers the concern resolved.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.				
Prince Albert Grand Council	Current use of lands and resources for traditional purposes; Other	Additional traffic and associated noise from the proposed project are a concern and PAGC requests that Denison puts a speed limit of about 70km/hour for trucks in the boreal forest where woodland caribou reside and are used by barren land caribou in winter.	Prince Albert Grand Council (March 6, 2023) (PAGC public comment #566)	<p>The proposed operation is fly-in, so Project related traffic, and associated noise, to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles. The Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project.</p> <p>Section 12.3.4.2.1 of the draft EIS describes change in traffic as a result of the Project, including truck average annual daily traffic and average annual daily traffic. Given proven mitigation, as described in Section 12.3.5, to be applied to traffic disturbances and associated noise the effects are expected to be minimal. Section 11.1.5 also describes the mitigation measures to reduce the impacts of traffic and noise, among others. For example, air transportation will be used to transport most workers between the Project site and designated pick-up and drop-off points in communities and noise generating equipment will be situated behind on-site obstructions.</p> <p>In regard to caribou, Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment.</p> <p>Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward. As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects where possible. As an example, Section 11.1.5.3 describes that Denison will require truck traffic to slow down to 40 km/hr for a minimum of 2.5 km o either side of the ERFN and KML (Pinehouse #9) cultural camps, which are understood to occur in September and October (but may be adjusted at the communities direction).</p>	<p>On-site staff will not have access to personal (or company) vehicles.</p> <p>As outlined in Denison’s Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples’ connection to the land, and to minimize potential effects where possible. As an example, Section 11.1.5.3 describes that Denison will require truck traffic to slow down to 40 km/hr for a minimum of 2.5 km o either side of the ERFN and KML (Pinehouse #9) cultural camps, which are understood to occur in September and October (but may be adjusted at the communities direction).</p>	Based on Denison’s understanding of the concern or comment, Denison has provided background information and clarification on the assumptions and/or approach undertaken to PAGC.	Response to PAGC comments were submitted on June 06, 2024.	Denison considers the concern resolved.
Prince Albert Grand Council	Other	<p>PAGC finds that science-based models used for EIA reports put Indigenous people at a disadvantage as Indigenous communities are not involved in the collection, analysis and interpretation of data for models. Indigenous culture does not make use of models, rather, they follow natural changes and patterns which sometimes are not reflected in scientific findings.</p> <p>Requesting feedback from Indigenous communities on a report full of models prepared without Indigenous involvement has limited value as PAGC members are not fully engaged throughout the process. This approach is somewhat disrespectful to Indigenous</p>	Prince Albert Grand Council (March 6, 2023) (PAGC public comment #567)	<p>Denison acknowledges that Indigenous ways of knowing are distinct from western science, and have included Indigenous knowledge shared by communities in the impact assessment process. For example, Section 10.1.2 describes that Indigenous Knowledge and Local Knowledge were used to inform assumptions used in the human health risk assessment which helped identify human health receptors (i.e., people) who consume traditional foods, specifically in terms of their locations, residency times, and components of the traditional foods diet. In this instance, Indigenous knowledge was used to complement western science.</p> <p>Denison remains committed to conducting meaningful engagement with</p>	Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights.	Based on Denison’s understanding of the concern or comment, Denison has provided background information and	Response to PAGC comments were submitted on June 06, 2024.	Denison considers the concern resolved.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
		communities as they are not part of the development process and PAGC reserves the right to reject the EIA or EIS. PAGC requests a commitment from Denison to get Indigenous communities involved in each stage of the documentation and report preparation process.		Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. Through the environmental assessment process ERFN and other Indigenous communities have opted to utilize third party supports to complement their review of the EIS. Third party reviews were supported by both agreements executed between Denison and Indigenous communities, along with participant funding offered by the CNSC. Section 4 of the EIS describes the engagement undertaken with Indigenous communities and organizations. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, and an example of their continued involvement from the outset to end of a process includes the commitment to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project.	Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project. , and an example of their continued involvement from the outset to end of a process includes the commitment to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project.	clarification on the assumptions and/or approach undertaken to PAGC.		
Prince Albert Grand Council	Health and socio-economic conditions	PAGC request additional details from Denison regarding plans to incorporate Indigenous partnership in the economic benefit of the mines, equity-based participation in the workforce and training opportunities for Indigenous personnel to operate in management roles. PACG suggest arranging long-term funding for youth education in science that would prepare them for careers in biology and environmental science, which is very uncommon among Indigenous communities. Increasing Indigenous representation in science and technology, and participation in development planning is therefore a valuable long-term goal.	Prince Albert Grand Council (March 6, 2023) (PAGC public comment #568)	As outlined in Denison’s Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan’s North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist	As outlined in Denison’s Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items).	Based on Denison’s understanding of the concern or comment, Denison has provided background information and clarification on the assumptions and/or approach undertaken to PAGC.	Response to PAGC comments were submitted on June 06, 2024.	Denison considers the concern resolved.

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				in determining hiring and training practices during all phases of the Project. This may include initiatives associated with youth education in science if that is the interest and priority of the communities. Training could also include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.				