



25-H9 - CNSC Staff Submission

Denison Mines Corp. Licence Application to Prepare Site and Construct the Wheeler River Project

Classification	UNCLASSIFIED
CMD Type	Original
CMD Number	25-H9 (VOLUME 2)
Reference CMD(s)	N/A
Type of Licensing CMD	A New Licence
Hearing	Commission Public Hearing - Part 1 (CNSC staff and proponent)
Date of Hearing	October 8, 2025
Word and PDF e-Doc #	7369970 – Word 7559612 – PDF
Summary	<p>This CMD presents information about the following matters of regulatory interest with respect to the proposed Wheeler River Project:</p> <ul style="list-style-type: none">• CNSC staff’s review, assessment and recommendations regarding the request by Denison Mines Corp. for the Commission to issue a licence to prepare site and construct the Wheeler River Project, which would consist of a uranium mine and mill. <p>CNSC staff recommend the Commission consider taking the following actions:</p> <ul style="list-style-type: none">• determine the Wheeler River Project is not likely to cause significant adverse environmental effects referred to in subsections 5(1) and 5(2) of the <i>Canadian Environmental Assessment Act, 2012</i>,• conclude, pursuant to paragraphs 24(4)(a) and (b) of the <i>Nuclear Safety and Control Act</i> in that Denison:



	<p>a) Is qualified to carry on the activities authorized by the licence</p> <p>b) Will make adequate provision for the protection of the environment, the health and safety of persons and the maintenance of national security and measures required to implement international obligations to which Canada has agreed</p> <ul style="list-style-type: none">• Approve Denison Mines Corp.'s application to prepare site and construct the Wheeler River Project• Determine that CNSC, as an agent of the crown, has upheld the honour of the crown and has fulfilled its common law obligations to consult and where appropriate accommodate Indigenous Peoples, pursuant to section 35 of the <i>Constitution Act</i>, 1982• Delegate authority to CNSC staff as set out in section 5.5 of this CMD.
Sommaire	<p>Le présent CMD présente de l'information sur les questions d'ordre réglementaire suivantes concernant le projet proposé de Wheeler River :</p> <ul style="list-style-type: none">• Examen, évaluation et recommandations du personnel de la CCSN concernant la demande de Denison Mines Corp. visant la délivrance, par la Commission, d'un permis de préparation de l'emplacement et de construction pour le projet de Wheeler River, qui comprendrait une mine et une usine de concentration d'uranium. <p>La Commission pourrait considérer prendre les mesures suivantes :</p> <ul style="list-style-type: none">• déterminer que le projet de Wheeler River n'est pas susceptible d'entraîner les effets environnementaux négatifs importants visés aux paragraphes 5(1) et 5(2) de la <i>Loi canadienne sur l'évaluation environnementale (2012)</i>;• conclure que Denison, conformément aux alinéas 24(4)a) et b) de la <i>Loi sur la sûreté et la réglementation nucléaires</i> :<ul style="list-style-type: none">• a) est compétente pour exercer les activités visées par le permis;• b) prendra les mesures voulues pour préserver la santé et la sécurité des personnes, protéger



	<p>l'environnement, maintenir la sécurité nationale et respecter les obligations internationales que le Canada a assumées;</p> <ul style="list-style-type: none">• approuver la demande de Denison Mines Corp. visant à préparer le site du projet de Wheeler River et à entamer les activités de construction;• déterminer que la CCSN, en tant que mandataire de la Couronne, a préservé l'honneur de la Couronne et s'est acquittée de son obligation, aux termes de la common law, de consulter les peuples autochtones et, le cas échéant, de prendre des mesures d'accommodement en vertu de l'article 35 de la <i>Loi constitutionnelle de 1982</i>;• déléguer au personnel de la CCSN le pouvoir décrit à la section 5.5 du présent CMD.
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CMD 25-H9

Licence Application to Prepare Site and Construct the Wheeler River Project

2025-08-12

Signed by:

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Director General, Directorate of Nuclear Cycle and Facilities Regulations

Appendix A Issues Tracking Tables

A.1 Issues Tracking Table for English River First Nation (ERFN) with respect to the Wheeler River Project

Note – CNSC staff shared this table with ERFN for their review on June 27th, 2025. On July 22nd, 2025 ERFN confirmed that the information presented accurately reflects ERFN's views on the issues and concerns raised to date.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
ERFN01	<p>Aquatic environment and contamination</p> <p>ERFN has expressed concerns about the potential for toxic spills and unplanned liquid releases resulting from the proposed project if it were to be approved. ERFN referred to past incidences at Key Lake when discussing this topic but noted that the proposed in-situ recovery for this project raises new concerns relating to contamination and potential impacts caused by human-induced seismic activities.</p> <p>ERFN has identified that they are concerned about the potential of mining fluid impacting both</p>	Aquatic environment/groundwater/fish and fish habitat, accidents and malfunctions	<p>The CNSC acknowledges ERFN's concerns regarding the potential for accidents and malfunctions and the associated potential impacts on the environment, including on groundwater and surface water.</p> <p>Denison has committed to implementing robust containment measures such as secondary containment stormwater management infrastructure and holding ponds to prevent spills to the environment. In addition, Denison has committed to designing a water treatment plant which will ensure that the effluent will be below the regulatory limits in the Metal and Diamond Mining Effluent Regulations (MDMER).</p>	CNSC staff's view is that this concern has been addressed and will be addressed on an ongoing basis, if the project proceeds through an ongoing regulatory oversight of the environmental protection program.

	<p>groundwater and surface water (most notable Cree Lake and Wheeler River), including impacts to pH and acidity. In turn, this could impact ERFN's ability to fish and access the waterways, in addition to potential direct impacts to water quality, the aquatic environment, and fish and fish habitat.</p>		<p>CNSC staff have reviewed Denison's effluent monitoring plan and spill management plan and are satisfied that the proposed mitigation measures will ensure that the environment and human health are protected.</p> <p>Denison has committed to the implementation of a freeze wall and double-walled piping with leak detection to effectively prevent the mining solution from migrating away from the mining site. Denison has also committed to conducting groundwater remediation following cessation of operation to achieve the groundwater remediation target. In addition, Denison's Groundwater Protection and Monitoring Plan and surface water monitoring program will confirm the accuracy of the prediction and effectiveness of the mitigation measures. Denison has assessed the potential impacts caused by human-induced seismic activities and concluded that its impact is negligible. CNSC staff have reviewed Denison's assessment and proposed mitigation measures and satisfied that the proposed project's overall risk of groundwater contamination and induced seismicity is low.</p>	
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			<p>CNSC staff are satisfied that Denison's proposed project, including its various safety features and components, meet regulatory requirements and that Denison will have effective mitigation and prevention measures in place in the unlikely event of an unplanned release, if the project is approved. CNSC staff would also ensure compliance of the facility against all relevant regulatory requirements through various compliance activities, including regular inspections and desktop reviews. Verification of compliance criteria, performance indicators, and EA predictions will be completed, and regulatory requirements for corrective actions applied as necessary if an accident, malfunction, and/or exceedance of compliance criteria or unacceptable level of risk were to occur.</p> <p>CNSC staff remain committed to engaging and collaborating with ERFN on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
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ERFN02	<p>Wildlife habitat and species at risk</p> <p>ERFN is worried about potential environmental effects caused by the project on various areas of concern, including on habitat for various key species in the region (such as caribou and moose) and on wetlands and species depending on wetlands to maintain their lifecycle. ERFN has also expressed concerns about potential disruptions to wildlife behaviour and ecosystems.</p>	<p>Terrestrial environment/species at risk</p>	<p>Denison has committed to avoiding disruption of critical habitats to the extent possible and to implementing appropriate mitigation measures, including scheduling certain project activities outside of timeframes that are sensitive periods for wildlife and avoiding wetlands and instituting proper buffers, whenever possible, and will have a Road and Traffic Monitoring Plan and Pre-Clearance Wildlife Monitoring Plan. Denison has also developed the Caribou Management Framework, which highlights additional mitigation (offset) measures specific to potential residual effects on caribou, and the Biodiversity Management Plan (for terrestrial and avian species).</p> <p>CNSC staff are of the view that ERFN's concerns relating to wildlife, wildlife habitat, and species at risk have and will continue to be addressed through the responses and commitments of Denison and CNSC staff. Effectiveness of the mitigation measures and commitments will be verified by CNSC staff through an environmental assessment follow-up and monitoring program and CNSC staff's compliance</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>
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			<p>activities throughout the lifecycle of the facility, if it is approved.</p> <p>In addition, CNSC staff and ERFN are working together on a rights impact assessment (RIA) for this proposed project, which will help guide future cooperation and consultation on this file.</p> <p>CNSC staff remain committed to engaging and collaborating with ERFN on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
ERFN03	<p>Cumulative effects and long-term impacts</p> <p>ERFN is concerned about the combined impacts of the proposed project with past and existing developments in the region. More specifically, ERFN believe there may be long-term cumulative impacts on areas such as the local ecosystems, terrestrial and aquatic biota, and water quality.</p> <p>ERFN has also raised concerns about the long-term impacts of climate change on permafrost and the environment surrounding the proposed project site.</p>	Cumulative effects/terrestrial environment/aquatic environment/climate change/traditional practices	<p>The CNSC recognizes the importance of assessing cumulative and long-term effects for proposed projects, including those from past developments and from climate change.</p> <p>Denison has included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on ecosystems and Indigenous land and resource use. Denison also included climate change considerations within their assessment. In addition, going forward, Denison has committed to working with ERFN to facilitate</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

	In addition, ERFN is concerned about the impact of cumulative effects on their traditional activities, which are strongly tied to the environment and wildlife.		<p>ERFN's involvement in the environmental risk assessment updates and reviews of those updates, to ensure that Traditional Knowledge and perspectives continue to be considered as part of the project long-term monitoring and planning.</p> <p>CNSC staff are satisfied with how Denison addressed cumulative effects within their Environmental Impact Statement as per the requirements of CEAA 2012, consistent with <i>Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012</i>. [17] CNSC staff expect Denison to continue engaging with ERFN on these topics if the project is approved.</p>	
ERFN04	<p>Air quality and noise</p> <p>ERFN has expressed concerns that the proposed project may affect air quality, wildlife and wildlife behaviour, and human health due to noise and pollutants.</p>	Atmospheric environment/terrestrial environment/human health	Denison has assessed potential impacts caused by the proposed project via changes in air quality and acoustics through modelling. Denison has also committed to mitigation measures to address the potential impacts, such as dust suppression techniques and equipment mufflers to reduce acoustic disturbance, to ensure they remain within all applicable limits and regulations.	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			CNSC staff are satisfied with Denison's proposed mitigation measures relating to potential impacts to air quality and noise. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase.	
ERFN05	<p>Culture and community well-being</p> <p>ERFN fears the proposed project will impact the community's ability to practice their tradition activities, such as fishing, hunting, and trapping, which would ultimately undermine their cultural connection to the land (Nuhtsiye-kwi Benéne) and their way of life. In turn, this could have a negative psycho-social impacts, including impacts on mental health, substance abuse, and sexual health.</p> <p>ERFN is concerned that the proposed project underestimates the potential impact on their traditional economy and lifestyle. ERFN has emphasized</p>	Indigenous rights/culture and traditional practices/human health	<p>Denison is continuing to work with ERFN to better understand and address these concerns. Denison has committed to working with ERFN to better understand how follow-up programs might be executed at the community level to address community perspectives and concerns relating to these topics. Denison has also committed to collaborating with ERFN on a monitoring regime that aligns with ERFN's interests and to continue engaging with ERFN throughout the facility lifecycle.</p> <p>In addition, Denison's Human Resource Development Plan includes provisions for community-level engagement and support, and the CNSC expects</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

	the need for protection of collective rights related to land use, and the need to consider broader impacts on community health and well-being, including how changes to ERFN's traditional territory would affect their overall well-being.		<p>Denison to continue working with ERFN leadership to identify and address health and well-being concerns throughout the facility lifecycle.</p> <p>If the proposed project is accepted, Denison has committed to including country foods (e.g. blueberries, fish, etc.) in their environmental monitoring program and will be developing a country food monitoring document to support their licence to operate. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities.</p> <p>CNSC staff are proposing a Project-specific licence condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations (Licence Condition G.6), including ERFN, annually.</p>	
ERFN06	<p>Indigenous Rights and access</p> <p>ERFN has expressed frustrations relating to Denison's engagement process, including the lack of Elder involvement</p>	Indigenous rights/culture and traditional practices/Traditional Knowledge	Denison has since worked directly with ERFN to address these concerns. Denison incorporated ERFN Traditional Knowledge and values/perspectives within the final Environmental Impact	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of

	<p>due to virtual limitations and the limited consideration of Traditional Knowledge within the early drafts of the environmental impact statement.</p> <p>ERFN shared the belief that Denison's misrepresentation of their use of the land has diminished ERFN's actual presence and practice of rights in the study area. In addition, ERFN raised concerns about disruptions to the region's tranquility due to increased access and the limitation of ERFN access due to the potential blockage of Fox Lake Road.</p>		<p>Statement and has identified 'Traditional Economy' as a key indicator within their economic assessment. Denison and ERFN have agreed to an Impact Benefit Agreement (IBA) which addresses many of the issues and concerns that ERFN has raised. ERFN has formally given their consent for the Project to proceed.</p> <p>The CNSC expects Denison to continue to work collaboratively with ERFN to address access issues and concerns and to minimize disruptions on traditional practices and land use. If the proposed project is accepted, CNSC staff will ensure Denison continues to engage meaningfully with ERFN on these topics and concerns. CNSC staff are proposing a Project-specific licence condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, such as ERFN, annually.</p>	<p>Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>
ERFN07	<p>Regulatory oversight and waste</p> <p>ERFN lacks trust in the provincial regulatory process for mining projects and have therefore requested reassurances</p>	<p>Regulatory oversight/waste management/financial guarantee</p>	<p>As the sole nuclear regulator in Canada, the CNSC is committed to upholding the highest standards of environmental protection and safety across all nuclear facilities in Canada. The CNSC regulates nuclear facilities across their</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC</p>

	<p>that the CNSC will uphold high standards of oversight throughout the life of the project, if it is approved.</p> <p>ERFN is concerned about the potential long-term environmental impacts that might arise due to the decommissioning of the facility, including the management of hazardous waste, radioactive waste, and financial guarantees. ERFN has requested that the waste not be stored below-ground.</p>		<p>entire lifecycles and CNSC staff perform various compliance activities to ensure the facilities are operating in a way that is safe for the environment and human health.</p> <p>The CNSC requires that both preliminary decommissioning plans and financial guarantees are in place for nuclear facilities to ensure that decommissioning and waste management commitments and obligations are met by the licensee, including the safe handling and storage of all radioactive materials. In addition, Denison has committed to incorporating or addressing Indigenous concerns into their decommissioning plans as the plans are developed.</p> <p>If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase.</p> <p>CNSC staff are committed to building a meaningful and trusting</p>	<p>staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>
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			relationship with ERFN, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with ERFN on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle.	
ERFN08	<p>Indigenous rights and decision-making</p> <p>ERFN is frustrated with the recent CNSC licensing decisions at other nuclear facilities, particularly regarding safety and Indigenous rights. ERFN feels that to date, the decision-making process of the CNSC has not sufficiently considered Indigenous perspectives and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).</p>	Indigenous rights/UNDRIP/decision making	<p>The CNSC's approach to reconciliation and consultation focuses on establishing strong relationships and improving opportunities for Indigenous participation in decision-making throughout the lifecycle of nuclear facilities and projects. The approach is guided by UNDRIP and the Calls to Action of the Truth and Reconciliation Commission, along with other applicable frameworks and regulations (including <i>REGDOC-3.2.2, Indigenous Engagement</i>).</p> <p>The CNSC is committed to ensuring that Indigenous perspectives are meaningfully considered in all licensing decisions made by the Commission, and that these decisions are made in accordance with the CNSC's approach to reconciliation and consultation. The CNSC ensures that all environmental assessment and</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>.</p> <p>The CNSC's approach to consultation and engagement with Indigenous peoples is mindful of and incorporates the principles articulated in UNDA. The CNSC strives to achieve consensus and secure the free, prior and informed consent (FPIC) of potentially impacted Indigenous Nations and communities on the proposed Project through collaborative consultation approaches that allow for open dialogue and provides opportunities to understand, document, and address the concerns of Indigenous Nations and communities, including measures to avoid or minimize potential impacts to their Rights and interests, to the greatest extent possible. Concerns raised by Indigenous Nations and communities, including related to consent or lack of consent for a project, are considered as part of the consultation process including the public hearing and the Commission's decision-making process. The CNSC also actively</p>	
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			<p>seeks to understand, support and follow an impacted Nation's approach to reaching their position on FPIC for a proposed project and looks to adapt its processes and procedures based on the Nation's processes, laws, customs and requests, where possible. The CNSC's goal is to ensure that the consultation process is robust and works to establish a clear, transparent and collaborative approach to seeking the FPIC of potentially impacted Nations and supporting them in clearly communicating their process and position with regards to consent for the proposed Project to the Commission to inform its decision-making on the Project.</p> <p>The CNSC is committed to continuously improving its consultation and reconciliation processes with Indigenous Nations and communities across Canada. The CNSC and ERFN have signed a TOR for long-term engagement that commits both parties to collaborating and engaging with one another throughout the Project's full lifecycle. Through this TOR, CNSC staff will address ERFN's concerns and ensure that the Nation's perspectives and priorities are reflected in CNSC</p>	
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			<p>staff reports and documentation, including CNSC staff's consultation report and EA report. CNSC staff are committed to supporting ERFN in working with the Commission Registry to ensure that Indigenous culture, protocols and ceremonies are included and reflected in Commission proceedings and decision-making processes.</p> <p>The CNSC is committed to continuous improvement and receiving feedback from Nations on how we can improve our consultation and engagement processes, including how we are adopting and implementing UNDRIP/UNDA. In addition, the CNSC will continue to adapt its processes for consultation, engagement and the implementation of UNDRIP/UNDA as best practices, policies and case law evolves.</p> <p>For more information regarding CNSC's approach to UNDRIP and Commitment to Reconciliation, please see Section 1.2 and 1.3 of this report.</p>	
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A.2 Issues Tracking Table for Kineepik Métis Local (KML) with respect to the Wheeler River Project

Note – CNSC staff shared this table with KML for their review on June 27th, 2025. On July 23rd, 2025 KML confirmed that the information presented accurately reflects KML's views on the issues and concerns raised to date.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
KML01	<p>Waste and emergency management</p> <p>KML advocates for community consultation to ensure proper access to waste and emergency services.</p> <p>In addition, the community remains affected by legacy mining practices. KML insists on developing waste management strategies in collaboration with KML to address these ongoing impacts.</p>	Waste Management/accidents and malfunctions	<p>As the sole nuclear regulator in Canada, the CNSC is committed to upholding the highest standards of environmental protection and safety across all nuclear facilities in Canada. The CNSC regulates nuclear facilities across their entire lifecycles and CNSC staff perform various compliance activities to ensure the facilities are operating in a way that is safe for the environment and human health.</p> <p>The CNSC requires that both preliminary decommissioning plans and financial guarantees are in place for nuclear facilities to ensure that decommissioning and waste management commitments and obligations are met by the licensee, including the safe handling and storage of all radioactive materials. Denison</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>has committed to establishing an Emergency Preparedness and Response Program and to working with KML in discussions about emergency response and highway safety for the project. In addition, Denison has committed to incorporating or addressing Indigenous concerns into their decommissioning plans as the plans are developed. CNSC staff remain committed to engaging and collaborating with KML on follow-up and monitoring activities on this topic and other topics of concerns, should this Project be approved.</p> <p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook</p>	
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			<p>throughout the applicable licensing phase.</p> <p>CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including KML, annually. CNSC staff remain committed to engaging and collaborating with KML on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
KML02	<p>Aquatic environment and groundwater</p> <p>KML has expressed concerns about baseline collection and water flow management in relation to the project and potential impacts on the aquatic environment.</p> <p>In addition, community members lack confidence in mining's ability to protect groundwater, particularly due to legacy project activities. KML has suggested that outreach is necessary to rebuild trust.</p>	<p>Aquatic environment/groundwater/environmental monitoring</p>	<p>The CNSC acknowledges KML's concerns regarding the potential for impacts on the aquatic environment, including on groundwater and water quality and quantity.</p> <p>Denison has committed to robust containment measures for the proposed facility to avoid any impacts on water quality during operation. Denison will conduct groundwater remediation following cessation of operation to achieve the groundwater remediation target. Hydrologic monitoring at the proposed project site will continue in order to track streamflow trends and water levels in the lakes, and fish</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

			<p>and fish habitat monitoring will occur in tandem with the water quality sampling. In addition, Denison will implement a Surface Water Management Program, an Effluent and Emissions Monitoring Program and a Groundwater Protection and Monitoring Plan if the project is accepted. Denison has committed to working with KML on a community specific monitoring regime, suited to both parties' interests and needs. CNSC staff remain committed to engaging and collaborating with KML on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p> <p>CNSC staff have reviewed Denison's plans relating to protection of the aquatic environment and are satisfied that the proposed mitigation measures are protective of the environment and human health, and was determined to have no significant adverse effects to surface water and groundwater.</p> <p>CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous</p>	
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			engagement and implementation of commitments to Nations, including KML, annually. CNSC staff remain committed to engaging and collaborating with KML on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.	
KML03	Cumulative impacts and land use KML has expressed concerns regarding the cumulative effects of multiple projects, including potential impacts on water flow, highway usage, and land access.	Cumulative effects/culture and traditional practices	<p>The CNSC recognizes the importance of assessing cumulative and long-term effects for proposed projects.</p> <p>Denison has included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on aquatic and terrestrial ecosystems and Indigenous land and resource use. Denison has also committed to continuing to work with KML in order to collaborate on community specific monitoring regimes that align with KML's interests.</p> <p>CNSC staff are satisfied with how Denison addressed cumulative effects within their environmental impact statement as per the requirements of CEAA 2012, consistent with Assessing Cumulative Environmental</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p><u>Effects under the Canadian Environmental Assessment Act, 2012 [17]</u>. CNSC staff expect Denison to continue engaging with KML on these topics if the project is approved.</p> <p>CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including KML, annually. CNSC staff remain committed to engaging and collaborating with KML on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
KML04	<p>Highway use and access</p> <p>KML has raised concerns about increased highway activity, particularly from heavy haul vehicles, and the lack of oversight. The proposed expansion of HWY 914 could exacerbate risks to land users and emergency services.</p> <p>In addition, increased access to the area could restrict KML's ability to engage in subsistence</p>	Human health/accidents and malfunctions/traditional practices	<p>While highway upgrades fall outside the CNSC's regulatory scope, the CNSC acknowledges KML's concerns and supports Denison's commitment to work with KML and the Province of Saskatchewan on highway safety. Denison has committed to reducing traffic-related risks through speed limits and signage near cultural camps and to decreasing speed limits during times where KML members may be using portions of the road near culture camps. Denison and KML have agreed to an IBA</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

	<p>harvesting. KML is seeking more information on how highway expansions and the project will affect these practices.</p>		<p>which addresses many of the issues and concerns that KML has raised. KML has formally given consent for the Project to proceed.</p> <p>The CNSC will monitor Denison's implementation of these commitments and encourage continued collaboration with provincial authorities. CNSC staff remain committed to engaging and collaborating with KML on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
KML05	<p>Communication and engagement</p> <p>KML has emphasized the importance of conveying Western knowledge in a way that is understandable and relatable to their community. KML has expressed concerns about new mining methods, fearing potential environmental contamination and the community's inability to fully understand the technology and its impacts. KML also seeks clarity on</p>	Indigenous consultation	<p>As the sole nuclear regulator in Canada, the CNSC is committed to upholding the highest standards of environmental protection and safety across all nuclear facilities in Canada. The CNSC regulates nuclear facilities across their entire lifecycles and CNSC staff perform various compliance activities to ensure the facilities are operating in a way that is safe for the environment and human health, in addition to Indigenous engagement throughout the lifecycle of the facility.</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

	<p>Denison's role in representing other Métis locals.</p> <p>In addition, KML is concerned that post-project, there will be a lack of ongoing engagement with regulators. KML desires a long-term relationship with the CNSC to ensure continued discussions on uranium projects.</p>		<p>The CNSC has held regular meetings with KML and supported Denison's commitment to ongoing engagement. Denison has also committed to culturally sensitive communication and education. The CNSC will continue to ensure that engagement is meaningful and accessible, and that KML's feedback informs project decisions. The CNSC will continue to work with KML on developing a long-term TOR to continue building our relationship and to continue these discussions through that forum. CNSC staff are committed to building a meaningful and trusting relationship with KML, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with KML on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including KML, annually.</p>	
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KML06	<p>Indigenous Knowledge integration</p> <p>There are concerns about the inclusion of Métis Knowledge in the CNSC processes and the uncertainties surrounding the Provincial EA process, particularly regarding exploration rights.</p>	Métis Knowledge/environmental assessment methodology	<p>The CNSC's approach to reconciliation and consultation focuses on establishing strong relationships and improving opportunities for Indigenous participation in decision-making throughout the lifecycle of nuclear facilities and projects. The approach is guided by UNDRIP and the Calls to Action of the Truth and Reconciliation Commission, along with other applicable frameworks and regulations (including <i>REGDOC-3.2.2, Indigenous Engagement</i>). CNSC staff consider all the Métis Knowledge that is shared throughout the assessment process when reviewing the Environmental Impact Statement, drafting the Environmental Assessment Report, and making recommendations to the Commission.</p> <p>The Commission is committed to ensuring that Indigenous perspectives are meaningfully considered in all licensing decisions made by the Commission, and that these decisions are made in accordance with the CNSC's approach to reconciliation and consultation. The CNSC ensures that all environmental assessment and</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.
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			<p>licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>.</p> <p>The CNSC is committed to continuously improving its consultation and reconciliation processes with Indigenous Nations and communities across Canada.</p> <p>The CNSC has considered Métis Knowledge during the EA review through CNSC's developed What We Heard Reports and expects proponents to do the same. Denison has committed to incorporating Métis Knowledge into monitoring and decommissioning plans (Commitments 4-5, 4-7, 4-12). The CNSC will ensure that Métis Knowledge is taken into consideration to support regulatory decision making and that KML is engaged throughout the lifecycle of the project. CNSC staff are committed to supporting KML in working with the Commission Registry to ensure that Indigenous culture, protocols and ceremonies are included and</p>	
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			reflected in Commission proceedings and decision-making processes.	
KML07	<p>Community health and well-being</p> <p>KML believes that Denison may be downplaying the project's impacts on community members and worries about the project's long-term effects on community health, cultural practices, and educational opportunities.</p> <p>KML is concerned about cultural and language loss, particularly the potential negative impacts of increased development and human traffic on traditional practices.</p>	Human health/Indigenous Rights/culture and traditional practices	<p>Denison is continuing to work with KML to better understand and address these concerns. Denison has committed to collaborating with KML on a monitoring regime that aligns with KML's interests and to continue engaging with KML throughout the facility lifecycle.</p> <p>In addition, Denison's Human Resource Development Plan includes provisions for community-level engagement and support, and the CNSC expects Denison to continue working with KML leadership to identify and address health and well-being concerns throughout the facility lifecycle. CNSC staff are committed to building a meaningful and trusting relationship with KML, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with KML on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle.</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including KML, annually. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities.</p> <p>In addition, CNSC staff will be working with KML on a Rights Impact Assessment (RIA) to assess the potential impacts and their potential severity as a result of the Project on the exercise of Indigenous and/or Treaty Rights. The RIA helps to summarize any potential mitigation and/or accommodation measures committed to by the proponent, the CNSC, or other parties as appropriate, that could help avoid, mitigate, reduce or</p>	
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			<p>accommodate any identified impacts, and communicate the process, outcomes and recommendations in a collaborative way to the Commission in support of meeting the Crown's Duty to Consult and Accommodate obligations to potentially impacted Nations and its decision-making process. Denison and KML have agreed to an IBA which addresses many of the issues and concerns that KML has raised. KML has formally given consent for the Project to proceed.</p>	
KML08	<p>Duty to Consult and delegation</p> <p>KML has raised issues with the Province of SK delegating the Duty to Consult to Denison, questioning how this might affect their rights.</p>	Indigenous consultation/Indigenous Treaty Rights	<p>The common-law duty to consult and, where appropriate, accommodate Indigenous Nations and communities applies when the Crown contemplates actions that may adversely affect potential or established Indigenous and/or treaty Rights. The Commission, as an agent of the Crown, must ensure that all licence decisions under the Nuclear Safety and Control Act (NSCA) and decisions under other applicable legislation, uphold the honour of the Crown and consider Indigenous peoples' potential or established Indigenous and/or treaty Rights, pursuant to section 35 of the</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

			<p>Constitution Act, 1982. CNSC staff work in collaboration and consultation with potentially impacted Indigenous Nations and communities including KML to assess potential impacts on Rights and propose mitigation or accommodation measures to address identified impacts.</p> <p>The CNSC does not delegate its consultation responsibilities to the proponent. CNSC has directly consulted and engaged KML throughout the EA and Licensing process for the Wheeler River Project and will continue to do so throughout the lifecycle, if approved. Denison's role is to support, not replace, CNSC's Crown consultation responsibilities. The CNSC will ensure that the honour of the Crown is upheld and that KML's rights are respected. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including KML, annually.</p> <p>Additionally, the CNSC is interested in finalizing a TOR for long-term engagement with KML</p>	
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			that would commit both parties to collaborating and engaging with one another throughout the Project's full lifecycle. TORs can serve as mechanisms to ensure that the CNSC is addressing Nations' concerns and incorporating Nations' perspectives and priorities into CNSC staff reports and documentation, including the consultation report and EA report.	
KML09	<p>Environmental incident management:</p> <p>KML are concerned about the management of environmental incidents and request that engagement occur in a manner the community can fully understand</p>	Accidents and malfunctions	<p>As the sole nuclear regulator in Canada, the CNSC is committed to upholding the highest standards of environmental protection and safety across all nuclear facilities in Canada. The CNSC regulates nuclear facilities across their entire lifecycles and CNSC staff perform various compliance activities to ensure the facilities are operating in a way that is safe for the environment and human health.</p> <p>The CNSC requires that both preliminary decommissioning plans and financial guarantees are in place for nuclear facilities to ensure that decommissioning and waste management commitments and obligations are met by the licensee, including the safe</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>handling and storage of all radioactive materials. In addition, Denison has committed to incorporating or addressing Indigenous concerns, including those from KML, into their decommissioning plans as the plans are developed.</p> <p>If the proposed project is accepted, CNSC staff will ensure Denison's incident response plans are robust and that they are meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase. CNSC staff are committed to building a meaningful and trusting relationship with KML, collaborating with the Nation to address the Nation's issues and concerns, including those related to incidents. CNSC staff remain committed to engaging and collaborating with KML on monitoring, oversight, reporting, and follow-up activities on this topic and other topics of concern, should this Project be approved.</p>	
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KML10	<p>Discrimination and gender equity</p> <p>There are concerns about racial discrimination in hiring and the limited opportunities for women due to restrictive work schedules. KML has expressed worries about the potential negative effects of Denison’s hiring practices on the ability of community members to practice their culture and speak the Cree language, if employed at the project site.</p> <p>In addition, KML has identified the need for funding to support community education and training, particularly in STEM and mining, to ensure they can access economic opportunities arising from the project. KML is also requesting funding to address discrimination and to improve opportunities for women in the workforce.</p>	Socio-economic considerations	<p>Although this concern falls outside of the scope of the environmental assessment, Denison has committed to inclusive hiring practices and culturally sensitive employment policies that aim to attract and retain Indigenous workers. This includes Denison encouraging workers to speak language of choice while at the site and facilitating time off for Indigenous peoples to participate in cultural activities with their families and communities, where appropriate. Denison has also committed to education and training programs for local communities. Denison and KML have agreed to an IBA which addresses many of the issues and concerns that KML has raised. KML has formally given consent for the Project to proceed.</p> <p>CNSC staff will monitor the implementation through compliance inspections where CNSC can speak to onsite workers, if the project is approved. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments</p>	CNSC staff’s view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC’s mandate and regulatory requirements.
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			to Nations, including KML, annually.	
KML11	<p>Long term impacts and land use</p> <p>KML is worried about the loss of land access for traditional practices, the impact of increased development on community and the environment, and the threat to cultural practices, including language loss. KML is concerned that increasing projects and mineral exploration will severely limit their ability to continue using the land north of the Haultain River for traditional practices.</p> <p>KML is seeking ongoing community consultation for this proposed project, particularly on the topic of cumulative effects. KML wants a long-term relationship with regulations and further engagement on environmental incident management, to ensure there is no loss of</p>	Indigenous Rights/traditional practices/cumulative effects/culture and traditional practices/Indigenous consultation	<p>The CNSC recognizes the importance of assessing long-term and cumulative effects for proposed projects on the environment and surrounding communities.</p> <p>CNSC staff are of the view that KML's concerns relating to long-term impacts have and will continue to be addressed through the responses and commitments of Denison and CNSC staff. Denison has included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on ecosystems and Indigenous land and resource use. In addition to various mitigation measures and monitoring programs, Denison has committed to working with KML on a community specific monitoring regime, suited to both parties' interests and needs. Denison has also committed to ongoing engagement with interested Indigenous Nations and communities throughout the lifecycle of the project, to ensure</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

	consultation once the project is completed.		<p>any issues or concerns are discussed and addressed to the extent possible. Denison and KML have agreed to an IBA which addresses many of the issues and concerns that KML has raised. KML has formally given consent for the Project to proceed.</p> <p>Effectiveness of the mitigation measures and commitments will be implemented by Denison through an environmental assessment follow-up and monitoring program reviewed and verified by CNSC staff through compliance activities and inspections conducted throughout the lifecycle of the facility, if it is approved. CNSC staff expect Denison to continue engaging with KML on these topics if the project is approved, and the CNSC will continue to engage directly with KML throughout the lifecycle of the facility. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including KML, annually.</p>	
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			In addition, CNSC staff and KML are working together on a rights impact assessment (RIA) for this proposed project, which will help guide all future cooperation and consultation on this file.	
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A.3 Issues Tracking Table for Ya'thi Néné Lands and Resources (YNLR) with respect to the Wheeler River Project

Note – CNSC staff shared this table with YNLR for their review on June 27th, 2025. CNSC staff followed up with YNLR on July 17th, 2025. No response was received. If feedback is provided by YNLR at a later date, this information will be included in a supplemental submission which will be submitted to the Commission in advance of the Part 2 hearing.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
YNLR01	Aquatic environment and contamination YNLR has expressed concerns about the planned volume of surface and groundwater proposed for use in the project, which could potentially cause impacts to both water quality (through contamination) and quantity, which could cause subsequent impacts to fish and fish habitat.	Aquatic environment/groundwater/fish and fish habitat/accidents and malfunctions	The CNSC acknowledges YNLR's concerns regarding the potential for impacts on the aquatic environment, including on water quality and quantity, fish and fish habitat, and access to Treaty-protected activities, such as fishing. Denison has committed to designing a water treatment plant by conducting a Best Available Technology	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

	<p>In turn, this could cause avoidance of areas around the project and reduced access to Treaty-protected activities, including fishing.</p>		<p>Economically Achievable assessment. This will ensure that the effluent will be below the regulatory limits in the Metal and Diamond Mining Effluent Regulations (MDMER). Therefore, any impacts on water quality are expected to be negligible. Denison's assessments have demonstrated that the impact on surface water and groundwater quantity would be minimal. Hydrologic monitoring at the proposed project site will continue in order to track streamflow trends and water levels in the lakes, and fish and fish habitat monitoring will occur in tandem with the water quality sampling. In addition, Denison has committed to collaborating with YNLR with respect to the groundwater monitoring plans. These monitoring plans will be used to confirm the accuracy of the assessment and effectiveness of the mitigation measures.</p> <p>CNSC staff have reviewed Denison's effluent monitoring plan and spill management plans and are satisfied that the proposed mitigation measures</p>	
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			<p>are protective of the environment and human health, and that the proposed project was determined to have no significant adverse effects to surface water and groundwater.</p> <p>CNSC staff remain committed to engaging and collaborating with YNLR on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
YNLR02	<p>Terrestrial environment and fragmentation</p> <p>YNLR is concerned about the impacts of the proposed project on the terrestrial environment and wildlife, including species such as woodland caribou, ungulates, furbearers, raptors, migratory birds, and species at risk. In addition, YNLR feel that the already heavily disturbed landscape (in part due to seismic cut lines) is in danger of further fragmentation and adverse impacts on vegetation and wetlands.</p> <p>In turn, this could cause avoidance of areas around the project and reduced access to Treaty-protected activities, including hunting and trapping.</p>	Terrestrial environment/species at risk	<p>Denison has committed to avoiding disruption of critical habitats to the extent possible and to implementing appropriate mitigation measures, including scheduling certain project activities outside of timeframes that are sensitive periods for wildlife and avoiding wetlands and instituting proper buffers, whenever possible, and will have a Road and Traffic Monitoring Plan and Pre-Clearance Wildlife Monitoring Plan. Denison has also developed the Caribou Management Framework, which highlights additional mitigation (offset) measures specific to potential residual effects on caribou, and the</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

			<p>Biodiversity Management Plan (for terrestrial and avian species). In addition, Denison has committed to collaborating with YNLR with respect to woodland caribou and other environmental monitoring plans that align with specific areas of interest expressed by YNLR.</p> <p>CNSC staff are of the view YNLR's concerns relating to the terrestrial environment, wildlife, and species at risk have and will continue to be addressed through the responses and commitments of Denison and CNSC staff, as well as proposed Environmental Assessment conditions. Effectiveness of the mitigation measures and commitments will be verified by CNSC staff through an environmental assessment follow-up and monitoring program and CNSC staff's compliance activities throughout the lifecycle of the facility, if it is approved. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and</p>	
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			implementation of commitments to Nations, including YNLR, annually. CNSC staff remain committed to engaging and collaborating with YNLR on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.	
YNLR03	<p>Cumulative impacts and traditional land use</p> <p>YNLR has expressed worries regarding the potential for cumulative effects of this proposed project in conjunction with various industrial developments in the region, which has already significantly reduced the land on which Indigenous peoples can exercise their Indigenous rights. Access to traditional lands and uncontaminated resources is vital for YNLR cultural and subsistence activities.</p> <p>YNLR is concerned that this proposed project will further restrict useable areas for traditional activities and interfere with Indigenous and Treaty rights. YNLR wants these concerns to be meaningfully reflected and addressed within the environmental impact statement.</p>	Cumulative effects/traditional practices/Traditional Knowledge	<p>The CNSC recognizes the importance of assessing cumulative and long-term effects for proposed projects, including those from past and existing developments.</p> <p>Denison committed to further discussions with YNLR on how cumulative effects were undertaken in relation to this proposed project. Denison has also included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on ecosystems and Indigenous land and resource use. Denison also included climate change considerations within their assessment.</p> <p>CNSC staff are satisfied with how Denison addressed</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			cumulative effects within their Environmental Impact Statement as per the requirements of CEAA 2012, consistent with <i>Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012</i> [17]. CNSC staff expect Denison to continue engaging with YNLR on these topics if the project is approved.	
YNLR04	<p>Indigenous consultation and monitoring</p> <p>YNLR has expressed concerns that Denison has not adequately responded to all of YNLR's concerns raised on the Environmental Impact Statement, for which there were limited opportunities to clarify or provide additional details relating to those concerns.</p> <p>YNLR also flagged concerns about the uncertainties surrounding Denison's proposed monitoring plans for the proposed project and YNLR insists on being involved in the design, implementation, and reporting of these programs.</p>	Indigenous rights/culture and traditional practices/Traditional Knowledge/environmental monitoring	CNSC staff have determined that Denison has demonstrated a commitment to working with identified Indigenous Nations and communities, including establishing working relationships and developing engagement work plans. Denison has since reflected local and Traditional Knowledge shared by YNLR and the First Nations it represents within the final Environmental Impact Statement and supporting documentation. Denison has also committed to sharing information on environmental monitoring plans as they develop, to support collaboration on monitoring plans of specific interest with YNLR. CNSC staff are satisfied with these	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>commitments. CNSC staff remain committed to engaging and collaborating with YNLR on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p> <p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program and Environmental Assessment conditions. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and</p>	
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			implementation of commitments to Nations, including YNLR, annually.	
YNLR05	<p>Misrepresentation of information</p> <p>YNLR has expressed beliefs that Denison has misunderstood and misrepresented the information shared with them through a report in the spring of 2022, especially regarding the use of lands for traditional purposes and the impacts on wildlife, including caribou and moose habitat ranges.</p> <p>YNLR also expressed concerns with how Denison has represented the Athabasca Denesų́liné First Nations (particularly Hatchet Lake First Nation), misclassifying them as Indigenous Communities instead of Indigenous Communities of Interest, which diminishes the importance of their traditional land use within the region.</p>	Indigenous Engagement	<p>CNSC staff have determined that Denison has demonstrated a commitment to working with identified Indigenous Nations and communities, including establishing working relationships and developing engagement work plans. In response to concerns on this topic, Denison added Hatchet Lake First Nation (represented by YNLR) as a ‘community of interest’ in the final Environmental Impact Statement for this proposed project. In addition, Denison reflected local and Traditional Knowledge shared by YNLR and the First Nations it represents within the final Environmental Impact Statement and supporting documentation.</p> <p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples’ potential or established Indigenous and/or Treaty Rights, pursuant to Section 35</p>	CNSC staff’s view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC’s mandate and regulatory requirements.

			<p>of the <i>Constitution Act, 1982</i>. As per the requirements and guidance of REGDOC 3.2.2, <i>Indigenous Engagement</i>, CNSC staff expect that Denison will continue engaging with YNLR and other identified Indigenous Nations and communities to identify potential concerns related to impacts on Indigenous and/or treaty rights as a result of the proposed project. Denison will also be required to report to the CNSC regarding their engagement activities if the proposed project is approved. CNSC staff are committed to building a meaningful and trusting relationship with YNLR, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with YNLR on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle.</p>	
YNLR06	<p>Traditional Knowledge and future generations</p> <p>One of YNLR's primary concerns is ensure that the proposed project is sustainable with respect to cultural rights, environmental protection, and socioeconomic</p>	Indigenous rights/culture and traditional practices/Traditional Knowledge	<p>The CNSC recognizes the importance of assessing long-term impacts for proposed projects. Denison has since met with YNLR to discuss these issues and has committed to collaborating with YNLR in respect to woodland caribou</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent</p>

	<p>equity. YNLR values the protection of ecological systems which support traditional activities.</p> <p>Elders are especially concerned about the future availability of wildlife and have requested that Traditional Knowledge be incorporated into the protection efforts for species such as woodland caribou, to ensure future generations have access to abundant wildlife for subsistence.</p>		<p>monitoring plans, groundwater monitoring plans, and other environmental monitoring plans aligning with specific areas of interest expressed by YNLR.</p> <p>CNSC staff are of the view that YNLR's concerns relating to long-term impacts have and will continue to be addressed through the responses and commitments of Denison and CNSC staff, as well as proposed Environmental Assessment conditions. Effectiveness of the mitigation measures and commitments will be verified by CNSC staff through an environmental assessment follow-up and monitoring program and CNSC staff's compliance activities throughout the lifecycle of the facility, if it is approved.</p> <p>In addition, CNSC staff and YNLR are working together on a rights impact assessment (RIA) for this proposed project, which will help guide all future cooperation and consultation on this file.</p> <p>The CNSC and YNLR have signed a TOR for long-term</p>	<p>possible within the CNSC's mandate and regulatory requirements.</p>
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			<p>engagement that commits both parties to collaborating and engaging with one another throughout the Project's full lifecycle. Through this TOR, CNSC staff will address YNLR's concerns and ensure that the Nation's perspectives and priorities are reflected in CNSC staff reports and documentation, including CNSC staff's consultation report and EA report. CNSC staff are committed to supporting YNLR in working with the Commission Registry to ensure that Indigenous culture, protocols and ceremonies are included and reflected in Commission proceedings and decision-making processes. CNSC staff also remain committed to engaging and collaborating with YNLR on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
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A.4 Issues Tracking Table for Métis Nation - Saskatchewan (MN-S) with respect to the Wheeler River Project

Note – CNSC staff shared this table with MN-S for their review on June 25th, 2025. On July 23rd, 2025 MN-S provided feedback and edits. CNSC staff shared an updated version on July 29th, 2025 for MN-S' awareness of the changes made.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
MNS01	<p>Aquatic and terrestrial environments</p> <p>MN-S is worried about possible leaks and contamination in bedrock, particularly the impact on Whitefish and Russell Lake. MN-S has emphasized the need for robust monitoring by Denison, clarity on potential impacts to water resources, and financial guarantees for remediation.</p> <p>MN-S has also expressed concerns over potential impacts on caribou populations and the broader terrestrial ecosystem, in addition to impacts of increased traffic and noise on wildlife.</p>	Aquatic environment/groundwater/fish and fish habitat, accidents and malfunctions/financial guarantee	<p>The CNSC acknowledges MN-S's concerns regarding potential contamination, particularly impacts on Whitefish and Russell Lake. Denison has committed to the implementation of a freeze wall, double-walled piping with leak detection, and a robust groundwater monitoring program to prevent impacts on the groundwater and aquatic environment. In addition, Denison's Groundwater Protection and Monitoring Plan and commitments to remediation provide assurance that environmental protection measures will be put in place if the project is approved.</p> <p>Denison has also committed to avoiding disruption of critical habitats to the extent possible</p>	<p>The MN-S does not deem this issue to be resolved as MN-S indicates Denison and the CNSC have not adequately addressed concerns regarding the effects on the aquatic and terrestrial environment.</p> <p>MN-S notes inconsistent information provided by Denison regarding the basement rock permeability and outstanding concerns regarding the use of a mixing zone for treated effluent entering the receiving waterbody. Potential for contaminants entering the receiving environment pose risks to the Métis exercise of traditional activities and Aboriginal rights.</p>

			<p>and to implementing appropriate mitigation measures, including scheduling certain project activities outside of timeframes that are sensitive periods for wildlife and avoiding wetlands and instituting proper buffers, whenever possible, and will have a Road and Traffic Monitoring Plan and Pre-Clearance Wildlife Monitoring Plan. Denison has also developed the Caribou Management Framework, which highlights additional mitigation (offset) measures specific to potential residual effects on caribou, and the Biodiversity Management Plan (for terrestrial and avian species).</p> <p>In addition, Denison has assessed potential impacts caused by the proposed project via changes in air quality and acoustics through modelling. Denison has also committed to mitigation measures to address the potential impacts, such as dust suppression techniques and equipment mufflers to reduce acoustic disturbance, to ensure they remain within all</p>	<p>In addition, the MN-S asserts that caribou health and recovery potential has not been appropriately considered.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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			<p>applicable limits and regulations.</p> <p>The CNSC requires that both preliminary decommissioning plans and financial guarantees are in place for nuclear facilities to ensure that decommissioning commitments and obligations are met by the licensee, including those relating to the protection of the aquatic environment. In addition, Denison has committed to incorporating or addressing Indigenous concerns into their decommissioning plans as the plans are developed.</p> <p>CNSC staff are satisfied that Denison's proposed project, including its various safety features and components, meet regulatory requirements and that Denison will have efficient mitigation and prevention measures in place to protect the environment. If a licence were to be issued, CNSC staff would also ensure compliance of the facility against all relevant regulatory requirements through various compliance activities, including regular inspections and desktop reviews. CNSC staff remain committed to</p>	
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			engaging and collaborating with MN-S on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.	
MNS02	<p>Cumulative effects and past environmental impacts</p> <p>MN-S feels the cumulative effects assessment does not account for past environmental and social impacts that persist today.</p>	Cumulative Effects	<p>The CNSC recognizes the importance of assessing cumulative effects for proposed projects, particularly in the context of historical and ongoing impacts on Indigenous Nations and communities.</p> <p>Denison has included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on ecosystems and Indigenous land and resource use. Denison considered whether residual adverse effects of the proposed project on a given valued component might overlap spatially or temporally with effects resulting from other past, present, and reasonably foreseeable projects or activities.</p> <p>CNSC staff are satisfied with how Denison addressed cumulative effects within their Environmental Impact</p>	<p>The MN-S does not deem this issue to be resolved as the MN-S maintains that cumulative effects have not been appropriately considered and remain concerned that the Métis exercise of traditional activities and Aboriginal rights will be adversely impacted due to impacts arising from cumulative effects.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>

			Statement as per the requirements of CEAA 2012, consistent with <i>Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012</i> [17]. CNSC staff expect Denison to continue engaging with MN-S on these concerns if the project is approved.	
MNS03	<p>Indigenous participation and trust</p> <p>MN-S has emphasized the need for MN-S involvement in monitoring programs and want Métis members to be trained to sample, analyze, and understand environmental data. MN-S has also flagged indicated that they want their input on mitigation plans to be incorporated.</p>	Indigenous consultation/environmental monitoring	<p>The CNSC is committed to ensuring that Indigenous communities, including MN-S, are meaningfully involved in environmental oversight for the proposed project if it is approved.</p> <p>CNSC staff have determined that Denison has demonstrated a commitment to working with identified Indigenous Nations and communities throughout the life of the project, including establishing working relationships and developing engagement work plans. Denison has since funded and integrated a Métis Knowledge Study into their final Environmental Impact Statement. Denison has also committed to sharing information on environmental monitoring plans with identified Indigenous Nations and</p>	<p>The MN-S does not deem this issue to be resolved as MN-S seeks firm, enforceable commitments, from Denison, the CNSC, or both, to ensure that it can be an active participant in the monitoring process, and can ensure appropriate measures are taken to address any adverse effects of the Project identified through monitoring.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>

			<p>communities as they develop, including the MN-S with respect to decommissioning planning, mitigation, and monitoring.</p> <p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the Constitution Act, 1982. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff remain committed to engaging and collaborating with MN-S on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
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MNS04	<p>Engagement and traditional land use</p> <p>MN-S has expressed dissatisfaction with Denison's engagement, citing misleading logs, lack of outreach, and insufficient consultation on project activities. MN-S has indicated they feel excluded from regulatory discussions and have concerns about Denison's communication with municipalities instead of MN-S.</p> <p>MN-S is concerned about the lack of engagement regarding potential impacts on Métis traditional use activities and cultural practices. MN-S feel their perspectives, including the concerns of NR1 and NR3 communities, have been overlooked.</p>	Indigenous consultation/traditional practices/Indigenous Rights	<p>Denison is required to report on its Indigenous engagement activities and has committed to continued engagement with MN-S at their direction, inclusive of engagement in NR1 and NR3. In addition, Denison has funded and integrated a Métis Knowledge Study into their final Environmental Impact Statement, to ensure Métis knowledge, values, and perspectives are considered throughout the process. Denison has also revised their final Environmental Impact Statement to reflect that the project is being proposed within the MN-S Homeland.</p> <p>CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and</p>	<p>The MN-S does not deem this issue to be resolved as the MN-S maintains that engagement to-date has not been consistent with a consent-based approach, and that the preliminary Denison-MN-S consent-based discussions that commenced in early 2025 were slow to advance and should be provided with a meaningful opportunity to occur before the Project is assessed.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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			implementation of commitments to Nations, including MN-S, annually.	
MNS05	<p>Economic opportunities</p> <p>MN-S is concerned over the lack of concrete economic benefits for Métis communities, limited training opportunities, and insufficient support for Métis people to participate in the workforce.</p> <p>MN-S also raises a concern regarding the loss of the value of the economic resource from the Métis title claim if the Métis title claim is recognized.</p>	Socio-economic considerations	<p>The CNSC acknowledges MN-S's concerns about economic inclusion and is satisfied that Denison's commitments address these concerns. Denison has developed a human resource development plan which prioritizes Indigenous Nations and communities for employment and training, and their procurement strategy emphasizes local Métis businesses.</p> <p>Although CNSC staff cannot speak directly to economic benefit agreements between proponents and Indigenous Nations and communities, CNSC staff encourage MN-S to continue working with Denison to address concerns relating to potential socio-economic impacts and opportunities for MN-S. CNSC staff will continue to monitor Denison's Indigenous engagement to ensure Denison remains responsive and continues to consider and address concerns raised, to the extent possible.</p>	<p>The MN-S does not deem this issue to be resolved as MN-S deems the Aboriginal title claim as central to the Métis effort to strengthen the Métis Nation and advance self-government and institutional sovereignty.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>

			In regard to MN-S' concern on the Métis title claim, CNSC are looking into the title claim to understand how and if it may impact this project. CNSC will continue review information as it is released and encourage MN-S to continue to share any information with CNSC on the Métis title claim. CNSC staff remain committed to engaging and collaborating with MN-S on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.	
MNS06	Community health and well-being MN-S has expressed concerns over potential impacts on community cohesion and health services.	Human health	<p>The CNSC recognizes the importance of community health and wellbeing.</p> <p>Denison's Human Resource Development Plan includes provisions for community-level engagement and support, and the CNSC expects Denison to continue working with MN-S to identify and address health and well-being concerns throughout the facility lifecycle.</p> <p>If the proposed project is accepted, Denison has committed to including country foods (e.g. blueberries, fish, etc.) in their environmental monitoring program and will be</p>	<p>The MN-S does not deem this issue to be resolved as the MN-S remains concerned about activities which result in impacts to communities from illicit substances and transient populations often associated with resource extraction industries. In addition, the MN-S remains concerned that the development of the Aboriginal title claim area will discourage Métis land use in the vicinity of the Project now and in the future.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to</p>

			<p>developing a country food monitoring document to support their licence to operate. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff are committed to building a meaningful and trusting relationship with MN-S, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with MN-S on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle.</p>	<p>continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
MNS07	<p>Waste management and long-term impacts</p> <p>MN-S has expressed concerns about waste disposal methods, hazardous waste storage, and long-term reclamation, fearing contamination and potential abandonment without proper remediation. Additionally, post-decommissioning impacts on animal populations and the ability to harvest are also a concern for MN-S.</p>	<p>Waste management/long-term impacts</p>	<p>As the sole nuclear regulator in Canada, the CNSC is committed to upholding the highest standards of environmental protection and safety for all nuclear facilities across the country. The CNSC regulates nuclear facilities throughout entire facility lifecycles and CNSC staff perform various compliance activities to ensure the facilities are operating in a way that is safe for the environment and human health. CNSC staff are</p>	<p>The MN-S does not deem this issue to be resolved as the The MN-S does not deem this issue to be resolved as the MN-S requests the CNSC to address the MN-S's concerns regarding its Aboriginal title claim, including the loss of socio-economic potential, the potential for alienation from these significant lands through loss of land use knowledge transfers and through stigma, and the potential extinguishment of</p>

			<p>committed to building a meaningful and trusting relationship with MN-S, collaborating with the Nation to address the Nation's issues and concerns. This means engaging and working with MN-S on monitoring, oversight, reporting, and follow-up activities throughout the Project's full lifecycle.</p> <p>The CNSC requires that both preliminary decommissioning plans and financial guarantees are in place for nuclear facilities to ensure that decommissioning and waste management commitments and obligations are met by the licensee, including the safe handling and storage of all radioactive materials. In addition, Denison has committed to incorporating or addressing Indigenous concerns into their decommissioning plans as the plans are developed.</p> <p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty</p>	<p>any Métis exercise of traditional activities and Aboriginal rights.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>
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			<p>Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase. CNSC staff remain committed to engaging and collaborating with MN-S on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
MNS08	<p>Indigenous Consultation and FPIC Process</p> <p>MN-S is concerned that no specific efforts have been made by CNSC and Denison to consider MN-S' position through the lens of Free, Prior, and Informed Consent (FPIC).</p>	Indigenous consultation	<p>CNSC staff acknowledge the issues and concerns that MN-S has raised to date related to the Project. CNSC staff have worked to understand, assess and address the concerns to the greatest extent possible through consultation, having focused discussions, providing detailed responses, reflecting MN-S' views in CNSC's documentation, communicating MN-S's concerns to Denison and discussing the Project at regular scheduled meetings with MN-S to better understand</p>	<p>The MN-S does not deem this issue to be resolved as the MN-S submits that the MN-S has not been afforded a consent-based process.</p> <p>CNSC is committed to working with MN-S and Denison, as appropriate, to continue to engage and find solutions to address any outstanding concerns in advance of the Part 2 Commission hearing.</p>

			<p>their concerns and identify commitments, mitigations and a path forward to addressing the concerns. CNSC staff's view is that the approach to consultation conducted for the Project has been in line with best practises and is flexible based on the specific needs and requests of each potentially impacted Indigenous Nation and community, including MN-S. CNSC will continue to monitor Denison's commitments to MN-S and engagement through the lifecycle of the Project, if approved and ensure that Denison is addressing MN-S' questions, concerns and requests, as per REGDOC: 3.2.2 <i>Indigenous Engagement</i>.</p> <p>CNSC staff are committed to working with MN-S through the RIA process and further consultation on the Project to identify additional commitments, mitigations and a path forward to addressing the concerns related to the Project, as appropriate in order to work towards consensus on the key issues and the Project.</p>	
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			CNSC staff encourage MN-S to share information with CNSC on understanding their FPIC process and position on the Project. CNSC staff will continue to work with MN-S regarding their FPIC process and efforts to work towards seeking their consent for the Project. CNSC staff are proposing a Project-specific license condition requiring Denison to report progress on Indigenous engagement and implementation of commitments to Nations, including MN-S, annually.	
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A.5 Issues Tracking Table for Lac La Ronge Indian Band (LLRIB) with respect to the Wheeler River Project

Note – CNSC staff shared this table with LLRIB for their review on June 27th, 2025. CNSC staff followed up with LLRIB on July 17th, 2025. On July 30th, 2025 LLRIB confirmed that the information presented accurately reflects LLRIB's views on the issues and concerns raised to date.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
LLRIB01	Protection of Treaty Rights and traditional use LLRIB has shared concerns around potential adverse impacts to the ability to hunt, fish and trap for food and/or	Indigenous rights/culture and traditional practices	The CNSC recognizes LLRIB's concerns relating to potential impacts on Treaty Rights and traditional land use. Since being identified as an interested Nation for this proposed project, LLRIB has been included in the environmental assessment process	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of

	<p>the ability to carry out traditional uses including cultural, spiritual or other important sites near the proposed project area.</p>		<p>and invited to share information on land use and rights throughout the process.</p> <p>Denison has committed to ongoing engagement and collaboration with LLRIB alongside commitments relating to incorporating Indigenous perspectives into environmental protection and monitoring. CNSC staff expect that Denison will continue engaging with LLRIB and other identified Indigenous Nations and communities to identify potential concerns related to impacts on Indigenous and/or treaty rights as a result of the proposed project. Denison will also be required to report to the CNSC regarding their engagement activities.</p> <p>If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities.</p>	<p>Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>
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A.6 Issues Tracking Table for Peter Ballantyne Cree Nation (PBCN) with respect to the Wheeler River Project

Note – CNSC staff shared this table with PBCN for their review on June 27th, 2025. CNSC staff followed up with PBCN on July 17th, 2025. No response was received. If feedback is provided by PBCN at a later date, this information will be included in a supplemental submission which will be submitted to the Commission in advance of the Part 2 hearing.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
PBCN01	<p>Engagement and Indigenous and Treaty Rights</p> <p>PBCN is concerned that the project could affect their ability to exercise their Aboriginal and Treaty Rights near the project area. PBCN feel excluded from the engagement process and want to be involved moving forward.</p> <p>PBCN stresses the need for the Crown and Denison to engage them in a meaningful way to identify, assess, mitigate, and reasonably accommodate any impacts on their Rights as rights holders.</p>	Indigenous rights/culture and traditional practices	<p>The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>.</p> <p>While PBCN was not initially identified as a potentially impacted Nation, the CNSC has since taken steps to rectify this. PBCN was awarded participant funding, included in all subsequent communications, and invited to provide input on the draft environmental impact statement and other project documentation as well as awarded funding to attend and participate in the Commission hearing.</p> <p>CNSC staff have met with PBCN and continue to encourage the Nation to share specific information about how their Indigenous Rights and interests may be impacted in the project area. The CNSC remains committed to building a long-</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>term relationship with PBCN and ensuring their concerns are considered throughout the environmental assessment and licensing processes.</p> <p>In addition, Denison has committed to ongoing engagement and sharing of information with Indigenous Nations and communities throughout the project lifecycle. If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff remain committed to engaging and collaborating with PBCN on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
PBCN02	<p>Treaty Rights and socio-economic impacts</p> <p>PBCN aims to ensure that their Treaty Rights, particularly regarding water, are protected and that an Impact Benefit Agreement (IBA) is established with Denison to safeguard the socio-economic and cultural well-being of their members.</p>	<p>Indigenous rights/culture and traditional practices/socio-economic considerations</p>	<p>Denison has committed to robust containment measures for the proposed facility to avoid any impacts on the aquatic environment, including water quality. Hydrologic monitoring at the proposed project site will continue in order to track streamflow trends, and fish and fish habitat monitoring will occur in tandem with the water quality sampling</p> <p>In addition, within their environmental impact statement, Denison has determined that communities within the region are not</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

			<p>expected to experience any significant negative impacts to community well-being stemming from the proposed project. CNSC staff have reviewed Denison's assessment of socio-economic and environmental impacts, along with the proposed mitigation measures, and are satisfied with the findings.</p> <p>Although CNSC staff cannot speak directly to economic benefit agreements between proponents and Indigenous Nations and communities, CNSC staff encourage PBCN to continue working with Denison to address concerns relating to potential socio-economic impacts and opportunities for PBCN. CNSC staff will continue to monitor Denison's Indigenous engagement to ensure Denison remains responsive and continues to consider and address concerns raised, to the extent possible. CNSC staff remain committed to engaging and collaborating with PBCN on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
PBCN03	<p>Lack of capacity funding</p> <p>PBCN is concerned that Denison is not providing the necessary funding to support meaningful engagement, which hinders their ability to assess potential impacts to their rights independently and objectively.</p>	Indigenous consultation/capacity funding	<p>While capacity funding from the proponent is not mandated by the CNSC, Denison has entered into agreements with various Indigenous Nations and communities to support engagement and capacity-building. In addition, Denison has committed to supporting Indigenous participation in various monitoring programs and decommissioning planning, if the project is approved.</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and</p>

			<p>The CNSC encourages PBCN to continue discussing with Denison to explore similar arrangements and discuss concerns going forward.</p>	regulatory requirements.
PBCN04	<p>Misrepresentation of land use information</p> <p>PBCN has raised issues with Denison's use of a draft confidential territory map in the draft environmental impact statement (EIS). PBCN has expressed that the map does not fully represent PBCN's land use and should not be relied upon for decision-making.</p>	Indigenous rights	<p>The CNSC recognizes the importance of accurate and respectful representation of Indigenous land use.</p> <p>Since PBCN's inclusion in the environmental assessment process, the CNSC has encouraged the Nation to provide updated land use information in the project area. Denison is expected to revise and update its documentation to reflect new information received from Indigenous Nations and communities throughout the process. The CNSC expects Denison to continue to work collaboratively with PBCN to ensure their land use information is appropriately represented throughout future project phases, if the project is approved.</p> <p>The Commission is committed to ensuring that Indigenous perspectives are meaningfully considered in all licensing decisions made by the Commission. The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

			Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i> .	
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A.7 Issues Tracking Table for Birch Narrows Dene Nation (BNDN) with respect to the Wheeler River Project

Note – CNSC staff shared this table with BNDN for their review on June 27th, 2025. CNSC staff followed up with BNDN on July 17th, 2025. No response was received. If feedback is provided by BNDN at a later date, this information will be included in a supplemental submission which will be submitted to the Commission in advance of the Part 2 hearing.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
BNDN01	<p>Traditional Knowledge and cultural heritage</p> <p>BNDN has expressed concerns that their Traditional Knowledge and their Traditional Knowledge and Land Use (TKLU) have not been adequately considered and captured in Denison's environmental impact statement (EIS) and supporting documents.</p> <p>BNDN states that the project is located within their traditional territory and believe this information is essential in order</p>	Traditional Knowledge and land use	<p>Both Denison and CNSC staff have met with BNDN over the course of the assessment process in an effort to better understand BNDN's concerns relating to the proposed project and more specifically, their concerns relating to the inclusion of Traditional Knowledge and TKLU.</p> <p>While carrying out their technical reviews of the EIS, CNSC staff ensured that valued components shared by Indigenous Nations and communities were either included directly in Denison's documentation or were represented by appropriate indicators. However, to date, BNDN has not provided the CNSC or</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

	to properly assess potential impacts on their Rights, cultural heritage, and ecological knowledge, and to strengthen to overall assessment.		<p>Denison with specific information regarding their land use in the project area. CNSC staff specialists took into consideration BNDN's concerns on the Environmental Impact Statement when conducting their assessments and determining the potential for impacts within the Environmental Assessment report. The issues and concerns summarized in the Environmental Assessment Report were shared with BNDN for review and input prior to it being finalized.</p> <p>Going forward, as per REGDOC-3.2.2, <i>Indigenous Engagement</i>, CNSC staff will continue to monitor Denison's Indigenous engagement activities, including those relating to the incorporation of Traditional Knowledge and values into Denison's proposed project, if it is approved. CNSC encourage BNDN to share any information regarding land use in the project area with CNSC and Denison. CNSC staff remain committed to engaging and collaborating with BNDN on follow-up and monitoring activities on this topic and other topics of concern, should this Project be approved.</p>	
BNDN02	Workforce and socio-economic impacts	Socio-economic considerations	Within their EIS, Denison has determined that communities within the region are not expected to experience any significant negative	CNSC staff's view is that this concern has and will continue to be addressed through the responses and

	<p>BNDN worries that the transient workforce resulting from the project, were it to be approved, may negatively impact their quality of life.</p> <p>BNDN has requested that through the Duty to Consult and Accommodate, effective and appropriate economic benefits and accommodation measures should be implemented to protect traditional practices, in an effort to minimize potential adverse effects of the project.</p>		<p>impacts to demographics or community well-being stemming from the proposed project. CNSC staff have reviewed Denison's assessment of socio-economic and environmental impacts, along with the proposed mitigation measures, and are satisfied with the findings.</p> <p>Although CNSC staff cannot speak directly to economic benefit agreements between proponents and Indigenous Nations and communities, CNSC staff encourage BNDN to continue working with Denison to address concerns relating to potential socio-economic impacts and opportunities for BNDN. CNSC staff will continue to monitor Denison's Indigenous engagement to ensure Denison remains responsive and continues to consider and address concerns raised, to the extent possible.</p>	<p>commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>
BNDN03	<p>Local study area and community involvement</p> <p>BNDN has expressed concerns about its community not being identified as a community within the local study area, which BNDN claimed has impacted the community's eligibility for priority employment, training, and contraction opportunities.</p>	<p>Socio-economic considerations</p>	<p>Denison has met with BNDN throughout the assessment process to better understand the concerns on this topic, and Denison has committed to keeping BNDN informed throughout the monitoring program design and implementation process. CNSC staff expect Denison to continue engaging and communicating with BNDN on environmental management and</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

	<p>In addition, BNDN feels that this has resulted in Denison not engaging with them on topics relating to environmental management, monitoring, and remediation programs.</p>		<p>monitoring programs in relation to the project, if it is approved.</p> <p>Although CNSC staff cannot speak directly to economic benefit agreements between proponents and Indigenous Nations and communities, CNSC staff encourage BNDN to continue working with Denison to address concerns relating to potential socio-economic impacts and opportunities for BNDN. CNSC staff will continue to monitor Denison's Indigenous engagement to ensure Denison remains responsive and continues to consider and address concerns raised, to the extent possible.</p>	
BNDN04	<p>Water and groundwater concerns</p> <p>BNDN places high importance on protecting water resources. They are concerned about the lack of adequate assessment regarding mercury contamination and groundwater risks, particularly the confidence in Denison's contamination model, potential leaks, and underestimation of water usage.</p> <p>BNDN has requested further studies and dialogue to ensure</p>	<p>Aquatic environment/groundwater</p>	<p>The CNSC acknowledges BNDN's concerns regarding the potential for impacts on the aquatic environment, including on groundwater and water quality. CNSC staff are satisfied with Denison's commitments to collecting additional baseline information on water and sediment quality, including mercury and methyl mercury, from local lakes and rivers prior to development and to monitoring total and methyl mercury and mercury in country foods.</p> <p>Denison has also committed to robust containment measures for the</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

	<p>the project does not degrade natural water resources in their Ancestral Lands.</p>		<p>proposed facility to avoid any impacts on water quality. Denison has committed to treating effluent to meet or exceed the Metal and Diamond Mining Effluent Regulations (MDMER). Further, this is a requirement that the CNSC will ensure has been met Hydrological monitoring at the proposed project site will continue in order to track streamflow trends and water levels in the lakes, and fish and fish habitat monitoring will occur in tandem with the water quality sampling. In addition, Denison will implement a Surface Water Management Program, an Effluent and Emissions Monitoring Program, and a Groundwater Protection and Monitoring Plan, if the project is accepted</p> <p>CNSC staff have reviewed Denison's plans relating to protection of the aquatic environment and are satisfied that the proposed mitigation measures are protective of the environment and human health, and that the proposed project was determined to have no significant adverse effects to surface water and groundwater. CNSC staff remain committed to engaging and collaborating with BNDN on follow-up and monitoring activities on this topic and other</p>	
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			topics of concern, should this Project be approved.	
BNDN05	<p>Environmental and species concerns</p> <p>BNDN believes Denison's fish sampling efforts are inadequate and recommends additional sampling. They also feel that the avoidance buffer for moose and woodland caribou is too small, potentially leading to habitat avoidance.</p> <p>BNDN is concerned that species at risk were excluded from the EIS or not listed as key indicators. Furthermore, BNDN feels the EIS overlooks the cumulative effects of Cameco's operations on atmospheric impacts.</p>	Fish and fish habitat/species at risk/cumulative effects/atmospheric environment	<p>Denison has committed to collecting additional baseline information pertaining to water and sediment quality, including mercury and methyl mercury, from local study area lakes and rivers prior to development, as well as undertaking monitoring of total and methyl mercury and mercury in country foods (i.e., fish tissue). These efforts will help establish/confirm baseline concentrations in fish tissues before construction and support regular monitoring during all project phases. CNSC staff have required Denison to collect some additional aquatic and terrestrial baseline data prior to specific project activities to support an updated risk assessment for licensing.</p> <p>CNSC staff will continue to assess how the proposal meets regulatory requirements prior to the granting of a licence. This includes evaluating habitat protection measures and ensuring that Denison's commitments align with best practices and regulatory expectations for species at risk and wildlife habitat management.</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>CNSC staff are satisfied with Denison’s commitment to share information with BNDN throughout the monitoring program design and implementation process. If the project receives positive environmental assessment and licensing decisions, CNSC staff will ensure Denison meets their commitments through a follow-up and monitoring program, which can span the lifecycle of the facility. This includes compliance with applicable regulatory documents and CSA standards related to environmental protection and species monitoring.</p> <p>Denison will be required to meet the requirements and criteria listed in CNSC’s applicable regulatory documents and CSA standards. These include provisions for assessing and controlling atmospheric emissions and cumulative environmental effects. CNSC staff will perform ongoing monitoring and compliance activities to ensure Denison respects these requirements throughout the lifecycle of the facility. CNSC staff remain committed to engaging and collaborating with BNDN on follow-up and monitoring activities on this</p>	
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			topic and other topics of concern, should this Project be approved.	
BNDN06	<p>Emissions and greenhouse gas concerns</p> <p>BNDN is worried about the project's reliance on burning diesel for operations, urging Denison to consider best available technologies to reduce GHG emissions.</p>	Atmospheric environment	<p>CNSC staff are satisfied with Denison's response that they will implement mitigation measures to reduce greenhouse gas emissions.</p> <p>The CNSC's REGDOC-2.9.1 requires Denison to ensure that their effluent and emissions preventive and control measures are established using best industry practice, incorporating the application of BATEA, ALARA, process optimization, continuous improvement, and the results of an environmental risk assessment. If the proposed project is approved and licence conditions are required, these will be proposed and incorporated into the licence and licence conditions handbook.</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

A.8 Issues Tracking Table for Prince Albert Grand Council (PAGC) with respect to the Wheeler River Project

Note – CNSC staff shared this table with PAGC for their review on June 27th, 2025. CNSC staff followed up with PAGC on July 17th, 2025. No response was received. If feedback is provided by PAGC at a later date, this information will be included in a supplemental submission which will be submitted to the Commission in advance of the Part 2 hearing.

ID	Issue or concern (including impacts to Indigenous and/or Treaty Rights)	Theme	Crown response	Status of issue/concern
PAGC01	<p>Indigenous Rights and Human Health</p> <p>PAGC has expressed concerns about the inadequate involvement of Indigenous Nations and communities in the assessment process, with minimal consideration of issues raised. Indigenous Peoples cannot meaningfully practice their Treaty Rights if their physical and mental health are being impacted. PAGC is especially concerned about lung cancer incidences for Indigenous peoples in the Athabasca regions.</p> <p>In addition, PAGC has indicated that changes to their ability to live off the land is a significant concern to PAGC Nations, including impacts to their ability to practice subsistence activities such as hunting and gathering.</p>	Indigenous Rights/human health/traditional practices	<p>The CNSC is committed to ensuring that Indigenous communities, including PAGC, are meaningfully involved in environmental oversight for the proposed project, if it is approved, and recognizes the importance of community health and wellbeing.</p> <p>Denison's Human Resource Development Plan includes provisions for community-level engagement and support, and the CNSC expects Denison to continue working with PAGC to identify and address health and well-being concerns throughout the facility lifecycle. Denison has included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on ecosystems and Indigenous land and resource use.</p> <p>The CNSC reviews public health reports from Northern Saskatchewan relevant health authorities and conducts health studies of uranium workers, to</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>provide further independent verification that people's health, living near the uranium mines and mills, is protected. Based on current environmental levels of radiation exposures near the uranium mines and mills, the current scientific knowledge about the sources, effects, and risks of ionizing radiation, and relevant local and provincial health information, CNSC staff have not observed and do not expect to observe any adverse health outcomes related to the environmental radiation exposures from the uranium mines and mills.</p> <p>If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff are committed to building a meaningful and trusting relationship with PAGC and engaging the organization to address PAGC's issues and concerns. This means continuing to share information and</p>	
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			provide updates to PAGC, should this Project be approved.	
PAGC02	<p>Climate Change and Species at Risk</p> <p>PAGC is concerned about the vulnerability of the northern environment to project impacts and to climate change. PAGC has expressed that the process does not adequately consider Elders' understanding of human impact on wildlife, including caribou and other species at risk, which subsequently impacts Indigenous livelihoods.</p> <p>The decreasing woodland and barren land caribou populations in northern Saskatchewan are of particular concern to PAGC Nations due to the cultural connections with the animals. Woodland caribou are sensitive to ecosystem changes, and it is doubtful that they will return to their habitat once disturbed.</p>	Cumulative effects/terrestrial environment/climate change/species at risk/traditional practices	<p>Denison has committed to avoiding disruption of critical habitats to the extent possible and to implementing appropriate mitigation measures, including scheduling certain project activities outside of timeframes that are sensitive periods for wildlife and avoiding wetlands and instituting proper buffers, whenever possible, and will have a Road and Traffic Monitoring Plan and Pre-Clearance Wildlife Monitoring Plan. Denison has also developed the Caribou Management Framework, which highlights additional mitigation (offset) measures specific to potential residual effects on caribou, and the Biodiversity Management Plan (for terrestrial and avian species).</p> <p>Denison has also included a cumulative effects assessment within their final Environmental Impact Statement that considers impacts on numerous valued components, including on ecosystems and Indigenous land and resource use. Denison also included climate change considerations within their assessment. Denison has committed</p>	CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.

			<p>to sharing information on environmental monitoring plans with interested Indigenous Nations and communities as they develop, and Denison has implemented Traditional Knowledge from local Indigenous Nations and communities into the Environmental Impact Statement and supporting documentation.</p> <p>CNSC staff are of the view that PAGC's concerns relating to wildlife, wildlife habitat, and species at risk have and will continue to be addressed through the responses and commitments of Denison and CNSC staff, as well as proposed Environmental Assessment conditions. Effectiveness of the mitigation measures and commitments will be verified by CNSC staff through an environmental assessment follow-up and monitoring program and CNSC staff's compliance activities throughout the lifecycle of the facility, if it is approved.</p>	
PAGC03	<p>Environmental Monitoring</p> <p>PAGC has expressed concerns about the excessive reliance on science-based models in the assessment process, which puts Indigenous Peoples at a disadvantage. Often times,</p>	Environmental monitoring/Traditional Knowledge	<p>The CNSC is committed to ensuring that Indigenous communities, including PAGC, are meaningfully involved in environmental oversight for the proposed project, if it is approved.</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the</p>

	<p>Indigenous Peoples are not involved in the collection, analysis, and interpretation of data.</p> <p>PAGC stresses that Denison can set an example for other mining companies through activities such as Indigenous participation in environmental monitoring. This is especially important consider the historic mismanagement of mining operations in the region, as demonstrated by the 38 abandoned mines in the Athabasca region.</p>		<p>CNSC staff have determined that Denison has demonstrated a commitment to working with identified Indigenous Nations and communities throughout the life of the project, including establishing working relationships and developing engagement work plans. Denison has committed to sharing information on environmental monitoring plans with interested Indigenous Nations and communities as they develop, and Denison has implemented Traditional Knowledge from local Indigenous Nations and communities into the Environmental Impact Statement and supporting documentation.</p> <p>The Commission is committed to ensuring that Indigenous perspectives are meaningfully considered in all licensing decisions made by the Commission, and that these decisions are made in accordance with the CNSC's approach to reconciliation and consultation. The CNSC ensures that all environmental assessment and licensing decision uphold the honour of the Crown and uphold Indigenous peoples' potential or established Indigenous and/or Treaty Rights, pursuant to Section 35 of the <i>Constitution Act, 1982</i>.</p>	CNSC's mandate and regulatory requirements.
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			<p>If the proposed project is accepted, CNSC staff will ensure Denison is meeting their commitments through an environmental assessment follow-up and monitoring program and Environmental Assessment conditions. Denison will also have to meet the requirements in their licence conditions handbook throughout the applicable licensing phase and report to the CNSC on their engagement activities. CNSC staff remain committed to engaging and sharing information with PAGC, should the Project be approved.</p>	
PAGC04	<p>Socio-economic and Employment Concerns</p> <p>PAGC is requesting information on Indigenous partnerships in the economic benefits of the mines, including equity-based participation in the workforce with training opportunities for Indigenous personnel to operate in management and decision-making roles.</p> <p>PAGC noted that there is an opportunity for Denison to set an example for other mining companies, through activities such as providing training for</p>	Socio-economic considerations	<p>The CNSC acknowledges PAGC's concerns about economic inclusion and is satisfied that Denison's commitments address these concerns. Denison has developed a human resource development plan which prioritizes Indigenous Nations and communities for employment and training.</p> <p>Although CNSC staff cannot speak directly to economic benefit agreements between proponents and Indigenous Nations and communities, CNSC staff encourage PAGC to continue working with Denison to address concerns relating to potential socio-economic impacts and opportunities</p>	<p>CNSC staff's view is that this concern has and will continue to be addressed through the responses and commitments of Denison and CNSC staff to the extent possible within the CNSC's mandate and regulatory requirements.</p>

	Indigenous members to run mining-related businesses.		for PAGC. CNSC staff will continue to monitor Denison's Indigenous engagement to ensure Denison remains responsive and continues to consider and address concerns raised, to the extent possible.	
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Appendix B Key Correspondence with Indigenous Nations and Communities regarding the Wheeler River Project

B.1 General Correspondence with Indigenous Nations and communities

From: Phaneuf, Marcelle (CNSC/CCSN);
'lawrence.mcintyre@erfn.net'; 'cheyenna.campbell@desnedhe.com'; 'b-tsannie@hotmail.com';
'moniquethomas2016@gmail.com'; 'pdenechezhe@gmail.com'; 'csayazie@hotmail.com';
'tibbeavereye@hotmail.com'; 'louis.mercredi@fonddulac.ca'; 'victorf@sasktel.net'; 'info@fonddulac.ca';
'Garrett.schmidt@yathinene.com'; 'Linda.mcnabb@yathinene.com'; 'eileenmorrison62@yahoo.ca';
Bcc: 'chief1@birchnarrows.ca'; 'bandmanager@birchnarrows.ca'; 'nvp.glen@sasktel.net';
'mcalette@mns.work'; 'b.merasty@mns.work'; 'geraldmorin@hotmail.com'; 'earl.cook@norstep.ca';
'nvp.mike@sasktel.net'; 'vince.pinehousedc@sasktel.net'; 'jtsanniejr@pagc.net';
'creemancon@gmail.com'; 'info@mltc.net'; Levine, Adam (CNSC/CCSN); Zenobi, Adam (CNSC/CCSN);
Akhter, Salman (CNSC/CCSN);
Subject: CNSC receives project description for a new in situ recovery uranium mine
Sent: 2019-04-09 11:56:00 AM

Good day,

On February 19, 2019, Denison Mines Corp. submitted a project description with the intent to develop an in situ recovery (ISR) uranium mine in the Athabasca Basin in northern Saskatchewan, 4 km west of Highway 914 and approximately 600 km north of Saskatoon.

If and when the project description is assessed by the Canadian Nuclear Safety Commission (CNSC) as complete, the next step would be to issue a notice of commencement. The project description would then become available for public comment as part of the environmental assessment process.

A formal letter of notification to your community with more information on the regulatory review process is forthcoming.

For more information on the CNSC's role in licensing uranium mines and mills, please visit:
<http://www.nuclearsafety.gc.ca/eng/uranium/mines-and-mills/index.cfm>

For more information on the CNSC's environmental assessment process, please visit:
<http://www.nuclearsafety.gc.ca/eng/resources/environmental-assessments/index.cfm>

Best regards,

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209



April 15, 2019

e-Doc: 5870914

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Notice of Denison Mines Corp., Wheeler River Project, a Proposal for a New Uranium Mining Project in northern Saskatchewan.

Dear [REDACTED]

The purpose of this letter is to provide you with notice that the Canadian Nuclear Safety Commission (CNSC) has received a project description from Denison Mines Corp. (Denison) to develop a uranium mine located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. The proposed development is called the Wheeler River Project.

The proposed project requires a federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and will require authorization from the CNSC under the *Nuclear Safety and Control Act* (NSCA).

The proposed project includes underground and surface facilities to support the mining and processing of uranium ore using the In Situ Recovery (ISR) mining method. The main components of the project include:

- an ISR wellfield
- two freeze plants on the surface to establish a frozen isolated mining chamber underground
- an on-site plant to process the mining solution recovered from the ISR wellfield
- surface facilities to support the short and long term storage of waste rock
- water handling infrastructure and a water treatment plant
- additional infrastructure to support mining activities including but not limited to a camp for personnel, and supporting facilities such as an airstrip, waste and water management facilities, maintenance shops, warehouses, and offices

Vehicle access to the site would be provided by constructing a seven-kilometre section of road connecting Provincial Highway 914 to the Wheeler River site and a five-kilometre road from the site to the airstrip.

Environmental Assessment and Licensing

As part of their application, Denison will be seeking sequential EA and licensing processes such that EA and licensing matters will be considered at separate public Commission hearings. The Commission must make an EA decision that the project will not cause significant adverse environmental effects prior to making a licensing decision. Denison has submitted a project description to initiate the EA process, but has not yet submitted a full licence application to initiate the licensing process.

The proposed project will require an EA under CEAA 2012. The CNSC will be responsible for making both an EA and a licensing decision for this project. The CNSC is also the Crown Consultation Coordinator for the federal government for the project.

The proposed project is also subject to a provincial environmental assessment as it is a “development” as defined in section 2(d) of *The Environmental Assessment Act*. Therefore, Denison is also required to undertake a provincial EA for the project and seek approval from the Saskatchewan Minister of Environment prior to proceeding with the project. CNSC and the Saskatchewan Environmental Assessment & Stewardship Branch will work closely to coordinate our respective EA processes wherever possible.

Commission Hearing

Before the Commission can make a decision on the licence application, a public hearing will be held to ensure that the Commission has the information it needs, and that Denison and interveners (including Indigenous groups and members of the public) have had a reasonable opportunity to present relevant information to the Commission. The CNSC encourages your participation in the review process, including the public hearing.

The Commission’s public hearing for the Wheeler River Project has not yet been scheduled. We will provide you with an update once further details are confirmed regarding the timing, location and format of the Commission hearing for this project.

For more details on CNSC’s public hearing processes, you can visit the web link:
<http://nuclearsafety.gc.ca/eng/the-commission/hearings/participate/index.cfm>.

Participant Funding Program

The CNSC has established a Participant Funding Program (PFP) to enhance participation in the CNSC’s regulatory processes. Funding for this project will be offered in two phases. The first phase will be for the review of the draft Environmental Impact Statement, while the second phase will be for the remainder of the regulatory process. The availability of the first phase of PFP will be announced within the next few months (around the same time as the Commission makes its decision on the scope

of the EA). Once the availability of funding is announced we will provide you with further details on the application process, scope of funding and amounts available.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>

If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccpf@canada.ca.

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands the importance of consulting and building relationships with Canada's Indigenous peoples.

As an Indigenous group with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project and encourages you, during the review process, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project

Next Steps

Once the final project description has been submitted by Denison, CNSC staff will provide your community with further details on the federal EA process to be followed for the proposed project.

The CNSC will be posting a Notice of Commencement on the Canadian Environmental Assessment Registry within the next few weeks. At the same time as the posting of the Notice of Commencement, the CNSC will also post the project description for a 30 day review and comment period.

As part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the following documents:

- the project description
- the draft Environmental Impact Statement

Indigenous groups and members of the public will also be given the opportunity to submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation).

We are interested in meeting with your community in person, or by teleconference if preferred, to discuss the proposed project, and we would be happy to arrange for this to happen. Please note that the CNSC is also able to offer, upon request, participant funding for such meetings and other related activities to help enable your on-going participation and engagement throughout the EA and regulatory review process.

Staying Informed

The CNSC is committed to ongoing consultation and engagement with you and your Nation in relation to this proposed project and will be providing information updates directly to you at key points in the regulatory process.

In addition, if you wish to receive e-mail notifications when the CNSC's website is updated, including notices for hearings, meetings and PFP funding opportunities, you can sign-up to the CNSC mailing list by visiting the following web link and choosing the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact the Crown Consultation Coordinator on this file, Marcelle Phaneuf, by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,



Candida Cianci
Director, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Location of the proposed Wheeler River uranium mine project

Appendix B: Indigenous Consultation and Engagement at the CNSC (e-Doc: 5862079)

c.c.:

[REDACTED]
P. Fundarek, M. Landon, S. Akhter, M. Phaneuf, A. Levine, A. Zenobi (CNSC)
A. Sadik, B. England (SEASB)

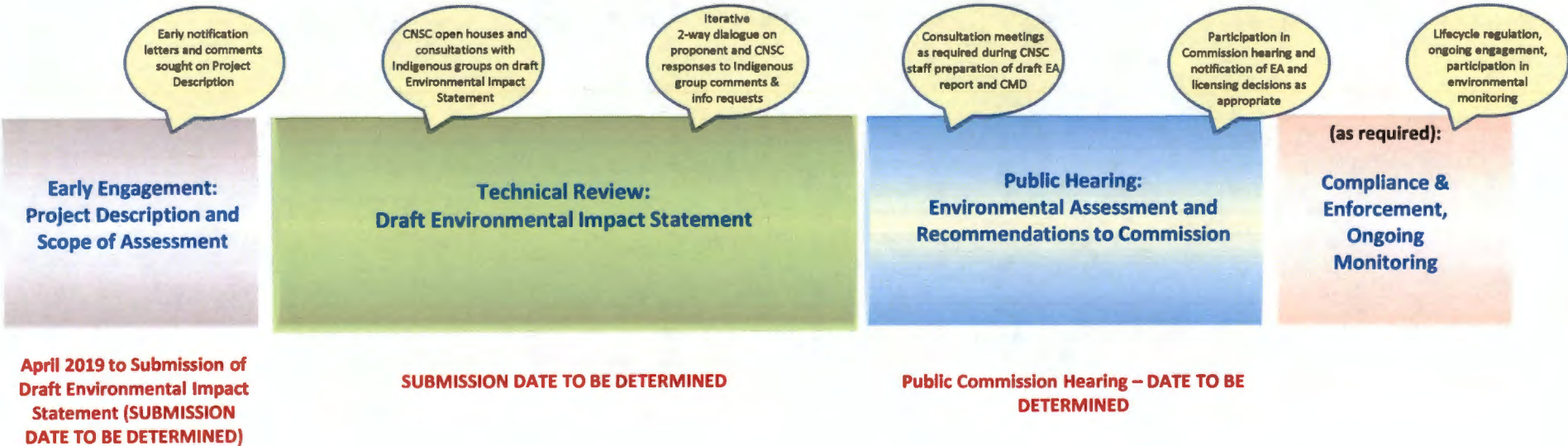
A similar letter was sent to the following groups:

- English River First Nation
- Hatchet Lake First Nation
- Birch Narrows Dene Nation
- Buffalo River Dene Nation
- Black Lake First Nation
- Fond-du-Lac Denesuline First Nation
- Ya'thi Néné Lands and Resource Office
- Prince Albert Grand Council
- Métis Nation of Saskatchewan (Northern Region 1)
- Kineepik Métis Local Pinehouse # 9 (Métis Northern Region 3)
- Meadow Lake Tribal Council

Appendix A: Location of the proposed Wheeler River uranium mine project



Appendix B: Indigenous Consultation and Engagement at the CNSC



From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
['b-tsannie@hotmail.com'](#); ['nvp.glen@sasktel.net'](#); ['leonardmontgrand@yahoo.ca'](#);
['csayazie@hotmail.com'](#); ['louiemercredi.fdl@sasktel.net'](#); ['Garrett.schmidt@yathinene.com'](#);
['chief1@birchnarrows.ca'](#); ['lawrence.mcintyre@erfn.net'](#); ['receptionist@mltc.net'](#);
['eileenmorrison62@yahoo.ca'](#); ['nvp.mike@sasktel.net'](#); ['mcalette@mns.work'](#); ['jtsanniejr@pagc.net'](#);
To: ['mcalette@mns.work'](#); ['b.merasty@mns.work'](#); ['geraldmorin@hotmail.com'](#); ['earl.cook@norstep.ca'](#);
['tibbeavereye@hotmail.com'](#); ['clhmercledi@sasktel.net'](#); ['victorf@sasktel.net'](#);
['fdlreception@sasktel.net'](#); ['Linda.mcnabb@yathinene.com'](#); ['bandmanager@birchnarrows.ca'](#);
['cheyenna.campbell@desnedhe.com'](#); ['vince.pinehousedc@sasktel.net'](#); ['creemancan@gmail.com'](#);
Subject: Public comment period on the Project Description for the proposed Wheeler River Project – Denison Mines Corp.
Sent: 2019-05-31 4:07:00 PM

Follow Up Flag: Follow up

Flag Status: Flagged

Good afternoon,

The Canadian Nuclear Safety Commission (CNSC) is [seeking comments](#) from the public and Indigenous groups on the project description for the proposed Wheeler River Project (<https://www.ceaa.gc.ca/050/documents/p80178/130098E.pdf>).

The project involves the construction of a new uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine.

The CNSC reviewed the project description and determined that it was written in accordance with the Prescribed Information for the Description of a Designated Project Regulations. (These regulations are made under the Canadian Environmental Assessment Act, 2012). Detailed information about the project will be available in the environmental impact statement, which Denison Mines Corp., the proponent, will submit at a later stage of the environmental assessment (EA) process.

Comments on the project description should be based on local, regional or traditional knowledge of the site or surrounding environment, or provide any other relevant information that may help with the conduct of the EA. All comments received will be considered public.

Written comments must be submitted by June 30, 2019, to:

Marcelle Phaneuf, Environmental Assessment Officer
Canadian Nuclear Safety Commission
P.O. Box 1046 Station B
280 Slater Street
Ottawa ON K1P 5S9
Telephone: 613-947-3209 or 1-800-668-5284
Fax: 613-995-5086
Email: cnscc.ea-ee.ccsn@canada.ca

Following receipt of comments on the project description, CNSC staff will consider all submissions received and make recommendations to inform the Commission's decision on the scope of the factors to be considered in the EA. In addition, CNSC staff will respond to all comments received from members of the public and Indigenous groups. The comments and responses will be placed in a table and publicly posted to the Canadian Environmental Assessment Registry. Effort will be made to group common issues together.

Following the Commission's decision on the EA scope, Denison Mines Corp. will then be required to provide to the CNSC an environmental impact statement (EIS) for review. An EIS is a report that a proponent writes to present the technical studies and findings of an EA. The CNSC's Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012 (<http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>) provide general instructions on preparing the EIS and information that must be included in it in order to comply with CEAA 2012 requirements.

If you have any questions, please do not hesitate to contact me at marcelle.phaneuf@canada.ca or by telephone at 613-947-3209.

Kind regards,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada

marcelle.phaneuf@canada.ca / Tél: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
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From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
'[cheyenna.campbell@desnedhe.com](#)'; '[csayazie@hotmail.com](#)'; '[tlbbeavereye@hotmail.com](#)'; '[louiemercredi.fdl@sasktel.net](#)'; '[clhmercledi@sasktel.net](#)'; '[victorf@sasktel.net](#)'; '[fdlreception@sasktel.net](#)'; '[b-tsannie@hotmail.com](#)'; '[moniquethomas2016@gmail.com](#)'; '[pdenechezhe@gmail.com](#)'; '[nvp.glen@sasktel.net](#)'; '[leonardmontgrand@yahoo.ca](#)'; '[mcalette@mns.work](#)'; '[b.merasty@mns.work](#)'; '[geraldmorin@hotmail.com](#)'; '[earl.cook@norstep.ca](#)'; '[nvp.mike@sasktel.net](#)'; '[vince.pinehousedc@sasktel.net](#)'; '[chief1@birchnarrows.ca](#)'; '[bandmanager@birchnarrows.ca](#)'; '[elmercampbell35@gmail.com](#)'; '[receptionist@mltc.net](#)'; '[jtsanniejr@pagc.net](#)'; '[creemancan@gmail.com](#)'; '[garrett.schmidt@yathinene.com](#)'; '[Linda.mcnabb@yathinene.com](#)'; '[michael.dawe@yathinene.com](#)'; [Wylie, Doug \(CNSC/CCSN\)](#); [Zenobi, Adam \(CNSC/CCSN\)](#);
Bcc:
Subject: Wheeler River Project - Commission Decision on the scope of the EA
Attachments: [Record_of_Decision_-_Denison_Mines_Corporation_-_Scope_of_EA_on_the_proposed_Wheeler_River_Project.pdf](#)
Sent: 2019-12-24 8:53:00 AM

Good day,

On December 20th, 2019, the Commission issued a decision on the scope of an environmental assessment for the proposed Wheeler River project. For your convenience, I have attached the Record of Decision to this email. You may also find it on the Registry [here](#).

In the next few weeks, the CNSC will send you a formal letter regarding this decision. The letter will also outline the next steps in the EA process as well as provide information related to participant funding (PFP) for this project.

As always, I am available for any questions or comments related to the Wheeler River project by phone or email. Best regards and best wishes for the holiday season.

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#) on behalf of [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: [REDACTED]
Cc: [REDACTED]
Subject: Letter re Notice of Commission Decision on Scoping of EA for Wheeler River Project and Next Steps
Attachments: [E-DOCS-#6239167-v2A-Letter_-_CNSC_to_BLDNFN_-_Wheeler_River_-_Notificatio....doc](#)
Sent: 2020-03-20 2:34:01 PM

Dear [REDACTED],

The purpose of the attached letter is to notify you that on December 20, 2019, the Canadian Nuclear Safety Commission (CNSC) made a decision on the scope of factors to be considered in the environmental assessment of the Wheeler River Project (the Project) proposed by Denison Mines Corp (Denison).

The letter also informs you of the next steps in the EA process, including the fact that Denison Mines Corp has suspended activities on the environmental assessment.

I remain available for any questions or comments by phone or email,

Best regards

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada

marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada

marcelle.phaneuf@canada.ca / Tél : 613-947-3209



March 10, 2020

e-Doc: 6239167

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Notice of Commission Decision on the Scope of the EA for Denison Mines' Proposed Wheeler River Project

Dear [REDACTED]

The purpose of this letter is to notify you that on December 20, 2019, the Canadian Nuclear Safety Commission (CNSC) made a decision on the scope of factors to be considered in the environmental assessment of the Wheeler River Project (the Project) proposed by Denison Mines Corp (Denison).

The Commission, pursuant to section 19 of the *Canadian Environmental Assessment Act*, 2012 (CEAA 2012), determined the scope of factors to be considered in the environmental assessment (EA) for the Project to include the factors mandated by paragraphs 19(1) (a) to (h) of the CEAA 2012 with no additional factors. The Commission understands that, pursuant to subsection 19(3) of CEAA 2012, the EA for the Project shall consider Indigenous traditional knowledge and community knowledge. See the enclosed copy of the Record of Decision for more details (Appendix A).

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands and values the importance of consulting and building relationships with Indigenous peoples in Canada.

As an Indigenous group with potential interest in this Project, the CNSC is interested in hearing any views [REDACTED] may have with respect to the Project. The CNSC encourages you, throughout the EA process and including but not limited to the review and comment periods, to:

- advise the CNSC of any adverse impacts the Project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns;
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures; and

- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this Project.

██████ participation in the EA and regulatory review process is intended to be supported through the CNSC's Participant Funding Program (PFP). Please note that should additional funding be needed by BLDFN, beyond the funding that will be awarded through the PFP, requests or applications for additional funding will be considered by the CNSC on a case-by-case basis.

Current Status and Next Steps

Now that the scoping decision had been rendered by the Commission, the next step in the process will be the submission by Denison of a draft Environmental Impact Statement (EIS). On March 20th, 2020, Denison placed a hold on EA activities related to the Project. Therefore, the CNSC does not anticipate the draft EIS to be submitted in 2020.

As part of the EA process, ██████ will have the opportunity to provide comments on Denison's draft EIS once it is submitted. In later steps of the process, ██████ will also have the opportunity to comment on CNSC staff's Environmental Assessment (EA) Report and Commission Member Document (CMD), and to submit comments to the Commission for an eventual EA hearing as a written intervention and/or oral presentation. In addition, CNSC staff will continue to reach out with offers to meet and conduct additional consultation and engagement activities throughout the EA process.

The first phase of PFP, for the review of the draft EIS, will be available some months prior to the draft EIS being submitted. The CNSC will be offering \$150,000, to be disbursed among all eligible applicants, to help in the review of the draft EIS. A second phase of PFP will be announced at a later date, to help in the review of the EA report and CMD, and to prepare an intervention for an EA hearing.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process for the Participant Funding Program: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm> If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccpsn@canada.ca.

If you have any questions relating to this Project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact me by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.


Yours sincerely,

Marcelle Phaneuf

Environmental Assessment Officer, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Record of Decision DEC 19-H111 in the Matter of Denison Mines Corporation – Decision on the Scope of an Environmental Assessment of the Proposed Wheeler River Project

c.c.:


P. Fundarek, C. Ciani, C. Cattrysse, M. Landon, S. Akhter, A. Levine, A. Zenobi,
CNSC
A. Sadik, B. England, SEASB

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: [REDACTED];
Fundarek, Peter (CNSC/CCSN); [Nana-Owusua Kwamena \(CNSC/CCSN\)](#) (nana-owusua.kwamena@canada.ca); Cattrysse, Clare (CNSC/CCSN); [Akhter, Salman \(CNSC/CCSN\)](#); [Froess, Ryan \(CNSC/CCSN\)](#); [Zenobi, Adam \(CNSC/CCSN\)](#); ['Sadik, Aimann ENV'](#); [England, Brianne ENV](#);
Cc:
Subject: Update Letter re Wheeler River Project and Next Steps
Attachments: [E-DOCS-#6490509-v1-2021-02-15_-_Letter_-_CNSC_to_\[REDACTED\]_-_Restart_of_EA_activities.PDF](#)
Sent: 2021-02-15 10:15:00 AM

Follow Up Flag: Follow up

Flag Status: Flagged

Dear [REDACTED]d,

The purpose of the attached letter is to provide you an update on the status of the proposed Wheeler project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including the potential for consultation with the CNSC.

I remain available for any questions or comments by phone or email,

Best regards
Marcelle Phaneuf

Marcelle Phaneuf, M.Sc

Environmental Assessment Specialist, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 343-551-4196 ** NEW**

Spécialiste en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 343-551-4196 ** NOUVEAU**



February 15th, 2021

e-Doc: #6481520

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Notice of restart of activities on the Federal Environmental Assessment (EA) for Denison Mines' Proposed Wheeler River Project

Dear [REDACTED]

The purpose of this letter is to notify you that Denison Mines Corp (Denison) has notified the CNSC that they have resumed Environmental Assessment (EA) activities related to the Wheeler River Project (the Project) on January 01, 2021, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The CNSC has also received a revised project description from Denison Mines Corp. for the Wheeler River Project (<https://www.ceaa-acee.gc.ca/050/evaluations/proj/80178>). The revisions do not constitute material changes to the project and therefore public consultation is not required.

Current Status and Next Steps

The next step in the EA process will be the submission by Denison of a draft Environmental Impact Statement (EIS). Denison has indicated that this submission can be anticipated in early 2022.

As part of the EA process, [REDACTED] will have the opportunity to provide comments on Denison's draft EIS once it is submitted as part of the public review period. In later steps of the process, [REDACTED] will also have the opportunity to comment on CNSC staff's Environmental Assessment (EA) Report and Commission Member Document (CMD), and to submit comments to the Commission for an eventual EA Commission hearing as a written intervention and/or oral presentation.

In addition, CNSC staff will continue to reach out with offers to meet and conduct additional consultation and engagement activities throughout the EA process with [REDACTED]. As an Indigenous group with interest in this project, the CNSC is interested in hearing any views your Nation may have with respect to the project. The CNSC encourages your Nation, throughout the EA process and including but not limited to the review and comment periods, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so

- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns;
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures; and
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project.

In addition, the CNSC will be making funding available to support [REDACTED] participation throughout the EA process through the CNSC's Participant Funding Program (PFP).

The first phase of PFP, for the review of the draft EIS, will be announced by May of 2021. The CNSC will be offering funding, to be disbursed among all eligible applicants, to help in the review of the draft EIS. A second phase of PFP will be announced at a later date, to help in the review of the EA report and CMD, and to prepare an intervention for an EA hearing. Please note that should additional funding be needed by [REDACTED], beyond the funding that will be awarded through these PFP opportunities, requests or applications for additional funding will be considered by the CNSC on a case-by-case basis.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process for the Participant Funding Program: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>. If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsf.pfp.ccsn@canada.ca.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact me by phone at 343-551-4196 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,

Marcelle Phaneuf

Marcelle Phaneuf
Environmental Assessment Officer, Environmental Assessment Division
Canadian Nuclear Safety Commission

c.c.:

[REDACTED]
P. Fundarek, N. Kwamena, C. Cattrysse, S. Akhter, R. Froess, A. Zenobi, CNSC
A. Sadik, B. England, SEASB

From: [Froess, Ryan \(CNSC/CCSN\)](#)
To: [REDACTED]
Cc: [Phaneuf, Marcelle \(CNSC/CCSN\)](#); [Adam Zenobi \(CNSC/CCSN\)](#) (adam.zenobi@canada.ca); [Adam Levine \(CNSC/CCSN\)](#) (adam.levine@canada.ca);
Subject: Denison Wheeler River Project and Next Steps
Sent: 2021-03-26 4:12:00 PM

Good afternoon [REDACTED],

I am following up on a letter that was sent by the Canadian Nuclear Safety Commission (CNSC) to [REDACTED] on February 15th, 2021, regarding the Wheeler River Project (the Project) proposed by Denison Mines Corp, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The purpose of the letter was to inform [REDACTED] that Denison had notified the CNSC that they had resumed Environmental Assessment (EA) activities related to the Project.

I am reaching out on behalf of myself and Marcelle Phaneuf (EA specialist responsible for the proposed project at the CNSC). The CNSC would like to meet with [REDACTED] to provide an update on the status of the proposed Project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including consultation and engagement activities with [REDACTED] by the CNSC throughout the EA process. As an Indigenous Nation with direct interest in this project, the CNSC is interested in hearing any views you may have with respect to the project including but not limited too the following:

- any adverse impacts the project may have on potential and/or established Indigenous rights;
- how specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated;
- opportunities to provide Indigenous knowledge to support determination of potential impacts and potential mitigation measures;
- advise the CNSC of how the [REDACTED] would like to be consulted by the Crown as part of the regulatory review process for this project (e.g. opportunity to work together to develop a Terms of Reference or plan for consultation for the Wheeler River Project EA and regulatory process).

In addition, as outlined in the letter the CNSC will be making funding available to support [REDACTED] participation throughout the EA process through the CNSC's Participant Funding Program (PFP). The first phase of PFP, for the review of the draft EIS, will be announced by late Spring of 2021.

The CNSC is committed to building meaningful and long-term relationships with [REDACTED]. We would like to propose to set up a meeting with [REDACTED] in the spring of 2021 to discuss next steps in the EA and consultation process, opportunities to collaborate early on in the EA process, and understand how the project may impact [REDACTED] rights and interests.

We (are flexible and are looking forward to meeting virtually) on dates that work best for [REDACTED].

Thank you,

Ryan Froess
Senior Policy Advisor, Policy, Aboriginal, and International Relations Division
Canadian Nuclear Safety Commission
ryan.froess@canada.ca | Cell: 306-914-7892

Conseiller Principal des Politiques, Division des Politiques et des Affaires autochtones et Internationales
Commission Canadienne de Sûreté Nucléaire
ryan.froess@canada.ca | Cell: 306-914-7892

Boser, Sydney

From: Froess, Ryan (CNSC/CCSN) <ryan.froess@canada.ca>
Sent: April 12, 2021 2:24 PM
To: [REDACTED]
Cc: Phaneuf, Marcelle (CNSC/CCSN); Adam Zenobi (CNSC/CCSN) (adam.zenobi@canada.ca)
Subject: Denison Wheeler River Project and Next Steps

Categories: Denison

Good afternoon [REDACTED]

I am following up on a letter that was sent by the Canadian Nuclear Safety Commission (CNSC) to [REDACTED] on February 15th, 2021, regarding the Wheeler River Project (the Project) proposed by Denison Mines Corp, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The purpose of the letter was to inform [REDACTED] that Denison had notified the CNSC that they had resumed Environmental Assessment (EA) activities related to the Project.

I am reaching out on behalf of myself and Marcelle Phaneuf (EA specialist responsible for the proposed project at the CNSC). As an Indigenous Nation with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project including but not limited too the following:

- any potential adverse impacts the project may have on your Nation's potential and/or established Indigenous and/or treaty rights;
- how specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated;
- advise the CNSC of how your Nation would like to be consulted by the Crown as part of the regulatory review process for the Wheeler River project.

In addition, as outlined in the letter the CNSC will be making funding available to support Indigenous and Public participation throughout the EA process through the CNSC's Participant Funding Program (PFP). The first phase of PFP, for the review of the draft EIS, will be announced by late Spring of 2021.

We are available to meet and discuss the EA process for the Wheeler River Project. Do not hesitate to contact myself or Marcelle by phone or email at our contact information below or to learn more about the project.

Thank you,

Ryan Froess
Senior Policy Advisor, Policy, Aboriginal, and International Relations Division
Canadian Nuclear Safety Commission
ryan.froess@canada.ca | Cell: 306-914-7892

Marcelle Phaneuf, M.Sc
Environmental Assessment Specialist, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 343-551-4196

From: [Froess, Ryan](#)
Cc: [Adam Zenobi \(adam.zenobi@cnsccsn.gc.ca\)](#)
[kevin.mercredi@outlook.com](#); [Chief Coreen Sayazie](#); [b-tsannie@hotmail.com](#); [Shea Shirley](#); [Garrett Schmidt](#); [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#); [jerry.bernard@erfn.net](#); [Mark Calette](#); [slandriecrossland@mns.work](#); [s.nickolet@mns.work](#); [Walter Smith](#); [Billie Jo Natomagan](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [tcooksearson@lrib.ca](#); [gchristiansen@lrib.ca](#); [lbnouf@mns.work](#); [tex.mns@sasktel.net](#); [Eric Sylvestre](#); [chief1@birchnarrows.ca](#); [norma.catarat@outlook.com](#); [Elmercampbell35@gmail.com](#); [glenmccallum](#);
Bcc:
Subject: CNSC Participant Funding Notice - Denison Mines Draft EIS
Sent: 2022-01-10 3:33:00 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Funding is available to assist Indigenous peoples, members of the public and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Denison is proposing to develop an in situ recovery uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit a completed participant funding application is March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/ptp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

For questions about this specific funding opportunity, please contact:

Mr. Adam Zenobi
Participant Funding Program Administrator
613-415-2814
ptp@cnsccsn.gc.ca

Thanks,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnsccsn.gc.ca | Cell: 306-914-7892

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Follow the CNSC on LinkedIn: <https://www.linkedin.com/company/cnsccsn/life>

If you experience any difficulties in accessing the CNSC website, please send an email to cnsccsn.info@cnsccsn.gc.ca

To unsubscribe, send an email to cnsccsn.info@cnsccsn.gc.ca

From: [Froess, Ryan](#)
To: [Way, Jessica](#)
Subject: FW: CNSC Participant Funding Notice - Denison Mines Draft EIS
Sent: 2022-03-10 5:07:12 PM

FYI sent to these Nations and communities.

kevin.mercredi@outlook.com; Chief Coreen Sayazie <csayazie@hotmail.com>; b-tsannie@hotmail.com; Shea Shirley <shea.shirley@yathinene.com>; Garrett Schmidt <garrett.schmidt@yathinene.com>; Cheyenna Campbell (cheyenna.campbell@desnedhe.com); jerry.bernard@erfn.net; Mark Calette <mcalette@mns.work>; slandriecrossland@mns.work; s.nickolet@mns.work; Walter Smith <wsmith@kineepik.ca>; Billie Jo Natomagan <bnatomagan@kineepik.ca>; jtsanniejr@pagc.net; rmcleod@pagc.net; tcooksearson@llrib.ca; gchristiansen@llrib.ca; lburnouf@mns.work; tex.mns@sasktel.net; Eric Sylvestre <eric.sylvestre@birchnarrows.ca>; chief1@birchnarrows.ca; norma.catarat@outlook.com; Elmercampbell35@gmail.com; glenmccallum glenmccallum@mns.work

From: Froess, Ryan
Sent: March 9, 2022 4:12 PM
Cc: Adam Zenobi (adam.zenobi@cnsccsn.gc.ca) <adam.zenobi@cnsccsn.gc.ca>
Subject: RE: CNSC Participant Funding Notice - Denison Mines Draft EIS

Good afternoon,

This is a reminder that funding is available to assist Indigenous Nations and communities, members of the public, and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit this funding application is due March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/pfp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

If you have any questions on the application **please do not hesitate to reach out** to myself by phone or email and or for specific questions please feel free to contact:

Adam Zenobi
Participant Funding Program Administrator
613-415-2814
pfp@cnsccsn.gc.ca

Thanks you,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnsccsn.gc.ca | Cell: 306-914-7892

From: Froess, Ryan
Sent: January 10, 2022 2:33 PM
Cc: Adam Zenobi (adam.zenobi@cnsccsn.gc.ca) <adam.zenobi@cnsccsn.gc.ca>
Subject: CNSC Participant Funding Notice - Denison Mines Draft EIS

Good afternoon,

Funding is available to assist Indigenous peoples, members of the public and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Denison is proposing to develop an in situ recovery uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit a completed participant funding application is March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/pfp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

For questions about this specific funding opportunity, please contact:

Mr. Adam Zenobi
Participant Funding Program Administrator
613-415-2814
pfp@cnscccsn.gc.ca

Thanks,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892

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Follow the CNSC on Facebook: <http://www.facebook.com/CanadianNuclearSafetyCommission>

Follow the CNSC on LinkedIn: <https://www.linkedin.com/company/cnscccsn/life>

If you experience any difficulties in accessing the CNSC website, please send an email to cnscccsn.info@cnscccsn.gc.ca

To unsubscribe, send an email to cnscccsn.info@cnscccsn.gc.ca

From: [Way, Jessica](#)
To: [REDACTED]
Cc: [Kwamena, Nana-Owusua](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Akhter, Salman](#); [Way, Jessica](#); [Yen, Wish](#); [Levine, Adam](#); [Froess, Ryan](#); [Aimann Sadik](#); [England, Brianne](#) ENV;
Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application
Attachments: [6814097-v1A-2022_Wheeler_River_Field_Test_-_Notification_Letter_to \[REDACTED\].pdf](#)
Sent: 2022-06-17 4:37:42 PM

Dear [REDACTED]

The purpose of the attached letter is to notify you of an application from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

Similar letters will also be sent to the attention of the [REDACTED]
[REDACTED]

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,
Jes Way

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213



June 17, 2022

e-Doc: 6814097

[REDACTED]
[REDACTED]
[REDACTED]

Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Dear [REDACTED]

This letter is to inform you that Denison Mines Corp. (Denison) has submitted an application to the Canadian Nuclear Safety Commission (CNSC) for a Nuclear Substances and Radiation Devices licence, for the Wheeler River Exploration Project in northern Saskatchewan. This licence application is for the temporary storage and use of natural uranium in laboratory studies, for a 60 day feasibility field test that Denison are planning to conduct in August 2022. Following completion of the test, the recovered material will be temporarily stored above ground.

Proposed Wheeler River Project

The Wheeler River Property is located in the eastern part of the Athabasca Basin, approximately 4 km west of Highway 914 and 35 km north of the Key Lake mill. Denison has proposed a project to construct, operate, and decommission an in-situ uranium mine. An [Environmental Assessment \(EA\) under the Canadian Environmental Assessment Act of 2012](#) (CEAA 2012) has been underway since 2019 for the proposed Wheeler River Project, led by CNSC staff. Concurrently, the Government of Saskatchewan is also leading a [provincial EA](#).

Field work at the site has been occurring since 2007, with advanced drilling and testing occurring since 2019. These activities have had continual oversight from the Saskatchewan Ministry of Environment, and the CNSC as necessary.

It is important to note that the proposed feasibility field test is not within the scope of the CEAA 2012 EA, as this is a distinct project. The field test could therefore proceed prior to an EA decision.

Feasibility Field Test

Through the feasibility field test, Denison intends to validate previous testing and determine the feasibility of the proposed in-situ recovery mining methodology at the Wheeler River Property. This test requires no new clearing of land or new drilling, only the construction of limited temporary surface facilities.

During the planned test, mineralized material will be removed from the ground through a process that includes injecting a solution into test wells, separating liquids from solids, and collecting the resulting materials for further analysis. These materials are expected to contain elevated levels

natural uranium, and samples will be analysed for general chemistry at the on-site chemical laboratory and later transported to the Saskatchewan Research Council in Saskatoon for further analysis. Once all analysis is complete, materials will be placed in above ground storage tanks, and will remain the property of the Crown, under the oversight of the Saskatchewan Ministry of Environment (SMOE).

In March 2022 an application was also submitted to the SMOE, as Denison requires a permit to construct and operate a pollutant control facility prior to conducting the proposed feasibility field test. This permit is required under Saskatchewan's *Mineral Industry Environmental Protection Regulations, 1996*, and the application remains under provincial review.

Licensing Process

Unlike Class I nuclear facilities and uranium mines and mills, licences for use of Nuclear Substances and Radiation Devices are issued by a Designated Officer (DO) of the CNSC. A DO is a member of CNSC staff who has been designated specific powers under the *Nuclear Safety and Control Act* with respect to licensing and compliance. Like the Commission, DOs demonstrate independence and procedural fairness. With their extensive knowledge, regulatory training and operational experience, DOs are well qualified to make decisions on behalf of the Commission. DO decisions are based on rigorous reviews performed by CNSC staff, who verify that the applicant would meet regulatory requirements. After completing their evaluations, CNSC staff prepare DO documents – which include technical and regulatory information, conclusions and recommendations – to help inform DO licensing decisions.

Nuclear Substances and Radiation Devices licences have a service standard of 80 business days for a DO decision, from the date a complete application has been received. DOs will only grant the licence if they are satisfied that the authorized activities do not pose a risk to health, safety, security and the environment.

As an Indigenous Nation and/or community with a potential interest in Denison's licence application, the CNSC is interested in hearing any views or receiving any additional information you may have with respect to Denison's application to the CNSC for a Nuclear Substances and Radiation Devices Licence, for this proposed project.

Further Information

CNSC staff will continue to keep you apprised of the status of this licence application, DO decision and next steps, including more information on the CNSC's licensing requirements and oversight activities should a licence be granted to Denison for the proposed field test.

If you would like to meet to discuss in further detail, and have any questions relating to this licence application or the ongoing EA for the Wheeler River Project, please contact:

- Jes Way, Environmental Assessment Officer, Wheeler River EA Lead
Email: jessica.way@cnscccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous and Stakeholder Relations Division
Email: ryan.froess@cnscccsn.gc.ca

If you wish to receive e-mail notifications related to the EA process and other updates on this licensing process, please let us know and we can add you to the project distribution list.

You may also sign-up to the CNSC mailing list to receive notifications CNSC website is updated, including notices for hearings, meetings and Participant Funding Program opportunities. Visit the following link and choose the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

Sincerely,



Nana Kwamena

Director, Environmental Assessment Division
Canadian Nuclear Safety Commission
E-mail: nana-owusua.kwamena@cnsccsn.gc.ca

c.c.: S. Faille, N. Babcock, P. Burton, S. Akhter, J. Way, W. Yen, A. Levine, R.
Froess, CNSC
A. Sadik, B. England, SEASB

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

From: [Way, Jessica](#)
To: [REDACTED]
Cc: [Kwamena, Nana-Owusua](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Akhter, Salman](#); [Yen, Wish](#); [Levine, Adam](#); [Froess, Ryan](#); [Aimann Sadik](#); [England, Brianne ENV](#); [REDACTED]
Bcc: [Way, Jessica](#)
Subject: Notice of Nuclear Substances and Radiation Devices Licence issued to Denison Mines Corp.
Sent: 2022-08-05 11:34:00 AM

Dear [REDACTED]

In follow up to our email and letter from June 17th, this email is to inform you that a Nuclear Substances and Radiation Devices licence has now been granted to Denison Mines Corp. (Denison) by a CNSC Designated Officer.

Denison applied for a Nuclear Substances and Radiation licence for the Wheeler River Exploration Project in northern Saskatchewan in order to complete a feasibility field test of the proposed in-situ recovery mining methodology at the Wheeler River Property. This licence, which is valid from August 3, 2022 to December 31, 2023, authorizes Denison to temporarily store and use natural uranium in laboratory studies above ground.

As always, we remain available to discuss in more detail. To obtain more detailed information or for any questions, please contact Jes Way at jessica.way@cnscccsn.gc.ca or Ryan Froess at ryan.froess@cnscccsn.gc.ca.

Sincerely,
Jes

From: Way, Jessica
Sent: Friday, June 17, 2022 4:39 PM
To: [REDACTED]
Cc: Kwamena, Nana-Owusua <nana-owusua.kwamena@cnscccsn.gc.ca>; Faille, Sylvain <sylvain.faille@cnscccsn.gc.ca>; Babcock, Neil <neil.babcock@cnscccsn.gc.ca>; Burton, Patrick <patrick.burton@cnscccsn.gc.ca>; Akhter, Salman <salman.akhter@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Levine, Adam <adam.levine@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Aimann Sadik <aimann.sadik@gov.sk.ca>; England, Brianne ENV <brianne.england@gov.sk.ca>; [REDACTED]
Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Dear [REDACTED]

The purpose of the attached letter is to notify you of an application from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,
Jes Way

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
[Brent Laroque](#); [Shannon Landrie-Crossland](#); [Way, Jessica](#); [cheyenna.campbell@desnedhe.com](#); [jerry.bernard@erfn.net](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bнатomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [mcalette@mns.work](#); [s.nickolet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#);
Bcc: [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [chief1@birchnarrows.ca](#); [Froess, Ryan](#); [DeCoste, Laura](#); [Yen, Wish](#); [Way, Jessica](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [claire_larock@hotmail.com](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [tcooksearson@lrib.ca](#); [jtsanniejr@pagc.net](#); [gchristiansen@lrib.ca](#); [Bruce Hanbidge](#); [Lo, Tiffany](#); [Janna Switzer](#); [Carolanne Inglis-McQuay](#); [Aimann Sadik \(aimann.sadik@gov.sk.ca\)](#); [Frigault, Nicole](#);
Subject: Upcoming Webinar - Rook I and Wheeler River Projects
Sent: 2022-08-24 4:42:00 PM

Good afternoon,

On September 13th from 10am to 11am CST (noon to 1pm EST), CNSC will be hosting a webinar on the CNSC regulatory review process for NexGen Energy Ltd's proposed Rook I project and Denison Mine's proposed Wheeler River project.

The webinar will cover:

- CNSC's regulatory review process for licensing and environmental assessments
- an update on the status of the Rook I and Wheeler River projects

There will be an opportunity for questions, and if you are unable to attend the webinar will also be recorded.

To register, please visit: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/meet-the-nuclear-regulator/webinar-NexGen-Rook-I-and-Denison-Wheeler-River-Projects.cfm>. More information can also be found at: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/meet-the-nuclear-regulator/index.cfm>.

Feel free to share with your distribution groups or anyone else that might be interested. If you have any questions, please don't hesitate to contact us.

Sincerely,

Jes Way

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#); [Cheyenna Hunt](#); [jerry.bernard@erfn.net](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bnatomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [Brent Laroque](#); [Shannon Landrie-Crossland](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [chief1@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [claire_larock@hotmail.com](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [tcooksearson@llrib.ca](#); [jtsanniejr@pagc.net](#); [gchristiansen@llrib.ca](#); [cheyenna.hunt@desnedhe.com](#); [karenbird@pbcn.ca](#);
Bcc:
Subject: Wheeler River Project EIS Received - Conformity Review Underway
Sent: 2022-10-24 11:28:00 AM

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213



**Directorate of Nuclear Cycle
And Facilities Regulation**

**File No. 7.03.02
e-Doc 6875724**

November 10, 2022

Chief Jerry Bernard
English River First Nation
P.O. Box 30
Patuanak, SK S0M 2H0

Mr. Glenn McCallum
President
Metis Nation Saskatchewan and Northern Region 11
Suite 201, 208-19th Street West
Saskatoon, SK S7M 5X8

Mr. Mike Natomagan
President
Kineepik Métis Local #9
P. O. Box 166
Pinehouse, SK S0J 2B0

Mr. Garrett Schmidt
Executive Director
Ya'thi Néné Lands and Resource Office
100-335 Packham Ave
Saskatoon, SK S7N 4S1

Subject: CNSC Staff's Position on the United Nations Declaration on the Rights of Indigenous Peoples

Dear Chief Bernard, Mr. McCallum, Mr. Natomagan, and Mr. Schmidt,

During the September 15, 2022, engagement session held in Saskatoon for the 2021 Uranium Mines and Mills Regulatory Oversight Report, Canadian Nuclear Safety Commission¹ staff received a request for CNSC staff's views regarding the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP), and its interplay with the CNSC's work.

On June 21, 2021, the *United Nations Declaration on the Rights of Indigenous Peoples Act* (UNDA) came into force. This Act provides a roadmap for the Government of Canada and Indigenous peoples to work together to implement the Declaration based on lasting reconciliation, healing, and cooperative relations.

One of three key obligations under the UNDA, at section 5, is the development by the Government of Canada of an action plan to achieve the objectives of the Declaration in consultation and cooperation with Indigenous peoples. The CNSC has been coordinating and cooperating with the federal departments and agencies on the Government of Canada's approach to implementing UNDA, including contributing to the [UNDA annual progress report](#), as required by section 7 of the Act. Pending the draft action, the CNSC, as an agent of the Crown, is taking an approach to consultation and engagement with Indigenous peoples which is mindful of, and consistent with, the principles articulated in UNDRIP.

¹ The Canadian Nuclear Safety Commission is an independent federal government agency. When referred to as the "CNSC", this is a reference to the organization and its staff in general, whereas the "Commission" is used when referring to the tribunal component.

CNSC staff make an effort to consult and engage with Indigenous Nations and communities as part of regulatory processes, so that there is an opportunity to address concerns and incorporate the perspectives of Indigenous Nations and communities into CNSC staff's work, including into our recommendations to the Commission when appropriate. CNSC staff's consultation and engagement efforts can include meeting directly with Indigenous Nations and communities on a specific topic, general community-based outreach sessions where multiple topics are discussed, facilitated site visits, funding support through the CNSC's Participant Funding Program (PFP), collaboratively working with Indigenous Nations and communities and licensees/project proponents to find solutions to concerns raised, including issues to potential impacts to the exercise of Indigenous or treaty rights, and working towards finding consensus with affected Nations and communities. CNSC staff collaborate with Indigenous Nations and communities to ensure that this information is shared with proponents and submitted to the Commission to help inform the decision-making process.

CNSC staff have used this approach in regards to Cameco's application for longer licence terms for the McArthur River mine, the Key Lake mill, and the Rabbit Lake mine and mill. CNSC staff have sought to discuss topics such as longer licensing with Indigenous Nations and communities before CNSC staff recommendations to the Commission are final, so that we can ensure we are aware of the perspectives of Indigenous Nations and communities, and can consider these perspectives as part of formulating our recommendations.

While CNSC staff's position on longer licensing is not yet final, no significant technical barriers to maintaining effective regulatory oversight over longer licence terms have been identified. At the same time, CNSC staff are eager to work toward making sure that the relationship-building and reconciliation efforts continue, regardless of licence term decisions that are made by the Commission. In our engagement and consultation to date, CNSC staff have heard from Indigenous Nations and communities that there is opposition and concerns related to the request for longer licence terms, and concerns with the idea of longer licence terms in general. CNSC staff will submit this information to the Commission, so that the Commission will be informed and can appropriately question Cameco, CNSC staff, Indigenous Nations, communities and organizations and other intervenors on this topic.

CNSC staff are planning additional engagement in November of this year, in support of Cameco's licence renewal requests for the operations at McArthur River, Key Lake and Rabbit Lake. This will be a good opportunity to further discuss concerns and look for ways to address them and reach consensus, where possible. Any other topics of interest can also be discussed at that time. CNSC staff encourage your Nations to participate in that engagement, and to intervene in the June 7 and 8, 2023 public Commission hearing on Cameco's requested licence renewals, so that the Commission can directly hear your position. The [notices for Participant Funding](#) have been sent and CNSC staff encourage all interested parties to apply to help support their interventions. The Commission takes into account all of the information brought forward during its proceedings, and as an Agent of the Crown needs to ensure that the honour of the Crown is upheld in relation to its decisions.

CNSC staff look forward to discussing Cameco's licence renewal applications further and hope that you will also take the opportunity to intervene in this matter.

Best regards,



CNSC Staffs Position
on the United Nation



Patrick Burton
Director
Uranium Mines and Mills Division
613-301-0562
patrick.burton@cnscccsn.gc.ca

Clare Cattrysse
Director
Indigenous and Stakeholder Relations Division
613-818-4541
clare.cattrysse@cnscccsn.gc.ca

c.c: Cheyenna Hunt – English River First Nation
Mary Denechezhe – Hatchet Lake First Nation
Brent Laroque – Métis Nation of Saskatchewan
Walter Smith – Kineepik Métis Local

From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#);
[Cheyenna Hunt](#); 'jerry.bernard@erfn.net'; 'nvp.mike@sasktel.net'; 'wsmith@kineepik.ca';
'bnatomagan@kineepik.ca'; 'glenmccallum@mns.work'; 'Brent Laroque'; 'Shannon Landrie-Crossland';
'garrett.schmidt@yathinene.com'; 'shea.shirley@yathinene.com'; 'kevin.mercredi@outlook.com'; b-
tsannie@hotmail.com; csayazie@hotmail.com; d.powder.nhsr@sasktel.net; 'd.classen@sasktel.net';
Bcc: 'chief1@birchnarrows.ca'; 'norma.catarat@brdn.ca'; 'receptionist@mltc.net';
'claire_larock@hotmail.com'; 'karenbird@pbcn.ca'; 'tmerasty@pbcn.ca'; 'bmerasty@pbcn.ca';
'cooksearson@lrib.ca'; 'jtsanniejr@pagc.net'; 'gchristiansen@lrib.ca'; 'cheyenna.hunt@desnedhe.com';
karenbird@pbcn.ca;
Subject: RE: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins
Sent: 2022-11-21 3:42:00 PM

Sorry all- Correction, the deadline for comments is **February 18th 2023**.

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Sent: Monday, November 21, 2022 3:34 PM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

Hi Everyone,

In update to my email below, Canadian Nuclear Safety Commission (CNSC) staff undertook a conformity review of Denison's draft environmental impact statement (EIS) submission, and we have now deemed the submission complete. The letter to Denison has been posted to the Canadian Impact Assessment Registry (the Registry), as has the draft EIS and executive summary, along with all appendices and technical support documents.

The CNSC is now seeking comments during a 90-day public comment period on Denison's draft EIS, for the proposed Wheeler River Project. For the purposes of this comment period, the draft EIS and supporting documents can be accessed by visiting [All Records](#) for the project. The EIS can also be found under Key Documents, located on the main Registry page for the [Wheeler River Project](#), as well as here: <https://iaac-aeic.gc.ca/050/evaluations/document/145552>

The draft EIS provides an analysis of the project's potential environmental effects and measures to mitigate those potential impacts. The public comment period gives Indigenous nations and communities, members of the public, and government departments and agencies an opportunity to submit their views in writing to the CNSC on the adequacy of the information presented in the EIS, as measured against the [Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012](#) (the Guidelines), and on the technical merit of the information presented. The Guidelines provide direction to the proponent and identify the information that is required in the EIS.

Written comments must be submitted by **February 18, 2023** to:

Jes Way
Environmental Assessment Officer
Email: wheelerRiver@cnscccsn.gc.ca

All comments on the draft EIS will be posted on the Registry in the language in which they were received. If you have any questions about this or anything else, please don't hesitate to reach out to our team.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Sent: Monday, October 24, 2022 11:28 AM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Received - Conformity Review Underway

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If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#); [Way, Jessica](#); [Way, Jessica](#); [Cheyenna Hunt](#); [jerry.bernard@erfn.net](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bnatomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [Brent Laroque](#); [Shannon Landrie-Crossland](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [chief1@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [claire_larock@hotmail.com](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [tcooksearson@llrib.ca](#); [jtsanniejr@pagc.net](#); [gchristiansen@llrib.ca](#); [cheyenna.hunt@desnedhe.com](#); [karenbird@pbcn.ca](#); [Kwamena, Nana-Owusua](#);
Bcc:
Subject: Reminder: Wheeler River Project Public and Indigenous Comment Period
Sent: 2023-01-18 7:34:00 PM

Hi Everyone,

Just sending a reminder that if you would like to provide comments on the Wheeler River Environmental Impact Statement, they are due on [February 18th, 2023](#). Please feel free to share with anyone that would be interested in providing a submission during this comment period.

If you have any questions about the information in these emails, please don't hesitate to contact me at the information below.

Thanks,

Jess Way
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsc-ccsn.gc.ca | Tel: 343-540-6213

From: Way, Jessica
Sent: Monday, November 21, 2022 3:42 PM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnsc-ccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnsc-ccsn.gc.ca>; Yen, Wish <wish.yen@cnsc-ccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnsc-ccsn.gc.ca>
Subject: RE: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

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Jes Way
Environmental Assessment Officer
Email: wheelerriver@cnscccsn.gc.ca

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Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Sent: Monday, October 24, 2022 11:28 AM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Received - Conformity Review Underway

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

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If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)
'cheyenna.hunt@desnedhe.com'; 'jerry.bernard@erfn.net'; 'nvp.mike@sasktel.net';
'wsmith@kineepik.ca'; 'bнатомagan@kineepik.ca'; 'glenmccallum@mns.work'; 'blaroque@mns.work';
'Shannon.Landrie-Crossland'; 'rsmith@mns.work'; 'sfladager@mns.work'; 'aspriggs@mns.work';
'mbrunet@mns.work'; 'garrett.schmidt@yathinene.com'; 'shea.shirley@yathinene.com';
'dana.kellett@yathinene.com'; 'bruce.hanbidge@yathinene.com'; 'kevin.mercredi@outlook.com'; 'b-tsannie@hotmail.com'; 'csayazie@hotmail.com'; 'd.powder.nhsr@sasktel.net'; 'd.classen@sasktel.net';
'claire_larock@hotmail.com'; 'chief1@birchnarrows.ca'; 'andrew@tamarackenvironmental.ca';
Bcc: 'trevor.moberly@birchnarrows.ca'; 'robert.sylvester@birchnarrows.ca'; 'kimsylvestre@birchnarrows.ca';
'conrad.sylvester@birchnarrows.ca'; 'terrie.campbell@birchnarrows.ca';
'douglas.barks@birchnarrows.ca'; 'norma.catarat@brdn.ca'; 'receptionist@mltc.net';
'karenbird@pbcn.ca'; 'tmerasty@pbcn.ca'; 'bmerasty@pbcn.ca'; 'patti@mccunn-miller.com';
'cbeatty@pbcn.ca'; 'tcooksearson@lirib.ca'; 'ty.roberts@lirib.ca'; 'ashley.carlson@lirib.ca';
'gchristiansen@lirib.ca'; 'jtsanniejr@pagc.net'; 'rmcleod@pagc.net'; 'mellissa.winfield-lesk@hatch.com';
Heidi Klein; Janna Switzer; Carolanne Inglis-McQuay; Manickum, Katherine; Khanan, Rabya; 'Steven
[Coupland](#)'; [Way, Jessica](#);

Subject: Wheeler River Project Bulletin - April 2023

Attachments: [Wheeler River Project Bulletin - English PDF.pdf](#)

Sent: 2023-04-26 1:55:00 PM

To all participants of the Wheeler River regulatory review process,

CNSC staff will be providing regular updates to all those who have participated and/or expressed interest in the regulatory review process for the proposed Wheeler River Project, in the form of project bulletins.

This first bulletin (dated April 2023) is attached to this email and provides a brief update on the status of the project, as well as next steps. This will soon be posted to the CNSC website in the form of a "Feature Article", in both English and French.

Please ensure you are signed up to receive notifications and additional information regarding future correspondence from the CNSC: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/new-subscription.cfm>

If you would prefer not to receive these updates, please reply to this email to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](http://WheelerRiverProject(iaac-aeic.gc.ca))

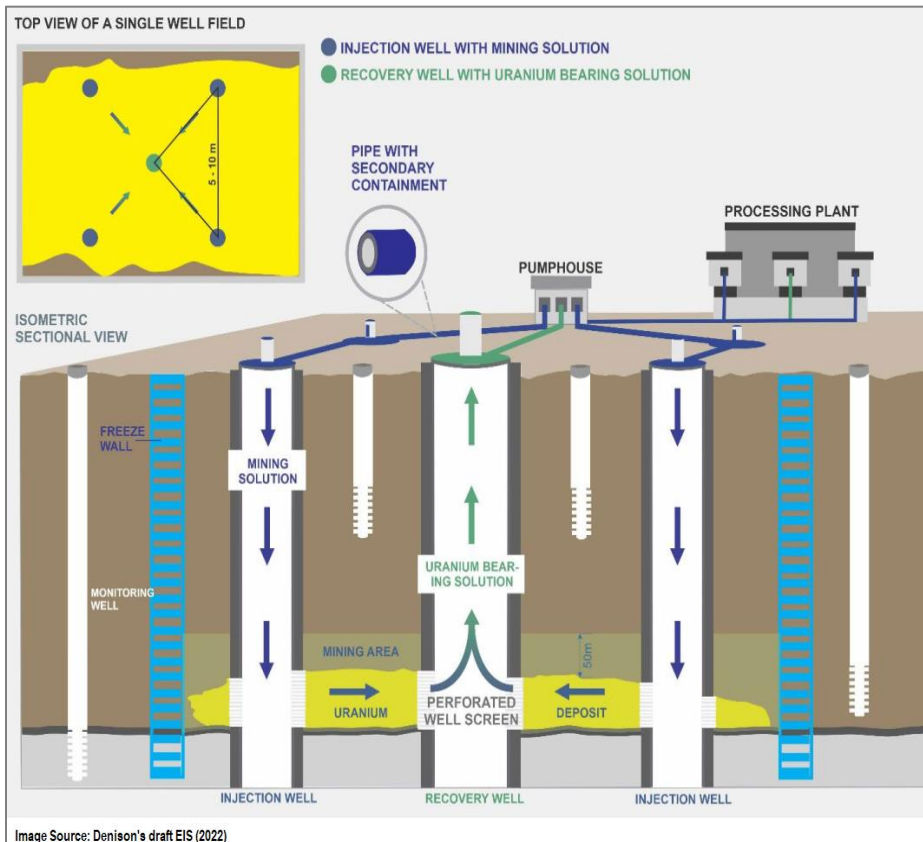
April 2023

Denison Mines Corp. Wheeler River Project Bulletin



PROJECT OVERVIEW

Denison Mines Corp. (Denison) is proposing to develop an *in situ* recovery uranium mining and processing plant - [the Wheeler River Project](#) - in the Athabasca Basin in Saskatchewan, approximately 600 kilometres north of the City of Saskatoon. The proposed project is located within Treaty 10 territory, the homeland of the Métis, and within the traditional territories of the Dene, Cree, and Métis peoples. It is also located within the Northern Administration District of Saskatchewan.



Denison have proposed an *in situ* recovery method, meaning that the mining will occur *in place* and from above ground, without the need for an open pit or underground tunnels.

The proposed mining method would involve:

- 1) injecting an acidic mining solution into the ground through encased wells to dissolve uranium from the deposit
- 2) bringing the uranium-bearing mining solution back to the surface through recovery wells
- 3) transporting the mining solution to an onsite processing plant to process and extract the uranium

The mining area will be surrounded by a freeze wall to help control the movement of the mining solution underground.

The proposed Wheeler River Project would include underground and above ground components to support the mining and processing of uranium. The main components include: a camp facility; site operations centre; *in situ* recovery mining wellfield and freeze wall; freeze plants; processing plant / water treatment plant; warehousing and fuel storage facilities; power generation; waste management; an airstrip; and, additional infrastructure to support mining activities.

Denison's proposal is undergoing an [environmental assessment](#) (EA) as per the [Canadian Environmental Assessment Act, 2012](#) (CEAA 2012) by the Canadian Nuclear Safety Commission (CNSC). Denison also intends to apply for a licence to construct their facilities, which will trigger a thorough [licensing review](#) as per the [Nuclear Safety and Control Act](#). The project is also subject to a [provincial EA](#) as per the province of Saskatchewan's Environmental Assessment Act.

WHERE WE ARE NOW

In 2019, Denison submitted a project description to provide a general overview of the proposed Wheeler River project which was posted to the [Canadian Impact Assessment Registry \(reference #: 80178\)](#) (the Registry) for review. From May 31 to June 30, 2019, CNSC staff sought comments from the public and Indigenous Nations and communities on the project description and posted [CNSC staff's responses to the comments](#) to the Registry. Following the comment period on the project description, in December 2019 the Commission issued a [Record of Decision](#) for the proposed Wheeler River Project stating the EA will include the factors mandated within CEAA 2012 with no additional factors.



The [EA was temporarily suspended](#) due to COVID-19 in March 2020 at Denison's request. The project resumed in January 2021, at which point Denison provided a [revised project description](#). The revised project description proposed a new freeze wall design for a third level of containment instead of the previously proposed freeze dome. The revisions did not constitute material change to the project and additional public consultation on the revisions were not required. In May 2020, in anticipation of the submission of the draft Environmental Impact Statement (EIS) [participant funding was offered](#) to assist Indigenous Nations and communities and members of the public in the review and comment on the draft EIS.

Since 2022, Denison has been conducting a field test to assess the feasibility of the proposed *in situ* method, under a CNSC Nuclear Substances and Radiation Devices licence. This licence is valid until December 31, 2023.

In October 2022, Denison submitted a draft EIS package (see [Key Documents](#)). CNSC staff performed a [conformity review](#) of the draft EIS and found the submission has the required information to proceed with the technical review. In November 2022 two parallel reviews began: [a 90-day public and Indigenous comment period](#) and 120-day EIS technical review by the Federal and Indigenous Review Team. The [public and Indigenous comments](#) and [federal information requests](#) have been shared with Denison for review.

NEXT STEPS

Denison will be required to respond to comments on the EIS from the public and Indigenous Nations and communities, as well as provide responses to federal information requests, along with any supplementary information required. The review of Denison's responses will be an iterative process that can last as long as it takes to ensure the responses meet regulatory requirements. Once the draft EIS meets regulatory requirements, CNSC staff will proceed to the development of an EA report for consideration by the Commission. Denison will also need to meet CNSC licensing requirements described in the [Uranium Mines and Mills Regulations](#), among other requirements, in order to obtain a licence to begin construction.

Before deciding on each of the EA and construction licensing aspects of the proposed project, the Commission will hold public hearings where Indigenous Nations and communities and members of the public may [participate](#).

OUTREACH

CNSC staff will continue to engage on the Wheeler River Project and is planning future webinars and outreach events related to Denison's *in situ* mining proposal as this project progresses. Stay tuned!

Wheeler River Project Bulletin

If you have any questions or suggestions on topics or issues that you would like to see covered, please do not hesitate to contact us.

Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, ON K1P 5S9
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Email: WheelerRiver@cnsccsn.gc.ca
Website: nuclearsafety.gc.ca

From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
[cheyenna.hunt@desnedhe.com](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bнатomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blarogue@mns.work](#); [Shannon Landrie-Crossland](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [mellissa.winfield-lesk@hatch.com](#); [Heidi Klein](#); [Janna Switzer](#); [Carolanne Inglis-McQuay](#); [Steven Coupland](#); [Sorouche Mirmiran](#); [Bruce Hanbidge](#); [Yen, Wish](#); [Way, Jessica](#); [jenny.wolverine@erfn.net](#)
Bcc:
Subject: CNSC Wheeler River EA Update - Additional August 2023 Completeness Check and Next Phase of EIS Technical Review
Sent: 2023-08-31 5:48:00 PM

Hi Everyone,

This email is to provide another update on the Wheeler River Environmental Assessment (EA) Process.

On August 18, 2023, Denison Mines Corp. (Denison) re-submitted responses to information requests (IRs) for the proposed Wheeler River Environmental Impact Statement (EIS), to the Canadian Nuclear Safety Commission (CNSC). CNSC staff conducted a completeness check and determined that outstanding IRs have passed completeness and supporting submissions are sufficient to proceed to the next phase of EIS Technical Review. More information can be found in the [August 28, 2023 letter to Denison](#), and [completeness check table](#).

The 90-day technical review has since begun, and will conclude by November 27, 2023. The focus of this review will be the following documents, all posted to the Canadian Impact Assessment Registry:

- [Wheeler River Project: Denison's Responses to Information Requests from the Federal and Indigenous Review Team \(August 18, 2023\)](#)
- [Update to Indigenous Engagement Activities for the Wheeler River Project- draft EIS](#)
- [Wheeler River Project Commitments Table- draft EIS](#)

Please don't hesitate to let us know if you have any questions.

Sincerely,

Wheeler River Project Team

wheelerriver@cnsccsn.gc.ca

Environmental Review Division | Division de l'examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Yen, Wish](#); [Froess, Ryan](#); [Nickolet, Sydney](#); [Way, Jessica](#); [Gorzowski, Konrad](#); [Takala, Torin](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#);
[cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bnatomagan@kineepik.ca](#); [georges@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [slandriecrossland@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.merccredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@lrib.ca](#); [ty.roberts@lrib.ca](#); [ashley.carlson@lrib.ca](#); [gchristiansen@lrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [mellissa.winfield-lesk@hatch.com](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#);

Bcc:

Subject: Full Public and Indigenous Distro List

Attachments: [Wheeler River Project Bulletin - English.pdf](#)

Sent: 2023-12-08 2:04:00 PM

To all participants of the Wheeler River regulatory review process,

CNSC staff will be providing regular updates to all those who have participated and/or expressed interest in the regulatory review process for the proposed Wheeler River Project, in the form of project bulletins.

Please find the Winter Project Bulletin (dated December 2023) attached to this email which will provide a brief update on the status of the project, as well as next steps. This will soon be posted to the CNSC website in the form of a "Feature Article", in both English and French.

Please ensure you are signed up to receive notifications and additional information regarding future correspondence from the CNSC: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/new-subscription.cfm>.

If you would prefer not to receive these updates, please reply to this email to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)



PROJECT OVERVIEW

Denison Mines Corp. (Denison) is proposing to develop an *in situ* recovery uranium mining and processing plant - [the Wheeler River Project](#) - in the Athabasca Basin in Saskatchewan, approximately 600 kilometres north of the City of Saskatoon, and 35km by road north of the Key Lake mill. The proposed project is located within Treaty 10 territory, the homeland of the Métis, and within the traditional territories of the Dene, Cree, and Métis peoples. It is also located within the Northern Administration District of Saskatchewan.

Denison's proposed project is undergoing rigorous regulatory scrutiny by the Canadian Nuclear Safety Commission (CNSC) and must meet all safety requirements for a uranium mine and mill. Since 2019, the proposal has been undergoing an [environmental assessment](#) (EA) as per the [Canadian Environmental Assessment Act, 2012](#) (CEAA 2012). As of July 2023, Denison has submitted a licence application to prepare site and construct a mine and mill facility, and the licence application is under review as per the CNSC's [Uranium Mines and Mills Regulations](#). The project is also subject to a [provincial EA](#) as per the province of Saskatchewan's [Environmental Assessment Act](#).

PROJECT UPDATES SINCE APRIL 2023 PROJECT BULLETIN

Following the October 2022 submission of a draft environmental impact statement (EIS) package, a technical review by the federal and Indigenous review team (FIRT) concluded that the submission did not meet regulatory requirements for the EA. In a [letter dated March 20th](#), CNSC staff outlined expectations for resubmission, requesting that Denison submit responses to all [information requests \(IRs\) from the FIRT](#), along with a commitments report and an update on Indigenous engagement.

Denison submitted responses to federal IRs on July 14, 2023. CNSC staff reviewed the responses to the IRs, along with any relevant proposed revisions to the EIS and supporting technical documents and deemed the [submission incomplete on August 11, 2023](#). On August 18, 2023, Denison re-submitted the EA package, and CNSC staff deemed the [submission complete on August 29, 2023](#). The technical review of these responses has concluded and results have been posted to the [Canadian Impact Assessment Registry](#). Of 238 original IRs, 144 have been accepted and 18 follow-up IRs issued.

With regards to the licensing technical review, Denison continues to develop, submit and revise licensing documents in order to address CNSC staff's comments. Final decisions on EA and on licensing must be made via a public Commission hearing, which will welcome Indigenous and public participation. No such hearing has yet been scheduled.

NEXT STEPS

Denison will review and respond to outstanding and follow-up IRs from the technical review. Denison will re-submit an updated draft EIS to the CNSC which will kick-off another completeness check and technical review.

CNSC staff will continue to engage on the Wheeler River Project and is planning outreach events related to Denison's *in situ* mining proposal as this project progresses. Stay tuned!

DID YOU KNOW?

The CNSC launched the new [Indigenous and Stakeholder Capacity Fund](#) (ISCF) in May 2023. Building on the CNSC's successful Participant Funding Program, the ISCF supports Indigenous Nations and communities with a direct interest in nuclear activities. It can be used to build capacity and knowledge more effectively while allowing groups to participate in regulatory processes and programs.



CNSC staff preparing for outreach at the Pinehouse Elder's Gathering in June 2023.

Wheeler River Project Bulletin

If you have any questions or suggestions on topics or issues that you would like to see covered, please do not hesitate to contact us:

Email : WheelerRiver@cnscccsn.gc.ca

Project Page: <https://ceaa-acee.gc.ca/050/evaluations/proj/80178>

Canadian Nuclear Safety Commission

280 Slater Street.

P.O. Box 1046, Station B

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Telephone: 1-800-668-5284 (toll free in Canada) or 613-995-5894

Website: nuclearsafety.gc.ca

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)
[cheyenna.hunt@desnedhe.com](#); [jerry.bernard@erfn.net](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bнатомagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [Shannon Landrie-Crossland](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [mellissa.winfield-lesk@hatch.com](#); [Heidi Klein](#); [Janna Switzer](#); [Carolanne Inglis-McQuay](#); [Steven Coupland](#); [Sorouche Mirmiran](#); [Bruce Hanbidge](#); [Yen, Wish](#); [Way, Jessica](#);

Bcc:

Subject: CNSC Wheeler River EA Update - Revised EIS and Submission Package - February 2024

Sent: 2024-02-23 5:27:00 PM

Hi Everyone,

This email is to provide an update on the Wheeler River Environmental Assessment (EA) process.

On February 10, 2024, Denison Mines Corp. (Denison) submitted a revised draft EIS package for the proposed Wheeler River Project to the Canadian Nuclear Safety Commission (CNSC). CNSC staff conducted a completeness check and determined that outstanding information requests (IRs) have passed completeness and supporting submissions are adequate to proceed to the next phase of EIS Technical Review. More information can be found in the [February 21, 2024 letter to Denison](#), and [completeness check table](#).

The next phase of technical review by the Federal Indigenous Review Team (FIRT) will run from February 21, 2024 to May 20, 2024. Subject Matter experts will review the responses to IRs provided by Denison, which includes the following documents:

- [Wheeler River Project: Denison's Responses to Information Requests from the Federal and Indigenous Review Team \(February 21, 2024\)](#)
- [Wheeler River Project: Draft Environmental Impact Statement \(February 21, 2024\)](#)
- [Update to Indigenous Engagement Activities for the Wheeler River Project- draft EIS](#)
- [Wheeler River Project Commitments Table- draft EIS](#)

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Way, Jessica](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [bнатомagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [slandriecrossland@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@lrib.ca](#); [ty.roberts@lrib.ca](#); [ashley.carlson@lrib.ca](#); [gchristiansen@lrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [mellissa.winfield-lesk@hatch.com](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#); [Dennis Sherratt](#); [Yen, Wish](#); [jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [alfreddawatsare@erfn.net](#); [Noakes, Rain](#); [McKeown, Justin](#); [Nickolet, Sydney](#).

Bcc:

Subject: Wheeler River Update - Summer 2024

Attachments: [Project_Bulletin-Denison_Wheeler_River_EA-Summer 2024.pdf](#)

Sent: 2024-08-23 6:17:00 PM

Hi Everyone,

You are receiving this email because you have participated in and/or expressed interest in the regulatory review process for the proposed Wheeler River Project.

Please see that attached project bulletin for summer 2024, which provides a brief update on the status of the project, as well as next steps. This will soon be posted to the CNSC website in the form of a "Feature Article", as well as the [Canadian Impact Assessment Registry page for this project](#).

Please ensure you are signed up to receive notifications and additional information regarding future correspondence from the CNSC: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/new-subscription.cfm>

If you would prefer not to receive updates like this in the future, please reply to this email to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnsccsn.gc.ca

Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](http://WheelerRiverProject/iaac-aeic.gc.ca)



Wheeler River Project Bulletin

PROJECT OVERVIEW

Denison Mines Corp. (Denison) is proposing to develop an *in situ* recovery uranium mining and processing plant - [the Wheeler River Project](#) - in the Athabasca Basin in Saskatchewan, approximately 600 kilometres north of the City of Saskatoon, and 35km by road north of the Key Lake mill. The proposed project is located within Treaty 10 territory, the homeland of the Métis, and within the traditional territories of the Dene, Cree, and Métis peoples. It is also located within the Northern Administration District of Saskatchewan.

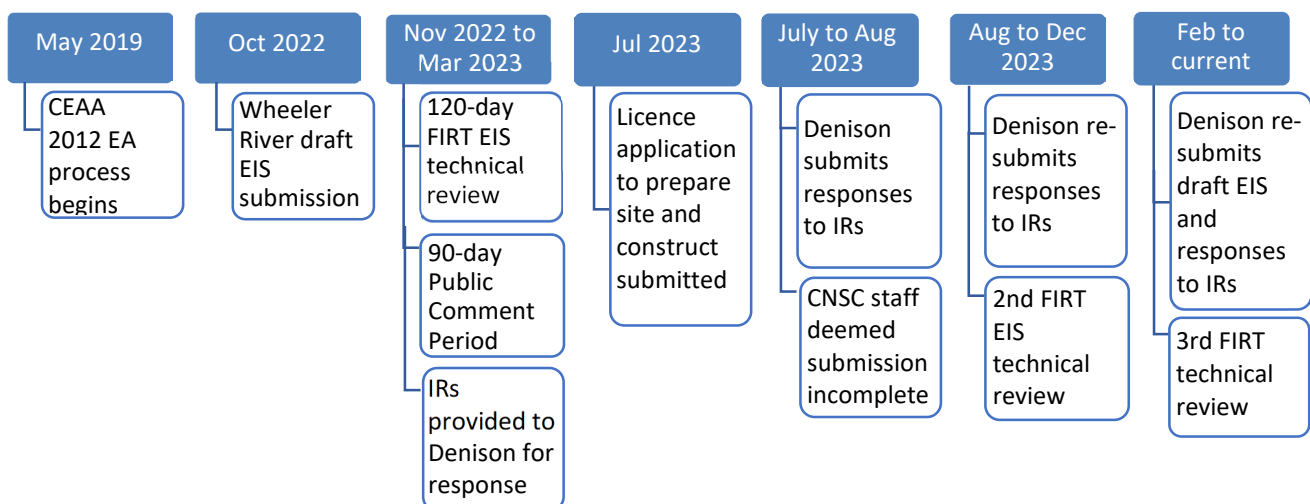
Denison's proposed project is undergoing rigorous regulatory scrutiny by the Canadian Nuclear Safety Commission (CNSC) and must meet all safety requirements for a uranium mine and mill. Since 2019, the proposal has been undergoing an [environmental assessment](#) (EA) as per the [Canadian Environmental Assessment Act, 2012](#) (CEAA, 2012). On July 2023, Denison submitted a licence application to prepare site and construct a mine and mill facility, and the licence application is under review as per the CNSC's [Uranium Mines and Mills Regulations](#). The project is also subject to a [provincial EA](#) as per the province of Saskatchewan's [Environmental Assessment Act](#).

ENVIRONMENTAL ASSESSMENT REVIEW PROCESS

Denison submitted a draft environmental impact statement (EIS) in October 2022 and the federal and Indigenous review team (FIRT) completed a technical review of the draft EIS. On [March 20, 2022](#), CNSC staff requested that Denison submit responses to all [information requests \(IRs\) from the FIRT](#), along with a commitments report and an update on Indigenous engagement.

Denison first submitted responses to federal IRs in July 2023. CNSC staff deemed the [submission incomplete in August 2023](#). On August 18, 2023, Denison re-submitted the EA package, and CNSC staff deemed the [submission complete](#) and the FIRT proceeded with a second round of technical reviews. CNSC staff shared a [second round of IRs](#) for Denison to address in December 2023.

TIMELINES



WHERE WE ARE NOW

In February 2024, Denison resubmitted the draft EIS with responses to the federal IRs. A third round of technical reviews have been concluded by the FIRT, and outstanding comments were shared with Denison in a series of technical meetings. Denison has provided supplemental information and this review is still underway. Once complete, the results of the review will be shared back with Denison and posted to the [Canadian Impact Assessment Registry](#).

With regards to the licensing technical review, Denison continues to develop, submit and revise licensing documents in order to address CNSC staff's comments. Final decisions on EA and on licensing must be made via a public Commission hearing, which will welcome Indigenous and public participation. No such hearing has yet been scheduled.

UPCOMING OUTREACH

CNSC staff will continue to engage on the Wheeler River Project and are planning outreach events for 2024 and 2025, related to Denison's *in situ* mining proposal as this project progresses. Stay tuned!



CNSC staff fishing with Kineepik Métis Local at the Pinehouse Elder's Gathering in June 2024.

STAY INFORMED, STAY CONNECTED!

Subscribe to the updated [Canadian Impact Assessment Registry notifications service](#) to receive updates on the Wheeler River EA process, and any other EA or Impact Assessment Processes that you are interested in. When you subscribe to this notification service, you will receive a personalized email when new content is posted on the Canadian Impact Assessment Registry for the projects you are following. Head over to www.iaac-aeic.gc.ca to sign up!

Wheeler River Project Bulletin

If you have any questions or suggestions on topics or issues that you would like to see covered, please do not hesitate to contact us:

Email : WheelerRiver@cnsccsn.gc.ca

Project Page: <https://ceaa-acee.gc.ca/050/evaluations/proj/80178>

Canadian Nuclear Safety Commission

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Email: cnsccsn@nscs.gc.ca

Website: nuclearsafety.gc.ca

Canadian Nuclear Safety Commission
Update on *Regulatory Oversight Report for Uranium Mines and Mills in*
Canada: 2023

September 18, 2024 – 9:00 AM – 4:00 PM (CST)
TCU Place – Saskatoon, SK

Morning Session – September 18, 2024
Coffee and snacks available 8:30-9:00

- | | |
|---|-------------------------|
| 1. Opening | 9:00 – 10:00 am |
| <ul style="list-style-type: none">• Prayer (Elder, TBD)• Welcome (Mr. Patrick Burton, CNSC)• Introductions (All)• Opening Remarks from Indigenous Nations who are interested | |
| 2. 2023 Uranium Mines and Mills Regulatory Oversight Report | 10:00 - 10:45 am |
| <ul style="list-style-type: none">• CNSC presentation, including site updates on McArthur River, Key Lake, Cigar Lake, McClean Lake, and Rabbit Lake | |
| <i>Coffee/Health Break</i> | 10:45 – 11:15 am |
| 3. 2023 Uranium Mines and Mills Decommissioned Sites Regulatory Oversight Report | 11:15 – 12:00 pm |
| <ul style="list-style-type: none">• CNSC presentation, including decommissioned site updates on | |
| <i>Lunch (provided)</i> | 12:00 - 1:00 pm |

Afternoon Session – September 18, 2024

- | | |
|---|-----------------------|
| 4. Environmental Assessment Updates | 1:00 – 2:00 pm |
| 5. IEMP and Blueberry Study | 2:00 – 2:45 pm |
| <i>Coffee/Health Break</i> | 2:45 – 3:15 pm |
| 6. Canadian Nuclear Workers Study Update | 3:15 – 3:45 pm |
| 7. Closing | 3:45 - 4:00 pm |
| <ul style="list-style-type: none">• Question and answer• Closing remarks (Patrick Burton, any others who wish to provide remarks)• Closing Prayer (TBC) | |

From: [Wheeler River Project - Projet de Wheeler River](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan](#); [Way, Jessica](#);
[cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#);
[bnatomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#);
[slandriecrossland@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#);
[mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#);
[dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#);
[claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#);
[trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#);
[conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#);
Bcc: [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#);
[bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#);
[tcooksearson@lrib.ca](#); [ty.roberts@lrib.ca](#); [ashley.carlson@lrib.ca](#); [gchristiansen@lrib.ca](#);
[jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [mellissa.winfield-lesk@hatch.com](#);
[hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#);
[scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#); [Dennis Sherratt](#);
[jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [alfreddawatsare@erfn.net](#); [Noakes, Rain](#); [McKeown, Justin](#); [Nickolet, Sydney](#); [Chani Campbell](#); [Janna Switzer](#); [Brianne England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#);
Subject: CNSC Wheeler River EA Update - Completion of the Technical Review of Denison's February 2024 EIS Package
Sent: 2024-10-18 8:21:00 PM

Hi Everyone,

I am reaching out to provide an update on the Wheeler River EIS technical review.

Following Denison's February 10th submission of responses to Information Requests (IRs) and the revised Environmental Impact Statement package, on February 20, 2024, CNSC staff found the submission to contain the required information to proceed with an additional round of review by the Federal-Indigenous Review Team (FIRT). This 90-day review was intended to conclude by May 20, 2024.

When the review initially started, Denison requested the opportunity to discuss the outcome of the review process, to discuss the paths to resolution with relevant FIRT members, where elements of IRs remained unresolved. On May 24th and 31st, 2024, CNSC staff shared draft reviews of responses to IRs with Denison, and on June 28th, 2024, a draft Advice to Proponent table. Of the 256 IRs (238 original and 18 follow-up), 24 IRs were not accepted. From June 5th to 14th, CNSC and Denison held 5 hybrid and 3 virtual meetings to discuss unresolved IRs. Between July 2nd and 8th, Denison provided supplementary responses for further review by the FIRT. The activities that have occurred between May and October have resulted in a significantly extended review period. Following these meetings and supplemental submissions, the FIRT's technical review found that the submission does not fully meet EA regulatory requirements. Currently, 6 IRs remain not accepted and 5 IRs remain under CNSC staff review.

The results of this review, along with the supplemental information provided throughout the June meetings and July submissions, have all been posted to the Registry:

- [Cover Letter- CNSC to Denison- Results of the Federal Indigenous Technical Review of the Wheeler River Project Submission \(2024-10-11\)](#)
- [Annex 1 – FIRT- Wheeler River Draft Review of Responses to IRs- Draft Table \(2024-05-24\)](#)
- [Annex 2 – FIRT- Wheeler River Draft Review of Responses to IRs- Draft Table \(2024-05-31\)](#)
- [Annex 3 – FIRT – Wheeler River Advice to Proponent Table- Draft Table \(2024-06-28\)](#)
- [Annex 4- Joint FIRT-Denison IR Technical Meetings for Wheeler River – Meeting minutes and presentations \(2024-06\)](#)
- [Annex 5 – Wheeler River – Combined Supplementary Submissions from Denison \(2024-07\)](#)
- [Annex 6- Information Requests for the Wheeler River Project Submission \(2024-10-11\)](#)
- [Annex 7- FIRT Advice to Proponent for the Wheeler River Project Submission \(2024-10-11\)](#)

CNSC staff expect Denison to submit complete revised responses to all IRs. It is expected that along with each response, Denison clearly indicate what changes will be made to the EIS and supporting documents, to be validated upon a future submission of a Final EIS. Following a submission that meets all outstanding regulatory requirements for the EA, CNSC staff will signal that a Final EIS can be submitted. CNSC staff expect that supplementary documentation that has been revised over the course of recent months will accompany the Final EIS package, including a revised Commitment Register and IER. Once the revised EIS meets regulatory standards, CNSC staff will develop an EA report.

The following documents were also provided by Denison during this review period, on July 17, 2024. These have been posted to the Registry:

- [Indigenous Engagement Report \(2024-07-17\)](#)
- [Indigenous Engagement Report- Appendix B: Records of Engagement \(2024-07-17\)](#)

- [Commitments Register Version 2 \(2024-07-17\)](#).

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnsccsn.gc.ca

Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Way, Jessica](#);
['cheyenna.hunt@desnedhe.com'](#); ['jenny.wolverine@erfn.net'](#); ['nvp.mike@sasktel.net'](#);
['bнатomagan@kineepik.ca'](#); ['glenmccallum@mns.work'](#); ['blaroque@mns.work'](#);
['slandriecrossland@mns.work'](#); ['rsmith@mns.work'](#); ['sfladager@mns.work'](#); ['aspriggs@mns.work'](#);
['mbrunet@mns.work'](#); ['garrett.schmidt@yathinene.com'](#); ['shea.shirley@yathinene.com'](#);
['dana.kellett@yathinene.com'](#); ['bruce.hanbidge@yathinene.com'](#); ['kevin.mercredi@outlook.com'](#); ['b-tsannie@hotmail.com'](#); ['csayazie@hotmail.com'](#); ['d.powder.nhsr@sasktel.net'](#); ['d.classen@sasktel.net'](#);
['claire_larock@hotmail.com'](#); ['chief1@birchnarrows.ca'](#); ['andrew@tamarackenvironmental.ca'](#);
['trevor.moberly@birchnarrows.ca'](#); ['robert.sylvester@birchnarrows.ca'](#); ['kimsylvestre@birchnarrows.ca'](#);
['conrad.sylvester@birchnarrows.ca'](#); ['terrie.campbell@birchnarrows.ca'](#);

Bcc: ['douglas.barks@birchnarrows.ca'](#); ['norma.catarat@brdn.ca'](#); ['receptionist@mltc.net'](#);
['karenbird@pbcn.ca'](#); ['tmerasty@pbcn.ca'](#); ['bmerasty@pbcn.ca'](#); ['patti@mccunn-miller.com'](#);
['cbeatty@pbcn.ca'](#); ['skmerasty@pbcn.ca'](#); ['cagnew@lgl.com'](#); ['tcooksearson@lrib.ca'](#);
['ty.roberts@lrib.ca'](#); ['ashley.carlson@lrib.ca'](#); ['gchristiansen@lrib.ca'](#); ['jtsanniejr@pagc.net'](#);
['rmcleod@pagc.net'](#); ['mellissa.winfield-lesk@hatch.com'](#); ['hklein@twoworldsconsulting.com'](#);
['jswitzer@denisonmines.com'](#); ['cinglismcquay@denisonmines.com'](#); ['scoupland.sgcresearch@gmail.com'](#);
['mirmirans@cna.ca'](#); ['Bruce Hanbidge'](#); ['Dennis Sherratt'](#); ['jessielacosta2017@gmail.com'](#); ['Damien Georges'](#); ['Gorzowski, Konrad'](#); ['Kwamena, Nana-Owusua'](#); ['Burton, Patrick'](#); ['Takala, Torin'](#); ['Paul James'](#);
['Noakes, Rain'](#); ['McKeown, Justin'](#); ['Nickolet, Sydney'](#); ['Chani Campbell'](#); ['Janna Switzer'](#); ['Brianne England'](#);
['Carolanne Inglis-McQuay'](#); ['Executive Secretary'](#); ['Margaret Rosling'](#); ['alfred.dawatsare@erfn.net'](#);
['Brianne England'](#);

Subject: CNSC Wheeler River EA Update - Review of October 2024 EIS Package

Sent: 2024-11-04 4:27:00 PM

Hi Everyone,

We are reaching out to provide another update on the Wheeler River EIS technical review.

Following our previous update on October 11th, Denison Mines Corp. (Denison) re-submitted revised responses and supporting documentation for the proposed Wheeler River Project, on October 18th. CNSC staff conducted a completeness check and determined that outstanding IRs have passed completeness and supporting submissions are adequate to proceed to the EIS Technical Review. More information can be found in the [October 25, 2024 letter to Denison](#), and [completeness check table](#).

The next phase of technical review by CNSC Subject Matter Experts is underway, for completion by November 15th, 2024. The review includes the following documents:

- [Wheeler River Project: Denison's Responses to Information Requests from the Federal and Indigenous Review Team \(October 18, 2024\)](#)
- [Wheeler River Project: Appendix A to Denison's Responses to Information Request \(October 18, 2024\)](#)
- [Wheeler River Project: Advice to Proponent Table \(October 25, 2024\)](#)

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Way, Jessica](#); [alfred.dawatsare@erfn.net](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [bнатомagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blarogue@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#);

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Subject: CNSC Wheeler River EA Update - Accepted IRs and Completion of EIS Technical Review

Sent: 2024-11-22 5:39:00 PM

Hi Everyone,

On November 20th, the Canadian Nuclear Safety Commission (CNSC) completed their technical review of Denison Mines Corp.'s (Denison) responses to outstanding Information Requests (IRs) for the Wheeler River environmental impacts statement (EIS) technical review. CNSC has found that the information fully addresses the regulatory requirements for the environmental assessment (EA). All responses to IRs are now deemed as accepted.

The following documents have now been posted to the [Canadian Impact Assessment Registry](#):

- [Cover Letter- CNSC to Denison- Results of the Federal Indigenous Technical Review of the Wheeler River Project Submission \(2024-11-20\)](#)
- [Annex 1 – Results of the Federal Indigenous Technical Review of the Wheeler River Project – Resolved Information Requests for the Wheeler River Project Submission \(2024-10-11\)](#)
- [Wheeler River – October 30th Supplementary Submission for IR-174 from Denison- Memo: Omnia Ecological Services, Denison Wheeler River 2024 Replicate Bat Surveys \(2024-10-30\)](#)
- [Wheeler River – November 13th Supplementary Submission from Denison for IR-114 and IR-174 \(2024-11-13\)](#)
- [Wheeler River – November 19th Supplementary Submission from Denison for IR-114 \(2024-11-19\)](#)

As we have indicated in the past, the next steps involved Denison submitting a Final EIS package, including revised responses to the Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project. This submission will undergo a 30-day review by CNSC staff to ensure all documents have been updated accordingly and that all comments from Indigenous Nations and Communities and members of the public have been addressed in an acceptable manner.

As of this afternoon, Denison has submitted the final EIS package. Once we have validated that the submission is complete, staff will begin our review. Once CNSC staff deems the submission as Final, staff will notify Denison that the EIS has been accepted and will proceed with developing the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) EA Report summarizing the results of the technical review and staff's recommendations to the Commission. Please note, this documentation will not be posted until it has been accepted as final.

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Way, Jessica](#);
[alfred.dawatsare@erfn.net](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#);
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[Janna Switzer](#); [Brianna England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#);
[alfred.dawatsare@erfn.net](#); [Brianna England](#); [Kwamena, Nana-Owusua](#); [Frigault, Nicole](#);

Bcc:

Subject: CNSC Wheeler River December 2024 EA Update - Accepted Final EIS

Sent: 2024-12-24 12:28:00 PM

Hi Everyone,

In our last update, we noted the completion of the technical review of Denison Mines Corp.'s (Denison) responses to outstanding Information Requests (IRs) for the Wheeler River environmental impacts statement (EIS). This update had also indicated that on November 22nd Denison submitted a final EIS package.

Following a 30 day review, the Canadian Nuclear Safety Commission (CNSC) has accepted the final EIS. This acceptance follows a comprehensive EIS technical review process by the Federal Indigenous Review Team (FIRT), including consultations with Indigenous Nations and communities and members of the public. CNSC staff will now proceed with the preparation of the *Canadian Environmental Assessment Act, 2012* Environmental Assessment (EA) Report, which will be made available, along with a Commission Member Document, for review by Indigenous Nations and communities and the public prior to a public Commission hearing.

The following documents have now been posted to the Canadian Impact Assessment Registry (CIAR) for this project:

- [Letter: CNSC to Denison - Wheeler Project - Acceptance of the Final EIS and Supporting Documents](#)
- [Final environmental Impact Statement](#)
- [Combined Final EIS Appendices](#)
- [Commitments Register Version 5 - Wheeler River Final EIS Submission](#)

With these conclusions, along with the sufficient licence application, CNSC staff will notify CNSC Commission Registrar of this acceptance, who will proceed with scheduling public hearing dates. Further details regarding how to participate will be provided once the Commission Secretariat has announced the hearing dates. In early January, notifications will be sent to Indigenous Nations and communities with detailed next steps in the consultation process.

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

From: [Way, Jessica](#)
To: [REDACTED]
Cc: [Levine, Adam](#); [Burton, Patrick](#); [Way, Jessica](#); [Froess, Ryan](#); [Duhaime, Brenda](#); [Gorzkowski, Konrad](#); [Noakes, Rain](#); [Zenobi, Adam](#); [Wheeler River Project - Projet de Wheeler River](#); [McKeown, Justin](#); [Kwamena, Nana-Owusua](#); [REDACTED]
Subject: Next Steps of Consultation with [REDACTED] - Proposed Wheeler River Project
Attachments: [2025-01-22-Letter-CNSC_to_\[REDACTED\]_-_Next_steps_of_the_Regulatory_Process-Wheeler_River_EA_.pdf](#)
Sent: 2025-01-22 6:57:40 PM

[REDACTED]
I am sending the attached letter on behalf of the CNSC, outlining proposed next steps of the CNSC's consultation process with [REDACTED] for the Wheeler River regulatory review process.
We look forward to hearing back from you and setting up a meeting to discuss further.
Sincerely,

Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.



CIAR NO.: 80178

e-Doc: 7448327

January 22, 2025

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Subject: Proposed Next Steps of Consultation with [REDACTED] for the Remaining Steps of the Regulatory Review Process for the Proposed Wheeler River Project

Dear [REDACTED]

The purpose of this letter is to provide an update and share a proposed consultation approach with [REDACTED] on the remaining steps of the regulatory review process for Denison Mines Corp.'s (Denison) proposed Wheeler River Project (the Project).

Current Status of the Process of the federal Environmental Assessment

On December 24, 2024, the federal review of Denison's Environmental Impact Statement (EIS) concluded, and the Final EIS was accepted by CNSC staff as it meets the requirements of the *Canadian Environmental Assessment Act*, 2012 (CEAA, 2012). As communicated in CNSC's December 24th, 2024 email to the project distribution list for the project, the documents can be found on the [Canadian Impact Assessment Registry \(the Registry\)](#).

CNSC staff have reviewed the responses Denison provided to comments that were received during the public comment period on the draft EIS in 2023, including those from [REDACTED]. The comments and Denison's responses are now [available on the Registry](#). CNSC staff have also drafted responses to comments that were applicable to CNSC's oversight and responsibilities and look forward to further discussing these as part of our proposed next steps as described below. CNSC's responses to these comments can also be [found on the Registry](#).

Proposed Next Steps of Consultation

Building on the ongoing consultation, relationship building, and engagement that began in 2019 between [REDACTED] and CNSC in relation to the Project, CNSC staff provide the consultation approach as outlined in Appendix 1. Table 1 of this letter details the suggested consultation and collaboration activities for the remaining steps of the regulatory review process for the Project.

The CNSC staff will be preparing the following reports and documents to support staff's recommendations to the Commission:

- **An EA Report** which provides information and analysis to assist the Commission in its determination on whether the proposed project is likely to cause significant adverse environmental effects.
- **A Consultation Report** which will include an assessment of the Project's potential impacts to the Rights and interests of select Indigenous Nations and communities as well as recommendations regarding the Duty to Consult and Accommodate.
- **A Commission Member Document (CMD)** which presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation.

CNSC staff are interested in collaborating with [REDACTED] to ensure that [REDACTED] perspectives, issues and concerns, Indigenous Knowledge and Land use information, potential impacts of the proposed Project on [REDACTED] rights, and other topics of interest to [REDACTED] are properly reflected in CNSC staff's reports and recommendations. This would involve CNSC staff developing the content as a first step based on information that [REDACTED] has submitted and provided to date to the CNSC and Denison and then sharing the draft content with [REDACTED] representatives for their review and comment. CNSC staff will be providing detailed timelines on the remainder of the regulatory process once a Commission hearing date has been identified by the Commission Registry.

The activities outlined in the proposed consultation approach are flexible, and CNSC staff would like to discuss these remaining steps of the regulatory review process with [REDACTED]. Some potential topics for discussion include:

- review of, and input to the CNSC's assessment of the Project's potential impacts on [REDACTED] rights and interests
- review of sections of CNSC's Consultation Report specifically related to information on [REDACTED] community member perspectives, knowledge, land use, concerns, and rights
- awarding funding through the CNSC's PFP to support the review of CNSC's reports and consultation and engagement with the CNSC
- discussions and collaboration with the CNSC and Denison, as appropriate, regarding potential commitments, mitigations and accommodations to address potential impacts on [REDACTED] rights and interests
- participation in the Commission hearing process through interventions as well as collaboration on the inclusion of [REDACTED] cultural practices and protocols as part of the Commission hearing process, as appropriate
- discussions on the assessment and overall evaluation of Denison's engagement activities with [REDACTED] as per REGDOC 3.2.2: Indigenous Engagement
- discussion and collaboration with the CNSC on conclusions and recommendations related to topics of concern and interest to [REDACTED]

CNSC staff are committed to continued collaboration with [REDACTED] to ensure that the consultation for the Project is meaningful, addresses [REDACTED] concerns, protects your Nation's rights and interests,

and upholds the Honour of the Crown. To discuss any matters related to the regulatory review process of the Project, please contact:

- Jes Way, Environmental Review Officer, Wheeler River EA Lead
Email: jessica.way@cnscccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous Consultation and Engagement Division
Email: ryan.froess@cnscccsn.gc.ca

Please review the proposed consultation process for the remaining steps of the regulatory review process for the Wheeler River Project (Appendix 1) and **provide any feedback by February 17, 2025 or we would be happy to set up a meeting to discuss.**

The CNSC looks forward to continuing to build a long-term relationship with [REDACTED] and working together throughout the regulatory review process for the proposed Wheeler River Project.

Yours sincerely,



Nana Kwamena
Director
Environmental Review Division
Canadian Nuclear Safety Commission



Justin McKeown
A/ Team Leader, Western & Northern Regions
Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission

c.c./c.c. : CNSC: A. Levine, P. Burton, J. Way, R. Froess, B. Duhaime, K. Gorzkowski, R. Noakes, A. Zenobi
[REDACTED]

Enclosure: (1) Proposed consultation process with [REDACTED] for the regulatory review process of the Wheeler River Project

References:

- [1] CNSC, Regulatory Guide, *REGDOC- 3.2.2: Indigenous Engagement*, Version 1.2, February 2022, <https://www.cnscccsn.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc3-2-2-v1-2/>
- [2] CNSC, *Generic Guidelines for the Preparation of an Environmental Impact Statement*, May 2016, <http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>

Appendix 1

Proposed Consultation Process with [REDACTED] for the Remaining Steps of the Regulatory Review Process of the Wheeler River Project

1. Introduction

These proposed next steps in the consultation process, which started in 2019, are intended to guide federal Crown consultation activities (led by the CNSC) with [REDACTED] during the remaining steps of the regulatory review process of the Wheeler River Project (the Project). They communicate the federal CNSC's objectives for consultation, the proposed structure for integrating consultation into the regulatory review process, and the proposed activities in which the CNSC and [REDACTED] can work together to address [REDACTED] concerns regarding the Project.

2. CNSC's Consultation Objectives

- To continue the establishment of a positive and productive working relationship with [REDACTED] during the remaining steps of the regulatory review process.
- To communicate with [REDACTED] about the Project and developments during the regulatory review process in a timely manner.
- To establish how [REDACTED] would like to be consulted during the remaining steps of the regulatory review process and establish a flexible and responsive consultation approach that is consistent with the consultation approach to date.
- To work with [REDACTED] to continue to:
 1. identify any potential environmental effects of the Project, including those on current use of lands and resources for traditional purposes, health and socio-economic conditions, and heritage resources
 2. identify adverse impacts of the Project on your community's potential or established rights
 3. ensure options for avoiding, mitigating, or accommodating adverse impacts are considered
- To work with [REDACTED] and the proponent to respond to specific questions and requests regarding issues raised related to the Project.
- To listen to and understand the concerns raised, and consider the feedback, perspectives, and issues raised by [REDACTED] in order to inform decision-making.
- To collaborate with [REDACTED] and the proponent to identify any potential commitments, mitigations, accommodations and conditions to address [REDACTED] concerns regarding any potential impacts on [REDACTED] rights and interests as a result of the proposed project.

3. Integrating Consultation into the Regulatory Review Process

Table 1 provides a description of the main remaining steps in the regulatory review process and a description of how the CNSC proposes to integrate consultation activities into those steps. This table describes what [REDACTED] should receive, have access to, or expect from the CNSC, on behalf of the federal Crown, and what [REDACTED] could share and provide to the regulatory review process.

Table 1: Integrating Consultation into the Remaining Steps of the Regulatory Review Process¹

Regulatory Review Step²	Description of Activities³	What [REDACTED] should receive, have access to, or expect from the federal Crown	Information [REDACTED] may want to consider providing to the federal Crown, and ways [REDACTED] may want to participate
Project Description Review and Scoping Decision (Completed in 2019-20)	<ul style="list-style-type: none"> Opportunity for [REDACTED] to provide comments on the Project Description – Completed 	<ul style="list-style-type: none"> CNSC notification to [REDACTED] of the project and project description review process – Completed PFP offering – Completed Early information sharing and offers of consultation meetings – Completed 	<ul style="list-style-type: none"> Provide comments on the project description – Completed

¹ Adapted from a template developed by the Canadian Environmental Assessment Agency (CEAA) (CEAA references the BC First Nations Environmental Assessment Technical Working Group Toolkit Workshop as a basis for this document).

² Any updates to dates related to the regulatory review process will be communicated to [REDACTED].

³ Denison's activities during this step of the regulatory review process are not specifically steps of the regulatory review process, but these are expectations of Denison, by CNSC staff.

Regulatory Review Step ²	Description of Activities ³	What [REDACTED] should receive, have access to, or expect from the federal Crown	Information [REDACTED] may want to consider providing to the federal Crown, and ways [REDACTED] may want to participate
<p>Environmental Impact Statement (EIS) Review</p> <p><i>(Initiated 2022 – complete as of December 24, 2024)</i></p>	<ul style="list-style-type: none"> • Opportunity for [REDACTED] to provide comments on draft EIS – Completed • Denison to revise documentation to address comments and concerns raised by [REDACTED] - Completed • Denison expected to discuss with [REDACTED] how their comments and concerns have been addressed. - Completed 	<ul style="list-style-type: none"> • Opportunity to provide feedback to the Crown on adequacy of Denison's responses to [REDACTED] comments and concerns. - Completed • Opportunity to participate in technical discussions with CNSC staff regarding [REDACTED] outstanding comments and concerns, as well as other discussions as necessary (e.g. teleconferences and/or meetings with Chief and Council, community open houses). - Completed • Opportunity to discuss how to integrate Traditional Knowledge and Land Use (TKLUS) information into the remaining steps of the regulatory review process. - Completed • Opportunity for direct and continued discussions between [REDACTED] and the CNSC. - Completed 	<ul style="list-style-type: none"> • Provide [REDACTED] views on the accuracy of Denison's information about issues [REDACTED] have raised and on any proposed ways of addressing those impacts. - Completed • Provide feedback on the adequacy of Denison's responses to [REDACTED] comments and concerns. - Completed • Participate in technical discussions with CNSC staff to address [REDACTED] outstanding comments and concerns. - Completed

Regulatory Review Step ²	Description of Activities ³	What [REDACTED] should receive, have access to, or expect from the federal Crown	Information [REDACTED] may want to consider providing to the federal Crown, and ways [REDACTED] may want to participate
<p>Development of draft Consultation Report</p> <p><i>(Current phase – 2025)</i></p>	<ul style="list-style-type: none"> The CNSC's Consultation Report also includes a summary of consultation with Indigenous Nations and communities, potential impacts to potential or established rights of Indigenous Nations and communities, views and concerns expressed by Indigenous Nations and communities and the CNSC's response to those concerns, and including potential mitigation and accommodation measures, and commitments and conditions to address those concerns. The CNSC's goal is to work towards a consensus on the key issues and concerns in relation to the proposed project with [REDACTED]. 	<ul style="list-style-type: none"> Opportunity to review and comment on sections of the draft Consultation Report specific to [REDACTED] such as Indigenous Knowledge and Land Use information, potential impacts of the Project on [REDACTED] rights and interests, and concerns expressed. <ul style="list-style-type: none"> CNSC staff writing the draft sections and providing to [REDACTED] for review and comment for consideration and/or inclusion. The objective is to obtain mutually agreed upon text, between CNSC staff and [REDACTED] (as noted in the next step, where [REDACTED] has diverging views with CNSC staff's analysis and findings, these will be reflected in the Consultation Report, and we also invite [REDACTED] to capture this information in their written and/or oral intervention to the Commission). 	<ul style="list-style-type: none"> Review and provide comment on sections of the draft Consultation Report specific to [REDACTED].

<p>EA Report, Consultation Report and Licensing CMD Review</p> <p>AND</p> <p>Commission Public Hearings</p> <p><i>(Hearing date 2025 –2026 TBD)</i></p>	<ul style="list-style-type: none"> • The EA Report presents the CNSC staff's evaluation on the findings of the EA, including conclusions and recommendations regarding the adverse environmental effects that are likely to result from the project, appropriate measures that would mitigate those effects, the significance of residual effects after implementation of the mitigation measures, as well as the components of the follow-up and monitoring program. • CNSC staff will submit and make publicly available, for review, the Final EA Report, Consultation Report, and licensing CMD in advance of public hearings (timing to be determined by CNSC Registry). • The licensing CMD presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation. • The Commission will hold public hearings with opportunities for public and Indigenous Nations and communities to submit oral and/or written interventions. CNSC staff and the Registry are open to working with [REDACTED] to 	<ul style="list-style-type: none"> • Opportunity to review the Final EA Report, Consultation Report, and licensing CMD to inform oral and/or written interventions. 	<ul style="list-style-type: none"> • Present [REDACTED] views to the Commission by providing information orally and/or in writing. • It is recommended that any diverging views with CNSC staff's analysis and findings in the CNSC's reports be captured in [REDACTED] written and/or oral intervention to the Commission, if required.
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Regulatory Review Step ²	Description of Activities ³	What [REDACTED] should receive, have access to, or expect from the federal Crown	Information [REDACTED] may want to consider providing to the federal Crown, and ways [REDACTED] may want to participate
	ensure that the Commission hearings include and reflect [REDACTED] cultural protocols and processes.		
Commission's EA and Licensing Decisions (Future phase - TBD)	<ul style="list-style-type: none"> The Commission considers the EA Report, Consultation Report, CMD and interventions from the public and Indigenous Nations and communities and determines whether, taking into account the mitigation measures, conditions, accommodations and commitments proposed, the Project is likely to cause significant adverse environmental effects and if the duty to consult and accommodate was met. Should the Commission issue an EA decision statement allowing the Project to proceed, the Commission will also include legally binding conditions with which Denison must comply to implement appropriate mitigation measures and a follow-up and monitoring program. 	<ul style="list-style-type: none"> Notification and sharing of the Commission's Detailed Record of Decisions (EA and licensing). Meetings with [REDACTED] to discuss the Commission's decision and next steps for ongoing engagement and collaboration. 	<ul style="list-style-type: none"> Feedback on preferred approach to ongoing engagement, information sharing, oversight, monitoring, reporting and collaboration.

From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
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[jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [Noakes, Rain](#); [McKeown, Justin](#); [Boser, Sydney](#); [Chani Campbell](#); [Janna Switzer](#); [Brianne England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#);
[alfred.dawatsare@erfn.net](#); [Brianne England](#); [Kwamena, Nana-Owusua](#); [aj wilson](#);
Subject: CNSC Wheeler River February 2025 EA Update - Participant Funding Opportunity
Sent: 2025-02-03 3:50:00 PM

Hi Everyone,

The Canadian Nuclear Safety Commission (CNSC) is offering participant funding to assist Indigenous Nations and communities, members of the public and interested parties in reviewing the environmental assessment (EA) and licence application for Denison's Wheeler River Project and in participating in a future Commission hearing process. Here is the participant funding notice, with the details on how to apply: [Participant funding for Denison's Wheeler River Project](#)

This participant funding opportunity is open from February 3 to April 4, 2025.

Additional information about the Wheeler River EA process can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Boser, Sydney](#); [Way, Jessica](#); [alfred.dawatsare@erfn.net](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [bнатомagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeaty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#); [Dennis Sherratt](#); [jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [Noakes, Rain](#); [McKeown, Justin](#); [Boser, Sydney](#); [Chani Campbell](#); [Janna Switzer](#); [Brienne England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#); [alfred.dawatsare@erfn.net](#); [Brienne England](#); [Kwamena, Nana-Owusua](#); [aj wilson](#); [Duhaime, Brenda](#); [Trieneke Gastmeier](#); [Ryan Smith](#); [Keegan McGrath](#);

Bcc:

Subject: CNSC Wheeler River March 2025 EA Update - Hearing Dates and Participant Funding

Sent: 2025-03-06 8:24:00 PM

Hi Everyone,

On February 27, 2025, the Canadian Nuclear Safety Commission (CNSC) announced hearing dates for a public hearing on Denison Mines Corporation's licence application to prepare a site for and construct its Wheeler River mine and mill project. The hearing will also consider the Environmental Assessment, which is being conducted under the *Canadian Environmental Assessment Act*, 2012.

The two part hearing will be held as follows:

Part 1:

- Date: October 8, 2025
- Place: To be determined (National Capital Region and/or virtually via zoom)
- Time: As set by the agenda to be published prior to the hearing date

Part 2:

- Date: Week of December 8, 2025
- Place: To be determined (Saskatoon)
- Time: As set by the agenda to be published prior to the hearing date

More information can be found in the CNSC's public notice here: <https://api.cnscccsn.gc.ca/dms/digital-medias/Notice-of-Public-Hearing-and-Participant-Funding-2025-H-09.pdf/object>

Also, a reminder if you are planning to apply, **participant funding applications are due on April 4, 2025.**

Additional information about the Wheeler River EA process can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnscccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

B.2 Key Correspondence with English River First Nation

From: Phaneuf, Marcelle (CNSC/CCSN);
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'creemancon@gmail.com'; 'info@mltc.net'; Levine, Adam (CNSC/CCSN); Zenobi, Adam (CNSC/CCSN);
Akhter, Salman (CNSC/CCSN);
Subject: CNSC receives project description for a new in situ recovery uranium mine
Sent: 2019-04-09 11:56:00 AM

Good day,

On February 19, 2019, Denison Mines Corp. submitted a project description with the intent to develop an in situ recovery (ISR) uranium mine in the Athabasca Basin in northern Saskatchewan, 4 km west of Highway 914 and approximately 600 km north of Saskatoon.

If and when the project description is assessed by the Canadian Nuclear Safety Commission (CNSC) as complete, the next step would be to issue a notice of commencement. The project description would then become available for public comment as part of the environmental assessment process.

A formal letter of notification to your community with more information on the regulatory review process is forthcoming.

For more information on the CNSC's role in licensing uranium mines and mills, please visit:
<http://www.nuclearsafety.gc.ca/eng/uranium/mines-and-mills/index.cfm>

For more information on the CNSC's environmental assessment process, please visit:
<http://www.nuclearsafety.gc.ca/eng/resources/environmental-assessments/index.cfm>

Best regards,

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209



April 15, 2019

e-Doc: 5870914

Chief Lawrence McIntyre
English River First Nation
Box 30
Patuanak, SK S0M 2H0

Lawrence.mcintyre@erfn.net

Subject: Notice of Denison Mines Corp., Wheeler River Project, a Proposal for a New Uranium Mining Project in northern Saskatchewan.

Dear Chief McIntyre:

The purpose of this letter is to provide you with notice that the Canadian Nuclear Safety Commission (CNSC) has received a project description from Denison Mines Corp. (Denison) to develop a uranium mine located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. The proposed development is called the Wheeler River Project.

The proposed project requires a federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and will require authorization from the CNSC under the *Nuclear Safety and Control Act* (NSCA).

The proposed project includes underground and surface facilities to support the mining and processing of uranium ore using the In Situ Recovery (ISR) mining method. The main components of the project include:

- an ISR wellfield
- two freeze plants on the surface to establish a frozen isolated mining chamber underground
- an on-site plant to process the mining solution recovered from the ISR wellfield
- surface facilities to support the short and long term storage of waste rock
- water handling infrastructure and a water treatment plant
- additional infrastructure to support mining activities including but not limited to a camp for personnel, and supporting facilities such as an airstrip, waste and water management facilities, maintenance shops, warehouses, and offices

Vehicle access to the site would be provided by constructing a seven-kilometre section of road connecting Provincial Highway 914 to the Wheeler River site and a five-kilometre road from the site to the airstrip.

Environmental Assessment and Licensing

As part of their application, Denison will be seeking sequential EA and licensing processes such that EA and licensing matters will be considered at separate public Commission hearings. The Commission must make an EA decision that the project will not cause significant adverse environmental effects prior to making a licensing decision. Denison has submitted a project description to initiate the EA process, but has not yet submitted a full licence application to initiate the licensing process.

The proposed project will require an EA under CEAA 2012. The CNSC will be responsible for making both an EA and a licensing decision for this project. The CNSC is also the Crown Consultation Coordinator for the federal government for the project.

The proposed project is also subject to a provincial environmental assessment as it is a “development” as defined in section 2(d) of *The Environmental Assessment Act*. Therefore, Denison is also required to undertake a provincial EA for the project and seek approval from the Saskatchewan Minister of Environment prior to proceeding with the project. CNSC and the Saskatchewan Environmental Assessment & Stewardship Branch will work closely to coordinate our respective EA processes wherever possible.

Commission Hearing

Before the Commission can make a decision on the licence application, a public hearing will be held to ensure that the Commission has the information it needs, and that Denison and interveners (including Indigenous groups and members of the public) have had a reasonable opportunity to present relevant information to the Commission. The CNSC encourages your participation in the review process, including the public hearing.

The Commission’s public hearing for the Wheeler River Project has not yet been scheduled. We will provide you with an update once further details are confirmed regarding the timing, location and format of the Commission hearing for this project.

For more details on CNSC’s public hearing processes, you can visit the web link:
<http://nuclearsafety.gc.ca/eng/the-commission/hearings/participate/index.cfm>.

Participant Funding Program

The CNSC has established a Participant Funding Program (PFP) to enhance participation in the CNSC’s regulatory processes. Funding for this project will be offered in two phases. The first phase will be for the review of the draft Environmental Impact Statement, while the second phase will be for the remainder of the regulatory process. The availability of the first phase of PFP will be announced within the next few months (around the same time as the Commission makes its decision on the scope

of the EA). Once the availability of funding is announced we will provide you with further details on the application process, scope of funding and amounts available.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>

If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnscc.pfp.ccsn@canada.ca.

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands the importance of consulting and building relationships with Canada's Indigenous peoples.

As an Indigenous group with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project and encourages you, during the review process, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project

Next Steps

Once the final project description has been submitted by Denison, CNSC staff will provide your community with further details on the federal EA process to be followed for the proposed project.

The CNSC will be posting a Notice of Commencement on the Canadian Environmental Assessment Registry within the next few weeks. At the same time as the posting of the Notice of Commencement, the CNSC will also post the project description for a 30 day review and comment period.

As part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the following documents:

- the project description
- the draft Environmental Impact Statement

Indigenous groups and members of the public will also be given the opportunity to submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation).

We are interested in meeting with your community in person, or by teleconference if preferred, to discuss the proposed project, and we would be happy to arrange for this to happen. Please note that the CNSC is also able to offer, upon request, participant funding for such meetings and other related activities to help enable your on-going participation and engagement throughout the EA and regulatory review process.

Staying Informed

The CNSC is committed to ongoing consultation and engagement with you and your Nation in relation to this proposed project and will be providing information updates directly to you at key points in the regulatory process.

In addition, if you wish to receive e-mail notifications when the CNSC's website is updated, including notices for hearings, meetings and PFP funding opportunities, you can sign-up to the CNSC mailing list by visiting the following web link and choosing the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact the Crown Consultation Coordinator on this file, Marcelle Phaneuf, by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,



Candida Cianci
Director, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Location of the proposed Wheeler River uranium mine project

Appendix B: Indigenous Consultation and Engagement at the CNSC (e-Doc: 5862079)

c.c.: C. Campbell (ERFN)
P. Fundarek, M. Landon, S. Akhter, M. Phaneuf, A. Levine, A. Zenobi (CNSC)
A. Sadik, B. England (SEASB)

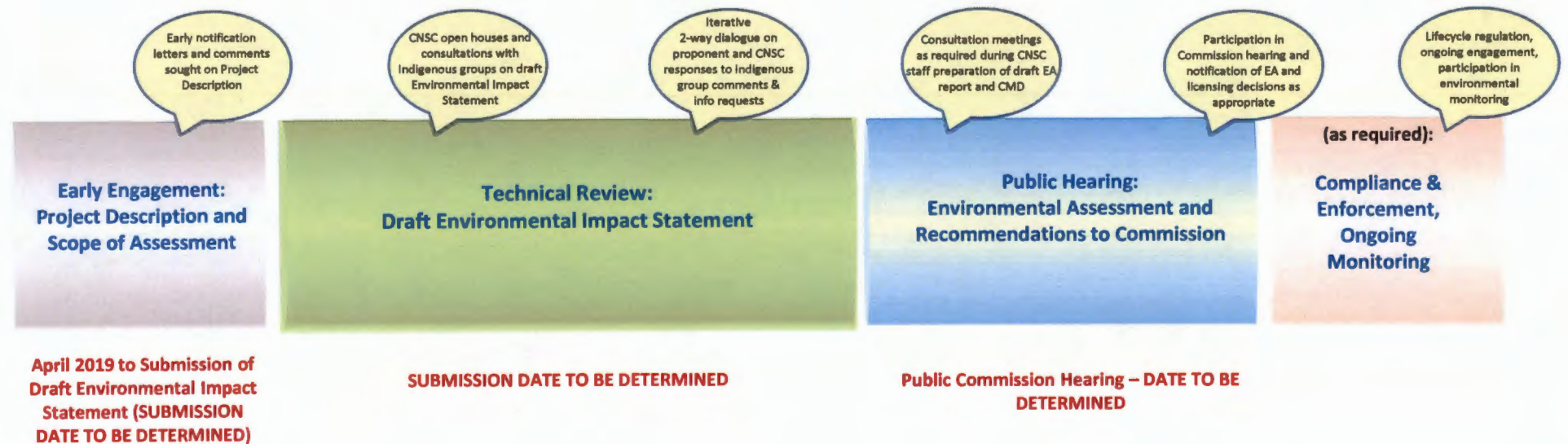
A similar letter was sent to the following groups:

- English River First Nation
- Hatchet Lake First Nation
- Birch Narrows Dene Nation
- Buffalo River Dene Nation
- Black Lake First Nation
- Fond-du-Lac Denesuline First Nation
- Ya'thi Néné Lands and Resource Office
- Prince Albert Grand Council
- Métis Nation of Saskatchewan (Northern Region 1)
- Kineepik Métis Local Pinehouse # 9 (Métis Northern Region 3)
- Meadow Lake Tribal Council

Appendix A: Location of the proposed Wheeler River uranium mine project



Appendix B: Indigenous Consultation and Engagement at the CNSC



From: Phaneuf, Marcelle (CNSC/CCSN);
'b-tsannie@hotmail.com'; 'nvp.glen@sasktel.net'; 'leonardmontgrand@yahoo.ca';
'csayazie@hotmail.com'; 'louiemercredi.fdl@sasktel.net'; 'Garrett.schmidt@yathinene.com';
'chief1@birchnarrows.ca'; 'lawrence.mcintyre@erfn.net'; 'receptionist@mltc.net';
To: 'eileenmorrison62@yahoo.ca'; 'nvp.mike@sasktel.net'; 'mcalette@mns.work'; 'jtsanniejr@pagc.net';
'mcalette@mns.work'; 'b.merasty@mns.work'; 'geraldmorin@hotmail.com'; 'earl.cook@norstep.ca';
'tibbeavereye@hotmail.com'; 'clhmercledi@sasktel.net'; 'victorf@sasktel.net';
'fdlreception@sasktel.net'; 'Linda.mcnaabb@yathinene.com'; 'bandmanager@birchnarrows.ca';
'cheyenna.campbell@desnedhe.com'; 'vince.pinehousedc@sasktel.net'; 'creemancan@gmail.com';
Subject: Public comment period on the Project Description for the proposed Wheeler River Project – Denison
Mines Corp.
Sent: 2019-05-31 4:07:00 PM

Follow Up Flag: Follow up

Flag Status: Flagged

Good afternoon,

The Canadian Nuclear Safety Commission (CNSC) is [seeking comments](#) from the public and Indigenous groups on the project description for the proposed Wheeler River Project (<https://www.ceaa.gc.ca/050/documents/p80178/130098E.pdf>).

The project involves the construction of a new uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine.

The CNSC reviewed the project description and determined that it was written in accordance with the Prescribed Information for the Description of a Designated Project Regulations. (These regulations are made under the Canadian Environmental Assessment Act, 2012). Detailed information about the project will be available in the environmental impact statement, which Denison Mines Corp., the proponent, will submit at a later stage of the environmental assessment (EA) process.

Comments on the project description should be based on local, regional or traditional knowledge of the site or surrounding environment, or provide any other relevant information that may help with the conduct of the EA. All comments received will be considered public.

Written comments must be submitted by June 30, 2019, to:

Marcelle Phaneuf, Environmental Assessment Officer
Canadian Nuclear Safety Commission
P.O. Box 1046 Station B
280 Slater Street
Ottawa ON K1P 5S9
Telephone: 613-947-3209 or 1-800-668-5284
Fax: 613-995-5086
Email: cnscc.ea-ee.ccsn@canada.ca

Following receipt of comments on the project description, CNSC staff will consider all submissions received and make recommendations to inform the Commission's decision on the scope of the factors to be considered in the EA. In addition, CNSC staff will respond to all comments received from members of the public and Indigenous groups. The comments and responses will be placed in a table and publicly posted to the Canadian Environmental Assessment Registry. Effort will be made to group common issues together.

Following the Commission's decision on the EA scope, Denison Mines Corp. will then be required to provide to the CNSC an environmental impact statement (EIS) for review. An EIS is a report that a proponent writes to present the technical studies and findings of an EA. The CNSC's Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012 (<http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>) provide general instructions on preparing the EIS and information that must be included in it in order to comply with CEAA 2012 requirements.

If you have any questions, please do not hesitate to contact me at marcelle.phaneuf@canada.ca or by telephone at 613-947-3209.

Kind regards,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada

marcelle.phaneuf@canada.ca / Tél: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209



English River
First Nation

English River First Nation
Lands & Resources Office
301-2555 Grasswood Road
Saskatoon, SK S7T 0K1

Tel: 306.649.6111

Fax: 306.664.8923

E: cheyenna.campbell@desnedhe.com

June 19, 2019

Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, ON.
Canada, K1P5S9

“VIA EMAIL marcelle.phaneuf@canada.ca”

ATTN: Marcelle Phaneuf, Environmental Assessment Officer

Dear Madame:

RE: English River First Nation Traditional Territory

I write further to our telephone conversation of June 17, 2019, wherein you invited ERFN to provide comment on Denison Mines Corporation's (Denison) Wheeler River Project.

As the Lands & Resources Officer, and a member of the English River First Nation (ERFN), I would like to take this opportunity to reinforce with the Canadian Nuclear Safety Commission (CNSC), ERFN's claim to our Traditional Territory in Northern Saskatchewan.

ERFN is the First Nation impacted by Denison's proposed Wheeler River Project for the following reasons:

1. The ERFN Traditional Land Map that was developed in the 1990's clearly illustrates the fact that Denison's Wheeler River Project falls squarely within ERFN's Traditional Territory. This map was developed using the historical oral knowledge from ERFN Elders, along with contemporary ERFN land users thereby establishing the borders of ERFN Territory. The map indicates trap lines, routes of travel, sites of historic interest, burial sites, and ERFN Reserve Lands;
2. The Wheeler River project is located within 100 km of 7 of ERFN's reserve lands. In selecting Treaty Land Entitlement lands, ERFN chose to strategically select reserve lands throughout Northern Saskatchewan, within close proximity to Cree Lake. Cree Lake is the heart of the English River First Nation Traditional Territory. The TLE Land selections were

made to protect ERFN's claim to the area, so that our members may continue to carry on our traditional way of life- hunting, fishing, and trapping as we have done for generations; and

3. The Wheeler River project falls within the N-16 / N-18 Fur block which was amalgamated in 1992 by the users of those Fur blocks- the members of ERFN. It is an open Fur block, however only ERFN members use it. The president of the Fur block is Norman Wolverine- retired ERFN Lands Manager, traditional land user, and ERFN Member. The families that have trap lines within the Fur block are all ERFN members; the family names are: John, Wolverine, Campbell, McIntyre, Lariviere, Janvier, Gunn, George, Dawatsare, etc. These are historical family trap lines that have been used by generations.

For the above noted reasons, ERFN asserts our standing as the impacted Indigenous community. And as such, we look forward to continuing the engagement and consultation process.

Sincerely,



Cheyenna Campbell, B.A., LL.B.
Lands & Resources Officer
English River First Nation

cc:

Carolanne Inglis-McQuay – Denison Mines
Chief Lawrence McIntyre - English River First Nation

/CRC

From: Phaneuf, Marcelle (CNSC/CCSN);
'cheyenna.campbell@desnedhe.com'; 'csayazie@hotmail.com'; 'tlbbeavereye@hotmail.com';
'louiemercredi.fdl@sasktel.net'; 'clhmercledi@sasktel.net'; 'victorf@sasktel.net';
'fdlreception@sasktel.net'; 'b-tsannie@hotmail.com'; 'moniquethomas2016@gmail.com';
'pdenechezhe@gmail.com'; 'nvp.glen@sasktel.net'; 'leonardmontgrand@yahoo.ca';
Bcc: 'mcalette@mns.work'; 'b.merasty@mns.work'; 'geraldmorin@hotmail.com'; 'earl.cook@norstep.ca';
'nvp.mike@sasktel.net'; 'vince.pinehousedc@sasktel.net'; 'chief1@birchnarrows.ca';
'bandmanager@birchnarrows.ca'; 'elmerc Campbell35@gmail.com'; 'receptionist@mltc.net';
'jtsanniejr@pagc.net'; 'creemancan@gmail.com'; 'garrett.schmidt@yathinene.com';
'Linda.mcnabb@yathinene.com'; 'michael.dawe@yathinene.com'; Wylie, Doug (CNSC/CCSN); Zenobi,
Adam (CNSC/CCSN);
Subject: Wheeler River Project - Commission Decision on the scope of the EA
Attachments: Record_of_Decision_-_Denison_Mines_Corporation_-_Scope_of_EA_on_the_proposed_Wheeler_River_Project.pdf
Sent: 2019-12-24 8:53:00 AM

Good day,

On December 20th, 2019, the Commission issued a decision on the scope of an environmental assessment for the proposed Wheeler River project. For your convenience, I have attached the Record of Decision to this email. You may also find it on the Registry [here](#).

In the next few weeks, the CNSC will send you a formal letter regarding this decision. The letter will also outline the next steps in the EA process as well as provide information related to participant funding (PFP) for this project.

As always, I am available for any questions or comments related to the Wheeler River project by phone or email. Best regards and best wishes for the holiday season.

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#) on behalf of [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: jerry.bernard@erfn.net
Cc: Jamie.dickson@desnedhe.com; cheyenna.campbell@desnedhe.com;
Subject: Letter re Notice of Commission Decision on Scoping of EA for Wheeler River Project and Next Steps
Attachments: [E-DOCS-#6089398-v2A-Letter_-_CNSC_to_ERFN_-_Wheeler_River_-_Notification....doc](#)
Sent: 2020-03-20 2:33:38 PM

Dear Chief Jerry,

On behalf of the Canadian Nuclear Safety Commission (CNSC), please accept my congratulations on your recent election as Chief of English River First Nation (ERFN). The CNSC looks forward to working with you in continuing to build a long term, meaningful relationship with ERFN.

The purpose of the attached letter is to notify you that on December 20, 2019, the Canadian Nuclear Safety Commission (CNSC) made a decision on the scope of factors to be considered in the environmental assessment of the Wheeler River Project (the Project) proposed by Denison Mines Corp (Denison).

The letter also informs you of the next steps in the EA process, including the fact that Denison Mines Corp has suspended activities on the environmental assessment.

I remain available for any questions or comments by phone or email,

Best regards

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209



March 20, 2020

e-Doc: 6089398

Chief Bernard Jerry
English River First Nation
Box 30
Patuanak, SK S0M 2H0
jerry.bernard@erfn.net

Subject: Notice of Commission Decision on the Scope of the EA for Denison Mines' Proposed Wheeler River Project and Status of the Project

Dear Chief Jerry:

On behalf of the Canadian Nuclear Safety Commission (CNSC), please accept my congratulations on your recent election as Chief of English River First Nation (ERFN). CNSC staff looks forward to working with you in continuing to build a long term, meaningful relationship with ERFN. The purpose of this letter is to notify you that on December 20, 2019, the Commission made a decision on the scope of factors to be considered in the environmental assessment (EA) of the Wheeler River Project (the Project) proposed by Denison Mines Corp (Denison).

The Commission, pursuant to section 19 of the *Canadian Environmental Assessment Act*, 2012 (CEAA 2012), determined the scope of factors to be considered in the EA for the Project to include the factors mandated by paragraphs 19(1) (a) to (h) of the CEAA 2012, with no additional factors. The Commission understands that, pursuant to subsection 19(3) of CEAA 2012, the EA for the Project will consider Indigenous traditional knowledge and community knowledge. See the enclosed copy of the Record of Decision for more details (Appendix A).

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands and values the importance of consulting and building relationships with Indigenous peoples in Canada.

As an Indigenous group with interest in this project, the CNSC is interested in hearing any views you may have with respect to the project. The CNSC encourages you, throughout the EA process and including but not limited to the review and comment periods, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns;

- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures; and
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project.

ERFN's participation in the EA is intended to be supported through the CNSC's Participant Funding Program (PFP). Please note that should additional funding be needed by ERFN, beyond the funding that will be awarded through the PFP, requests or applications for additional funding will be considered by the CNSC on a case-by-case basis.

Current Status and Next Steps

Now that the scoping decision had been rendered by the Commission, the next step in the process will be the submission by Denison of a draft Environmental Impact Statement (EIS). On March 20th, 2020, Denison placed a [hold](#) on EA activities related to the Project. Therefore, the CNSC does not anticipate the draft EIS to be submitted in 2020.

As part of the EA process, ERFN will have the opportunity to provide comments on Denison's draft EIS once it is submitted. In later steps of the process, ERFN will also have the opportunity to comment on CNSC staff's Environmental Assessment (EA) Report and Commission Member Document (CMD), and to submit comments to the Commission for an eventual EA hearing as a written intervention and/or oral presentation. In addition, CNSC staff will continue to reach out with offers to meet and conduct additional consultation and engagement activities throughout the EA process.

The first phase of PFP, for the review of the draft EIS, will be available some months prior to the draft EIS being submitted. The CNSC will be offering \$150,000, to be disbursed among all eligible applicants, to help in the review of the draft EIS. A second phase of PFP will be announced at a later date, to help in the review of the EA report and CMD, and to prepare an intervention for an EA hearing.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process for the Participant Funding Program: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm> If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccpsn@canada.ca.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact me by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,

Marcelle Phaneuf
Environmental Assessment Officer, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Record of Decision DEC 19-H111 in the Matter of Denison Mines Corporation – Decision on the Scope of an Environmental Assessment of the Proposed Wheeler River Project

c.c.: C. Campbell, ERFN
P. Fundarek, C. Cianci, C. Cattrysse, M. Landon, S. Akhter, A. Levine, A. Zenobi,
CNSC
A. Sadik, B. England, SEASB

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: ['jerry.bernard@erfn.net'](#); ['cheyenna.campbell@desnedhe.com'](#);
Fundarek, Peter (CNSC/CCSN); [Nana-Owusua Kwamena \(CNSC/CCSN\)](#) ([nana-owusua.kwamena@canada.ca](#)); Cattrysse, Clare (CNSC/CCSN); [Akhter, Salman \(CNSC/CCSN\)](#); [Froess, Ryan \(CNSC/CCSN\)](#); [Zenobi, Adam \(CNSC/CCSN\)](#); ['Sadik, Aimann ENV'](#); [England, Brianne ENV](#);
Cc:
Subject: Update Letter re Wheeler River Project and Next Steps
Attachments: [E-DOCS-#6490512-v1-2021-02-15_-_Letter_-_CNSC_to_ERFN_-_Restart_of_EA_activities.PDF](#)
Sent: 2021-02-15 10:15:00 AM

Follow Up Flag: Follow up

Flag Status: Flagged

Dear Chief Jerry,

The purpose of the attached letter is to provide you an update on the status of the proposed Wheeler project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including the potential for consultation with the CNSC.

I remain available for any questions or comments by phone or email,

Best regards
Marcelle Phaneuf

Marcelle Phaneuf, M.Sc

Environmental Assessment Specialist, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 343-551-4196 ** NEW**

Spécialiste en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 343-551-4196 ** NOUVEAU**



February 15th, 2021

e-Doc: 6482767

Chief Bernard Jerry
English River First Nation
Box 30
Patuanak, SK S0M 2H0
jerry.bernard@erfn.net

Subject: Notice of restart of activities on the Federal Environmental Assessment (EA) for Denison Mines' Proposed Wheeler River Project

Dear Chief Jerry:

The purpose of this letter is to notify you that Denison Mines Corp (Denison) has notified the CNSC that they have resumed Environmental Assessment (EA) activities related to the Wheeler River Project (the Project) on January 01, 2021, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The CNSC has also received a revised project description from Denison Mines Corp. for the Wheeler River Project (<https://www.ceaa-acee.gc.ca/050/evaluations/proj/80178>). The revisions do not constitute material changes to the project and therefore public consultation is not required.

Current Status and Next Steps

The next step in the EA process will be the submission by Denison of a draft Environmental Impact Statement (EIS). Denison has indicated that this submission can be anticipated in early 2022.

As part of the EA process, English River First Nation (ERFN) will have the opportunity to provide comments on Denison's draft EIS once it is submitted as part of the public review period. In later steps of the process, ERFN will also have the opportunity to comment on CNSC staff's Environmental Assessment (EA) Report and Commission Member Document (CMD), and to submit comments to the Commission for an eventual EA Commission hearing as a written intervention and/or oral presentation.

In addition, CNSC staff will continue to reach out with offers to meet and conduct additional consultation and engagement activities throughout the EA process with ERFN. As an Indigenous group with interest in this project, the CNSC is interested in hearing any views you may have with respect to the project. The CNSC encourages you, throughout the EA process and including but not limited to the review and comment periods, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns;

- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures; and
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project.

In addition, the CNSC will be making funding available to support ERFN's participation throughout the EA process through the CNSC's Participant Funding Program (PFP).

The first phase of PFP, for the review of the draft EIS, will be announced by May of 2021. The CNSC will be offering funding, to be disbursed among all eligible applicants, to help in the review of the draft EIS. A second phase of PFP will be announced at a later date, to help in the review of the EA report and CMD, and to prepare an intervention for an EA hearing. Please note that should additional funding be needed by ERFN, beyond the funding that will be awarded through these PFP opportunities, requests or applications for additional funding will be considered by the CNSC on a case-by-case basis.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process for the Participant Funding Program: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>. If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccpsn@canada.ca.

If you have any questions relating to this project during the EA process, or would like to discuss organizing a meeting with CNSC staff, please contact me by phone at 343-551-4196 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,

Marcelle Phaneuf

Marcelle Phaneuf
Environmental Assessment Officer, Environmental Assessment Division
Canadian Nuclear Safety Commission

c.c.: C. Campbell, ERFN
P. Fundarek, N. Kwamena, C. Cattrysse, S. Akhter, R. Froess, A. Zenobi, CNSC
A. Sadik, B. England, SEASB

From: [Froess, Ryan \(CNSC/CCSN\)](#)
To: cheyenna.campbell@desnedhe.com; jerry.bernard@erfn.net; jamie.dickson@desnedhe.com; irene.apesis@erfn.net;
Cc: [Phaneuf, Marcelle \(CNSC/CCSN\)](#); [Adam Zenobi \(CNSC/CCSN\)](#) (adam.zenobi@canada.ca);
Subject: Denison Wheeler River Project and Next Steps
Sent: 2021-03-26 3:22:00 PM

Good afternoon Chief Bernard and Mrs. Campbell,

I am following up on a letter that was sent by the CNSC to English River First Nation (ERFN) on February 15th, 2021, regarding the Wheeler River Project (the Project) proposed by Denison Mines Corp, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The purpose of the letter was to inform ERFN that Denison had notified the CNSC that they had resumed Environmental Assessment (EA) activities related to the Project.

I am reaching out on behalf of myself and Marcelle Phaneuf (EA specialist responsible for the proposed project at the CNSC). The CNSC would like to meet with ERFN to provide an update on the status of the proposed Project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including consultation and engagement activities with ERFN by the CNSC throughout the EA process. As an Indigenous Nation with direct interest in this project, the CNSC is interested in hearing any views you may have with respect to the project including but not limited too the following:

- any adverse impacts the project may have on your Nation's potential and/or established Indigenous and/or treaty rights;
- how specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated;
- opportunities to provide Indigenous knowledge to support determination of potential impacts and potential mitigation measures;
- advise the CNSC of how your Nation would like to be consulted by the Crown as part of the regulatory review process for this project (e.g. opportunity to work together to develop a Terms of Reference or plan for consultation for the Wheeler River Project EA and through the regulatory process).

In addition, as outlined in the letter the CNSC will be making funding available to support ERFN's participation throughout the EA process through the CNSC's Participant Funding Program (PFP). The first phase of PFP, for the review of the draft EIS, will be announced by late Spring of 2021.

The CNSC is committed to building meaningful and long-term relationships with ERFN. We would like to propose to set up a meeting with ERFN in the spring of 2021 to discuss next steps in the EA and consultation process, opportunities to collaborate early on in the EA process, and understand how the project may impact ERFN's rights and interests.

We (are flexible and are looking forward to meeting virtually) on dates that work best for your Nation.

Thank you,

Ryan Froess
Senior Policy Advisor, Policy, Aboriginal, and International Relations Division
Canadian Nuclear Safety Commission
ryan.froess@canada.ca | Cell: 306-914-7892

Conseiller Principal des Politiques, Division des Politiques et des Affaires autochtones et Internationales
Commission Canadienne de Sûreté Nucléaire
ryan.froess@canada.ca | Cell: 306-914-7892

Boser, Sydney

Subject: FW: ERFN / Denison Meeting
Location: <https://us02web.zoom.us/j/85796587036?pwd=MENnbzFqcndCMU4ya0Jsb0R1clg0QT09>
Start: Wed 2021-03-31 12:00 PM
End: Wed 2021-03-31 1:00 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Carolanne Inglis-McQuay

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

-----Original Appointment-----

From: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>

Sent: March 24, 2021 10:36 AM

To: Carolanne Inglis-McQuay; Jenny Wolverine; Brett Bradshaw; David Bronkhorst; Janna Switzer; Phaneuf, Marcelle; Sadik, Aimann ENV; England, Brianne ENV; Froess, Ryan

Subject: ERFN / Denison Meeting

When: March 31, 2021 12:00 PM-1:00 PM (UTC-06:00) Saskatchewan.

Where: <https://us02web.zoom.us/j/85796587036?pwd=MENnbzFqcndCMU4ya0Jsb0R1clg0QT09>

Carolanne Inglis-McQuay is inviting you to a scheduled Zoom meeting.

Topic: Denison Presentation with ERFN Leadership

Time: Mar 31, 2021 12:00 PM Saskatchewan

Join Zoom Meeting

<https://us02web.zoom.us/j/85796587036?pwd=MENnbzFqcndCMU4ya0Jsb0R1clg0QT09>

Meeting ID: 857 9658 7036

Passcode: 12345

One tap mobile

+15873281099,,85796587036#,,,,*12345# Canada

+16473744685,,85796587036#,,,,*12345# Canada

Dial by your location

+1 587 328 1099 Canada

+1 647 374 4685 Canada

+1 647 558 0588 Canada

+1 778 907 2071 Canada

+1 204 272 7920 Canada

+1 438 809 7799 Canada
+1 312 626 6799 US (Chicago)
+1 346 248 7799 US (Houston)
+1 669 900 6833 US (San Jose)
+1 929 205 6099 US (New York)
+1 253 215 8782 US (Tacoma)
+1 301 715 8592 US (Washington DC)
Meeting ID: 857 9658 7036
Passcode: 12345
Find your local number: <https://us02web.zoom.us/j/kpzZKRKk6>

Boser, Sydney

Subject: FW: HOLD: ERFN Virtual Meeting
Location: <https://us02web.zoom.us/j/88103422958?pwd=Yld3dmZXZXRGRQndYSTg2S09NYkNnZz09>
Start: Wed 2021-03-31 6:00 PM
End: Wed 2021-03-31 8:30 PM
Show Time As: Tentative
Recurrence: (none)
Meeting Status: Not yet responded
Organizer: Carolanne Inglis-McQuay

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

-----Original Appointment-----

From: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>

Sent: March 19, 2021 4:26 PM

To: Carolanne Inglis-McQuay; Chad Sorba; Xavier Lu Dac; Janna Switzer; David Bronkhorst; Brett Bradshaw; Michael Dawe; Kara Wolfe; Phaneuf, Marcelle; Froess, Ryan; Sadik, Aimann ENV; Dereniwski, Jeff ENV; England, Brianne ENV

Cc: Jennifer Skilnick; Dana Harris

Subject: HOLD: ERFN Virtual Meeting

When: March 31, 2021 6:00 PM-8:30 PM (UTC-06:00) Saskatchewan.

Where: <https://us02web.zoom.us/j/88103422958?pwd=Yld3dmZXZXRGRQndYSTg2S09NYkNnZz09>

Carolanne Inglis-McQuay is inviting you to a scheduled Zoom meeting.

Topic: Community Meeting with ERFN and Denison

Time: Mar 31, 2021 06:00 PM Saskatchewan

Join Zoom Meeting

<https://us02web.zoom.us/j/88103422958?pwd=Yld3dmZXZXRGRQndYSTg2S09NYkNnZz09>

Meeting ID: 881 0342 2958

Passcode: 12345

One tap mobile

+16475580588,,88103422958#,,,,*12345# Canada

+17789072071,,88103422958#,,,,*12345# Canada

Dial by your location

+1 647 558 0588 Canada

+1 778 907 2071 Canada

+1 204 272 7920 Canada

+1 438 809 7799 Canada

+1 587 328 1099 Canada
+1 647 374 4685 Canada
+1 669 900 6833 US (San Jose)
+1 929 205 6099 US (New York)
+1 253 215 8782 US (Tacoma)
+1 301 715 8592 US (Washington DC)
+1 312 626 6799 US (Chicago)
+1 346 248 7799 US (Houston)
Meeting ID: 881 0342 2958
Passcode: 12345
Find your local number: <https://us02web.zoom.us/j/88103422958>

Summary of Meeting with English River First Nation and Canadian Nuclear Safety Commission

June 8th, 2021 – 2:00 pm to 3:30 pm CST

Location: TEAMS meeting

Attendees:

<i>Canadian Nuclear Safety Commission (CNSC)</i>	<i>English River First Nation (ERFN)</i>
Adam Levine, Team Lead, Indigenous Relations	Cheyenna Campbell – ERFN Lands Manager
Ryan Froess, Senior Advisor, Indigenous Relations	Jessica Ward – Shared Values Solutions (SVS)
Marcelle Phaneuf, Environmental Specialist, EAD	

Related documents:

Agenda – Meeting #1 – June 8th, 2021.

Introductions – CNSC (Denison EA) and ERFN

ERFN - Update on the Denison Wheeler River Project

CNSC - Update on the Denison Wheeler River Project

CNSC/ERFN - Opportunities for collaboration (ToR, Rights Impacts Assessment, federal/provincial review team, PFP other)

Next Monthly Meeting #2 - July 13th, 2021 – Topics of Interest and Action Items from Meeting #1

EDOCs #6471800 and #6515310 sent as attachments for ERFN for future discussion. EDOC # 6579232 was the CNSC presentation that was sent to ERFN and discussed during the meeting.

Purpose: Meeting between the CNSC and ERFN to discuss the Environmental Assessment for Denison's proposed Wheeler River Project. Initial meeting was to discuss potential opportunities for the CNSC and ERFN to collaborate and work together and to discuss consultation approach on the Denison's Wheeler River Project and continue to build upon and strengthen the relationship between the CNSC and ERFN.

Topics Discussed:

1. ERFN Update on Denison's Wheeler River Project

Cheyenna provided the group with an update on the work that has been taking place with Denison on the EA and what is currently planned moving forward including:

- Traditional Knowledge/Traditional Land Use Study (TK/TLUS) study – call for consultants is going out soon and will be working with community members including elders, youth, others to discuss traditional and current resource use in the Denison Wheeler River area and region. A report will be produced for Denison and incorporated into the Draft EIS.

- Socio-economic study – Study will include a baseline understanding of the current socio-economic conditions that currently exist with ERFN and their communities and hope to work with a number of community members on the study.
- Review of Draft EIS – Will be completed by SVS and ERFN.

Shared Values Solutions is working with ERFN on the Wheeler River Project through the EA process and ERFN will be helping to co-draft components/sections of the EA with Denison.

CNSC/ERFN - There was a discussion about confidentiality of the TK/TLUS study and who will own the final product that is being completed and how or if it might be shared? There are many ways of going about it including confidential clauses or only sharing portions of it. CNSC staff confirmed that the CNSC has mechanisms to ensure the confidentiality of any sensitive information shared by ERFN.

CNSC – It is important for CNSC staff’s consultation process for ERFN to share the TK/TLUS as early as possible with the CNSC so we can work together to better understand how ERFN rights and interests may be potentially impacted by the proposed project and if so how they can best be mitigated and potentially accommodated.

SVS –ERFN’s current plan is to share the final TK/TLUS report with the community and then the report would be utilized by Denison and incorporated into the EA.

2. CNSC Update on Denison’s Wheeler River Project

- Brief update on the EA process was provided as well as timelines on where the project was at in the process. Denison has communicated to CNSC the Draft EIS should be completed in Q1 or early Q2 of 2022. EA hearing before the commission could be 2-3 years from now so we do have time but it is great to have all of the discussions early on within the process and there is a lot of work we can do collaboratively (if interested) if we start early.
- Marcelle briefly touched on the difference in the CNSC consultation process and some of the differences’ between the provincial consultation process.
- CNSC shared some documents (EDOCs #6471800 and 655310) with ERFN for future discussion on the CNSC expectations of the proponent that they will need to fulfill.
- Cheyenna asked about what opportunities the CNSC may be able to offer and have available to work together on the Denison Wheeler River EA process.

3. CNSC/ERFN - Opportunities for collaboration (ToR, Rights Impacts Assessment, federal/provincial review team, PFP, other)

- **Terms of reference (ToR)** - CNSC staff and ERFN had a discussion on a possible ToR for consultation on the project and other options available. ERFN expressed an interest in developing a ToR for consultation with the CNSC for the project and EA process. CNSC to share ToR template and both parties can work on together over the next few months to develop one for the Denison project.
- **Federal - Provincial review team** – If ERFN is interested there are also is the opportunity of having one member of the ERFN team who participates in the Federal - Provincial EA review team alongside other experts from other departments such as Health Canada, Department of Fisheries and Oceans , Transport Canada , the Province of Saskatchewan, Saskatchewan Health Authority

and others. The expectation is that the ERFN representative would work as part of the team and would provide expertise in the area of ERFN rights and interests. This is also something we can discuss as part of future monthly meetings.

- **Rights Impact Assessment (RIA)** – Adam talked about CNSC’s approach to RIA and offer for CNSC to work with ERFN to complete a RIA for the project if interested. CNSC staff’s approach to RIA has been benchmarked and modelled off the RIA methodology developed by the Impact Assessment Agency of Canada. CNSC is happy to come back and give a more detailed presentation on the topic at a later date should there be interest.

ERFN/CNSC General comments –ERFN noted that this is a great start and there are a lot of options for consultation on the project and ERFN is interested but there is a lot of information and ERFN will need time to digest what was discussed. ERFN and CNSC will discuss a path forward as part of upcoming meetings.**Action 1:** CNSC (Ryan) - Follow up with ERFN to send a template for ToR for the project, EA and consultation process t.

Action 2: CNSC/ERFN - Work together to Draft a ToR in summer of 2021 for the proposed Project.

4. Next Monthly Meeting #2 - July 13, 2021 – Topics/Presentations of Interest and Action Items from Meeting #1

Discussions occurred about the best approach to communicate and engage with ERFN membership and broader community going forward as well as next steps for working on the EA.

Marcelle talked about the opportunity in the future for CNSC staff to travel and present to ERFN leadership and community members about who the CNSC is, our role as the regulator and learn more about any concerns the Nation may have (when the COVID - 19 travel restrictions allow CNSC staff to travel). CNSC staff would like to visit the community ideally a few times throughout the EA process. Once the Draft EIS is received from Denison, CNSC would like to meet with ERFN leadership, the community, youth, and elders to hear their concerns and validate what was written in the Draft EIS and once the CNSC staff’s EA Report is completed to come back and present the results of the EA Report to the community.

Action 4: CNSC to share the phase 1 PFP opportunity once released. This phase pf funding will cover the Draft EIS comment period, and related consultation activities. Additional funding opportunities will also be made available including support for the Drafting/implementation of the ToR, and support for the participation in the later phases of the EA process including the review of the CNSC staff’s EA Report, Commission Member Document and participation in the Commission hearing.

Follow-up Actions:

Actions Items	Response/Proposed Dates
1. CNSC (Ryan) - Follow up with ERFN to send a template for ToR for the project	CNSC will send week of June 21 st
2. CNSC staff and ERFN to work to Draft a ToR for consultation on the Project and EA process.	Summer 2021
3. CNSC/ERFN will continue to meet on a monthly basis and will have a deeper discussion on the	Summer to early fall 2021

Federal Provincial Review Team (FPRT) and RIA process at the next regular meeting.	
4. CNSC to share PFP opportunities for the EA and consultation processes once available .	Ongoing as opportunities and needs arise.



Wheeler River Project and Rook I Project

Environmental Assessment (EA) Process Overview and Indigenous participation





Agenda

1. Introduction
 - Wheeler River Project
 - Rook I Project
2. CEAA 2012 EA Process
3. Timelines
 - EA Timelines
 - Wheeler River Project Timelines
 - Rook I Project Timelines
4. Indigenous Consultation in the EA Process
5. Questions



Wheeler River Project

- Joint venture project owned by Denison Mines Corp and JCU Canada Exploration Company Ltd.
- Proposed uranium mine and processing plant in the eastern area of the Athabasca Basin region
- *In situ* recovery mining process and precipitation processing plants
- Closed loop process reusing water from precipitation process to inject into *in situ* recovery mining



Rook I Project

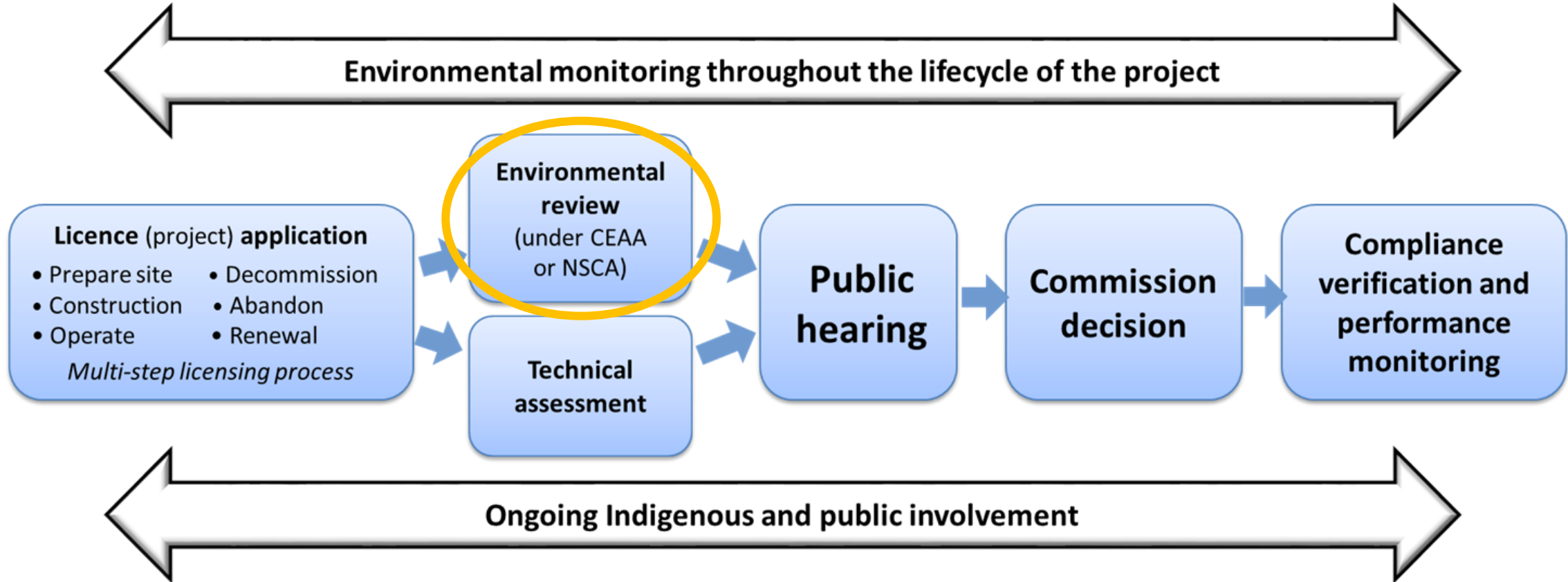
- Owned by NexGen Energy Ltd.
- Proposed uranium mine and mill development in the southwestern area of Athabasca Basin region
- Underground and surface facilities to support mining and processing of uranium ore
 - Underground mining
 - On-site milling
 - Surface facilities for storage of waste
 - Underground tailings management facility
 - Effluent treatment centre



Environmental Assessment Process

CEAA 2012 Environmental Assessments

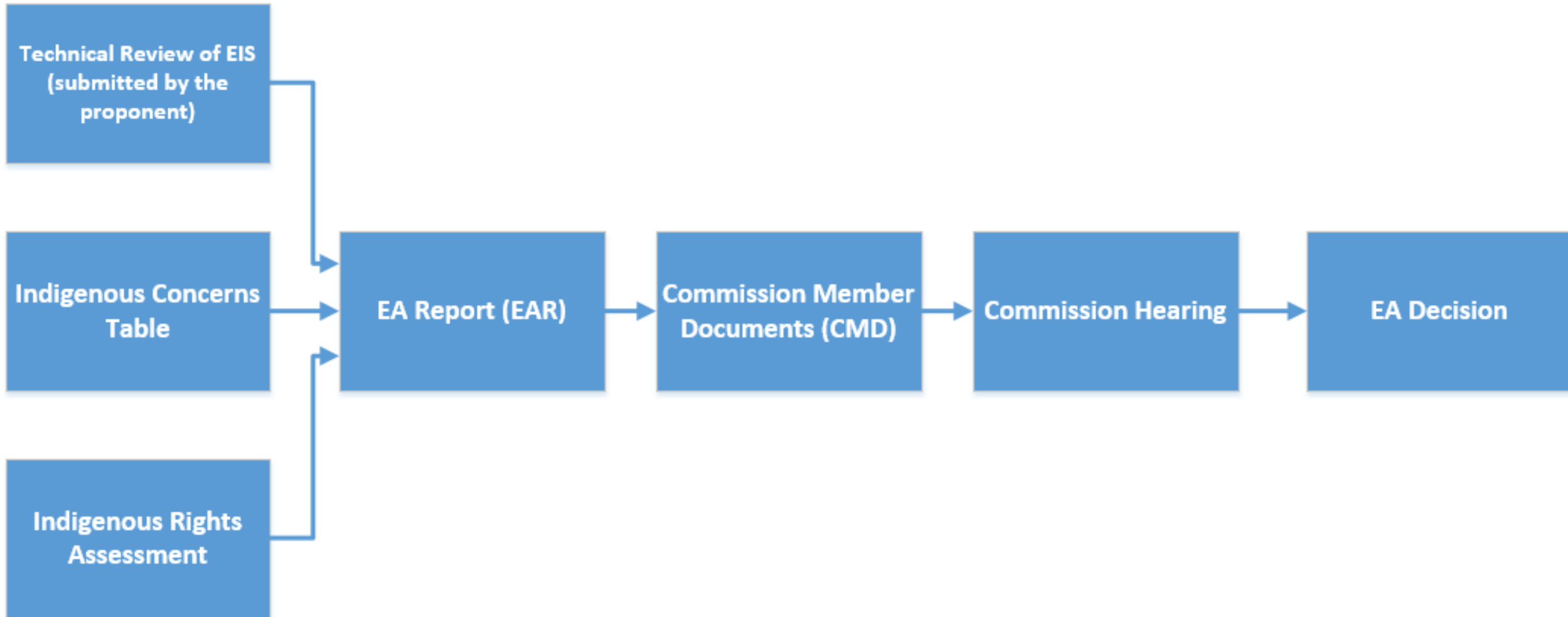
Environmental Protection Framework



Proponents must demonstrate that they have made adequate provisions for the protection and health and safety of people and the environment



Outputs of the EA process





Environmental Assessment Process Timelines

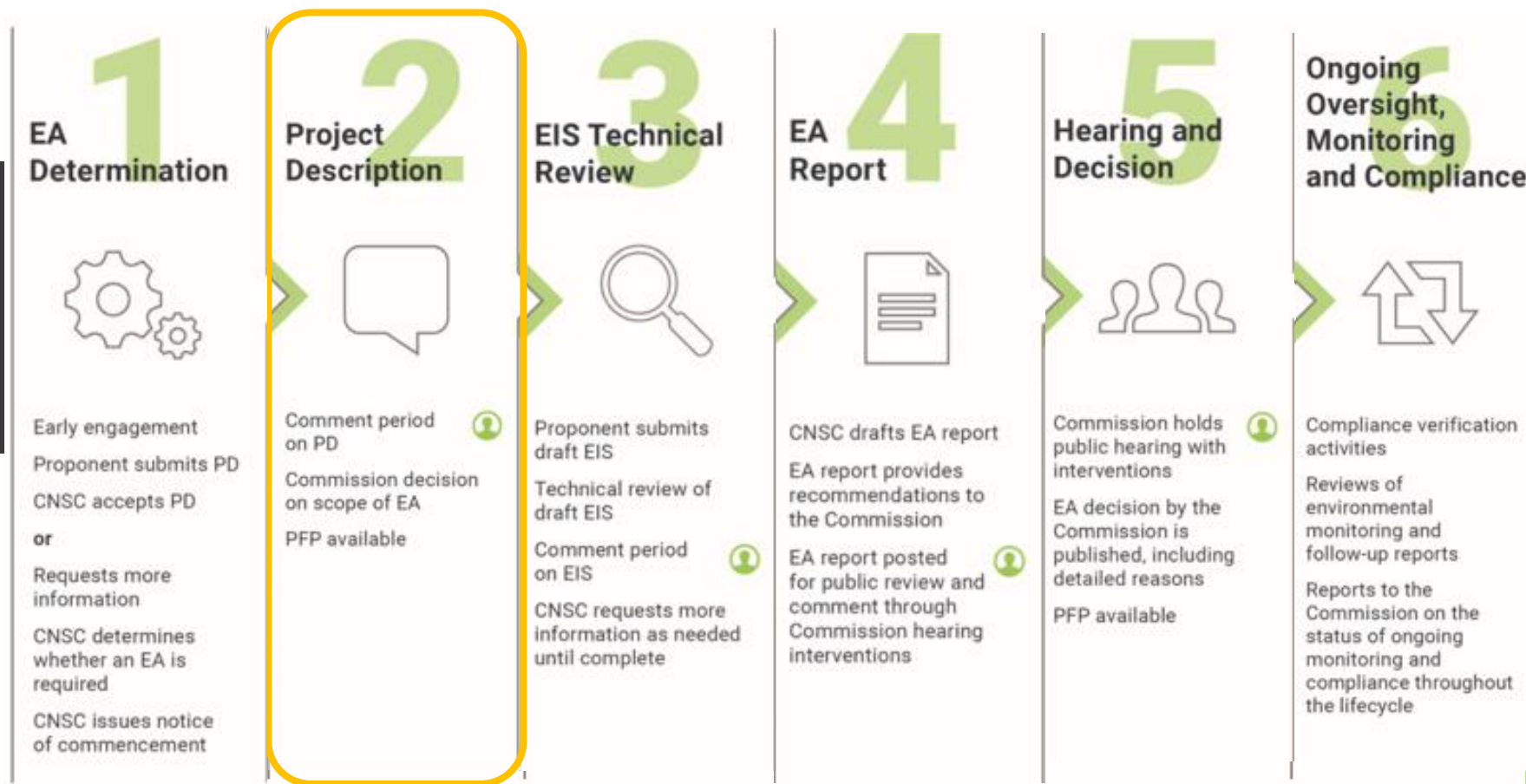


Environmental Assessment Process

Canadian Environmental Assessment Act, 2012

Legend

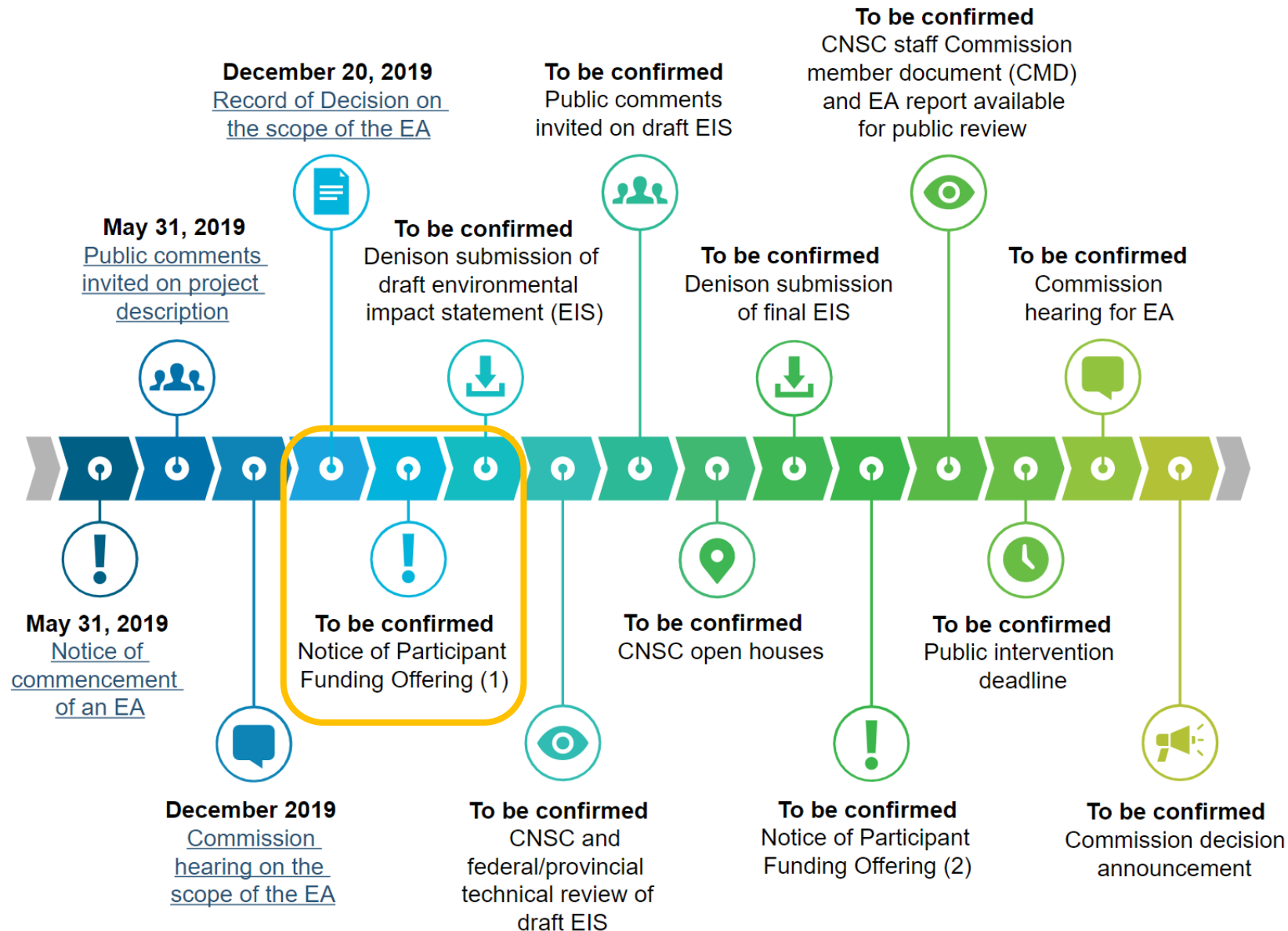
EA: Environmental Impact Assessment
PD: Project Description
EIS: Environmental Impact Statement
PFP: Participant Funding Program
👤 : Formal Participation Opportunity



Ongoing public engagement and Indigenous Consultation throughout the EA Process

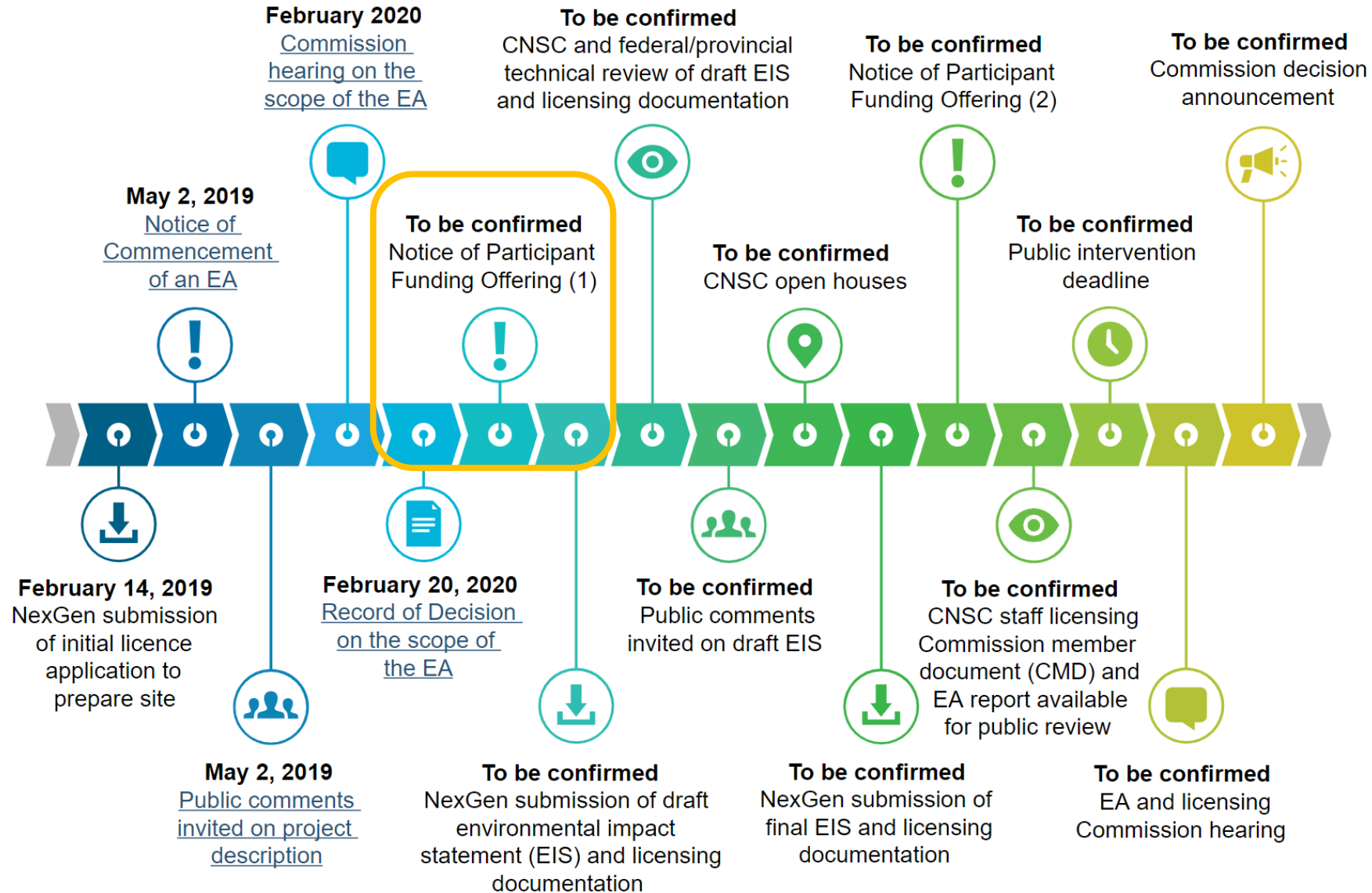


Wheeler River Project





Rook I Project





CEAA 2012 EA Process Indigenous Consultation



Indigenous Engagement and Consultation

Engagement

- CNSC requires licensees to engage with potentially affected Indigenous peoples early in the development and throughout the life of their project

Consultation

- As an agent of the Crown, CNSC consults with potentially impacted Indigenous peoples to understand and address potential impacts to Indigenous and/or treaty rights from a project
- CNSC leads a whole-of-government approach to improve the efficiency/effectiveness of engagement and consultation processes

Building long-term positive and trusted relationships with Indigenous peoples in Canada

Importance of Indigenous Participation in the EA Process

***Incorporate
traditional
knowledge***

Understand the effects and potential impacts of the project on potential or established Indigenous or Treaty Rights

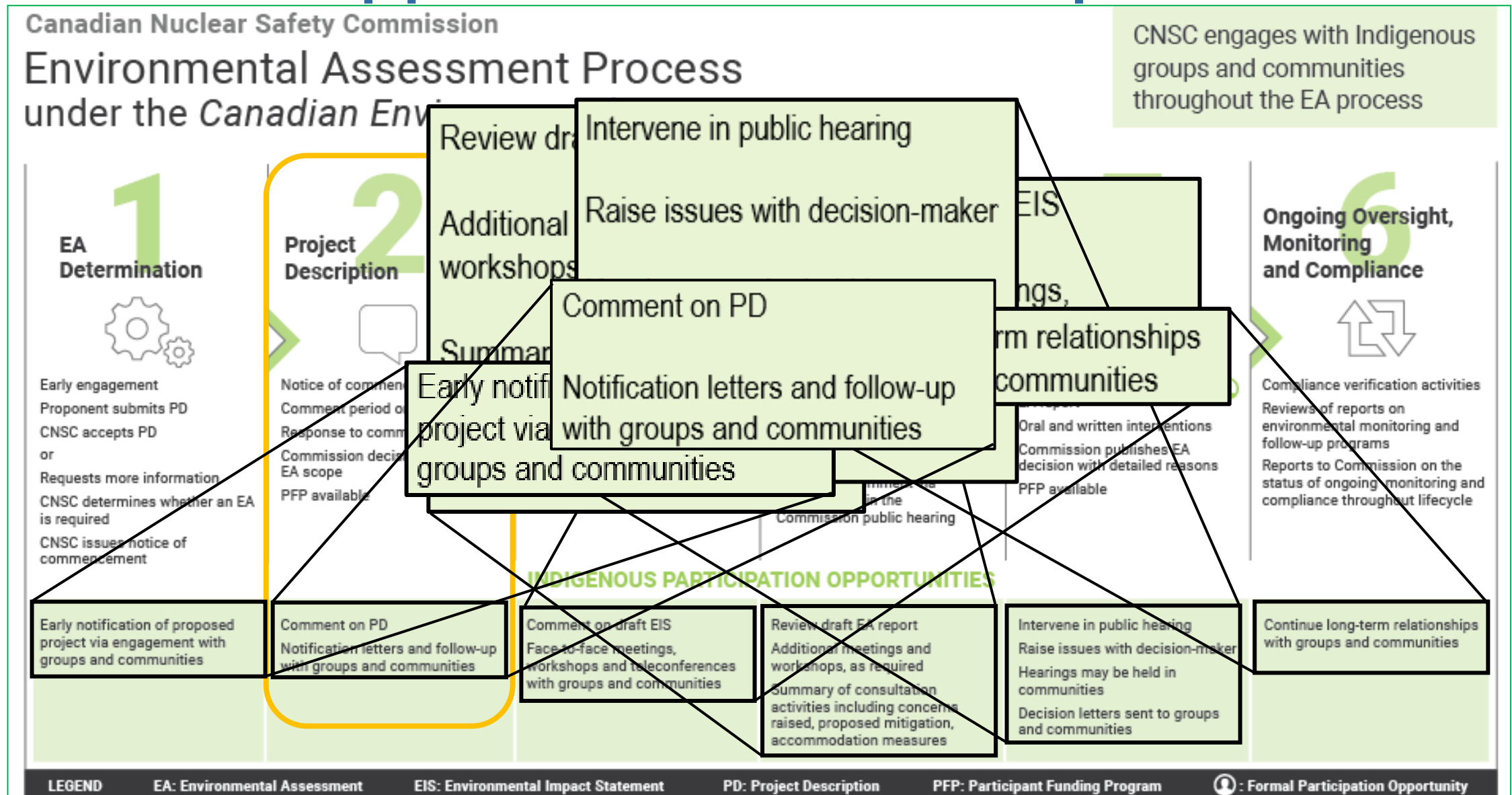
Ensure mitigation and accommodation is considered to address effects and potential impacts

Determine significance of adverse effects

The CNSC looks at potential impacts on the ability to exercise potential and established Indigenous and Treaty Rights in the future, should the project be allowed to proceed.



Opportunities to Participate



Indigenous Participation in the EA Process and EA Report

CNSC offers the following to potentially impacted indigenous groups:

- Regular correspondence and meetings to provide project updates throughout
- Completion of Traditional Knowledge and Land Use Studies
- Public comment periods (on the project description, draft EIS)
- Signing of Terms of References for consultation (if desired)
- Consultation on CEAA 2012 section 5(1)(c) effects due to the project
- Issues and Concerns Tables
- Participation on the Federal and Provincial Review Team for the draft EIS
- Review of relevant sections of the EA Report
- Review of Rights Impact Assessments for the MNS

Funding is available for the activities listed above



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

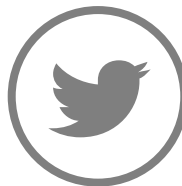
Canada

Connect With Us

Thank You! Questions?



nuclearsafety.gc.ca



Summary of Meeting with English River First Nation and Canadian Nuclear Safety Commission

September 21st, 2021 – 2:00 pm to 3:30 pm CST

Location: TEAMS meeting

Attendees:

<i>Canadian Nuclear Safety Commission (CNSC)</i>	<i>English River First Nation (ERFN)</i>
Jessica Wray – Senior Officer, Indigenous Relations Ryan Froess, Senior Advisor, Indigenous Relations Marcelle Phaneuf, Environmental Specialist, EAD Wish Yen , Environment Officer, EAD	Cheyenna Campbell – ERFN Lands Manager

Related documents:

Agenda – Meeting #3 – September 21st 2021.

ERFN - Update on the Denison Wheeler River Project

CNSC - Update on the Denison Wheeler River Project

CNSC/ERFN - Opportunities for collaboration (Terms of Reference (ToR), Rights Impacts Assessment (RIA), Federal/Provincial Review Team, Participant Funding Program (PFP), other)

EDOC # 6595602 was the ToR that was sent to ERFN and discussed during the meeting.

Purpose: Meeting between the CNSC and ERFN to discuss the Environmental Assessment for Denison's proposed Wheeler River Project. Initial meeting was to discuss potential opportunities for the CNSC and ERFN to collaborate and work together and to discuss consultation approach on the Denison's Wheeler River Project and continue to build upon and strengthen the relationship between the CNSC and ERFN.

Topics Discussed:

ERFN - Update on the Denison Wheeler River Project

1. ERFN (Cheyenna) - Meeting with Denison moved to September 22nd, but to date, engagement with Denison has been positive and seems effective
2. CEAA 2012 and Legal Requirements discussion
 - CNSC cannot hold a proponent to the IAA 2019 standards legally, but the expectations are CEAA 2012 and above.
 - Denison has relayed to ERFN that they're aiming to achieve IAA 2019 standards, and although CNSC cannot confirm that Denison is actually attaining the standards of IAA 2019 as there are no written submissions, Denison's efforts to engage are evident

through meetings with ERFN, MN-S and the Ya' Thi Néné, Denison appears to be striving to reach the standards of the IAA 2019.

3. CNSC Staff (unless otherwise stated) - Rights Impact Assessment (RIA)

- Both the EA and licensing processes triggers Duty to Consult – the CNSC prepares the RIA, Issues and Concerns tables as part of this process.
- CNSC conducts the RIA process separately from the proponent – the RIA highlights and summarizes all consultation work completed with Indigenous groups
 - ERFN's impact assessment would be co-drafted with the CNSC
 - The RIA does not go to the proponent until the EA report is published, as an appended section of the EA report
- Impact assessment could be longer due to the historical and more prioritized land use by the ERFN
 - Cheyenna – If ERFN has a stronger land claim than the MN-S or the Ya'Thi Néné will this will be captured in the RIA? They are interested in the prioritization of their interests in comparison with the MN-S or the Ya'Thi Néné by both CNSC and Denison.
- ERFN is welcome to share with Denison any information related to the RIA, nothing is privileged for CNSC. The only privacy concern for CNSC is to protect the information ERFN shares with the CNSC.
- Denison commitments through the EA or licensing process
 - CNSC can play a facilitator role between ERFN and Denison if needed. Role could include analysis of mitigation measures, follow-up monitoring (IEMP) etc.
 - The CNSC will hold Denison to account for commitments, but there are justifiable infringements
 - Example – BC provincial projects – Caribou (SERA listed) impacts require negotiations with various communities to ensure impacts are acceptable to all parties, some parties may be more directly impacted than others. In this scenario, different commitments were negotiated with each individual group.
- Collective rights to hunt, fish and harvest are currently listed for the community, but if one individual could be impacted, would that person be considered in the RIA?
 - Example – Lone-trapper from ERFN impacted by the project, would he be represented? This trapper would be a representative of the collective of the ERFN. The CNSC works to protect the trapper's rights under CEAA 2012 section 5(1)(c) and the collective rights of the Nations.
- ERFN (Cheyenna) - It is imperative that Cree Lake and Wheeler River systems are protected to ensure members of the ERFN are not impacted.
- In the RIA, non-Indigenous persons would only be analyzed for human health impacts. They do not have legal rights to trapping, hunting, fishing and would not be analyzed for these impacts.
- Interventions at a hearing do not have legal bearing/weight on the Commission's decision

4. EA Process

- Once the EIS is submitted and all information requests (IRs) have been adequately addressed, the technical review will trigger. A 60 day window in the technical review with PFP available to complete this process. The technical review gives the ERFN an

opportunity to participate. The goal is to submit IRs to the proponent to fill gaps, verify accuracy and provide technical knowledge.

- ERFN will be able to apply for PFP to hire a consultant for the RIA – Cheyenna has confirmed they would like to participate in this process.
- RIA Process
 - 1) Identify impacts that could/may occur
 - 2) Determine the impact – significance to the ERFN
 - 3) Quantify the impact on the ERFN
- Timeline for RIA
 - Denison is aiming to submit the EIS in Q2 of 2022 (June 2022)
 - EIS review is anticipated to take a year – this is including the review of IRs
 - RIA is slated to be completed in the next 20 months
- ERFN (Cheyenna) Denison has pulled some socio-economic data from desktop studies from the census, and in confirmation meetings with ERFN, it was not accurate. The data pulled does not represent the community because no one updates the data.
 - Denison will rely on and integrate the socio-economic reports from the community to fill in gaps for the project

5. Introduction/Refresher of the CNSC and our Role

- Cheyenna - A plain language executive summary of the RIA translated for elders and members of the ERFN to understand would be ideal. This would provide reassurance to the community and it is necessary to provide this document to the community to ensure it is understandable
 - Necessary to ensure community is aware that moose can be hunted, berries won't be contaminated, and all Rights will remain unchanged and manage the impacts to rights
 - It is imperative that Cree Lake and Wheeler River systems are protected
- CNSC would be happy to participate and provide information on the process to the community when it is safe to do so or possibly virtually if we have too.
 - ERFN Participants (all Cheyenna)
 - ERFN has a collection of family heads to participate and disseminate to their families to ensure the information dissemination is less daunting. Community consultation groups tend to have a negative attitude with no particular comments that are applicable to the project.
 - Chief and council, elders, Cheyenna, legal counsel of the ERFN and possibly consultants would be something they would be interested in.
 - A meeting on the CNSC and the role of the CNSC as a neutral regulator would be ideal
 - A plan could be to present in Saskatoon due to outbreaks of COVID within northern communities.
 - Ryan could assist with booking at Wanuskewin (Indigenous historical site in Saskatoon)
 - Virtual meeting for the Fall to do introductions, but in-person meetings/collaboration would be ideal down the line
 - Consideration of a virtual or in-person ceremony for the signing of the ToR?

- IBA – a clause in the IBA is to not oppose licensing – ERFN currently has an IBA with Denison

6. PFP

- Adam Zenobi will provide guidance on PFP applications and requests as they come out or we begin to work together through the TOR.
- Funds are flexible and can be shifted from EIS funding for the TOR or meetings
- The PFP is covered over three fiscal years and if funds are not available, they could become available down the line

Upcoming CNSC events

- McClean Lake Commission Hearing on 4th of October will be held virtually.
- UMMD ROR 8th of Oct – not sufficient funds (funding was provided for the ROR review) – Norman and Isadora → will have an elder provide opening and closing session.

Next Monthly meeting – October 12, 2021

- Next meeting will focus on the ToR, signing and the path forward towards implementation of the ToR.

Follow-up Actions:

Actions Items	Response/Proposed Dates
1. CNSC (Marcelle) to provide updates on the ToR within the week (complete) and send to Cheyenna for review.	CNSC completed - September 23 rd
2. CNSC/ERFN will continue to meet on a monthly basis and will have a deeper discussion on the Federal Provincial Review Team (FPRT) and RIA process and implementation of the ToR once signed.	Fall/Winter 2021
3. CNSC to share PFP opportunities for the EA and consultation processes once available.	Ongoing as opportunities and needs arise for the project and in the ToR.

Boser, Sydney

From: Froess, Ryan
Sent: October 13, 2021 10:36 AM
To: Cheyenna Campbell
Cc: Phaneuf, Marcelle; Adam Levine (adam.levine@cnscccsn.gc.ca); Wish Yen (wish.yen@cnscccsn.gc.ca)
Subject: RE: CNSC Terms of Reference review
Attachments: E-DOCS-#6658273-v1-Meeting_Minutes_CNSC-ERFN_Sept_21_2021.DOCX.DRF; E-DOCS-#6595602-v3-DRAFT-_Terms_of_Reference_between_ERFN_and_CNSC_for_Denison_Wheeler_River_Project_docx_June_2021.DOCX.DRF
Categories: Denison

Good morning Cheyenna,

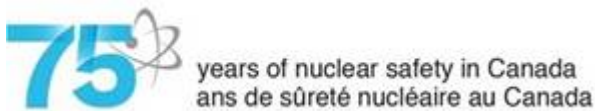
As discussed yesterday I have pushed our October monthly meeting back until October 26th and then adjusted our schedule to monthly there after.

I have attached the meeting notes from our September 21st meeting – let me know if you alright with these or if you had any changes?

Finally, its great to hear that ERFN and CNSC are both committed to signing the ToR and working together in collaboration on Denison's Wheeler River Project. I have attached the last version we last sent with CNSC responses to ERFN comments on September 23rd. I will clean this version up and send over the Final ToR version this week if you have no further comments/questions. We can move on to the signing, depending on how ERFN decides they want to proceed for our next monthly meeting if you would like and then begin the next steps of working on the implementation of the ToR together if that works? Let us know how you would like to proceed with signing and we would be happy to coordinate.

Thanks again and give me a call if you have any questions.

Ryan Froess
Senior Policy Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892



From: Froess, Ryan
Sent: September 22, 2021 11:54 AM
To: Cheyenna Campbell <cheyenna.campbell@desnedhe.com>
Cc: Phaneuf, Marcelle <marcelle.phaneuf@cnscccsn.gc.ca>; Adam Levine (adam.levine@cnscccsn.gc.ca) <adam.levine@cnscccsn.gc.ca>; Wish Yen (wish.yen@cnscccsn.gc.ca) <wish.yen@cnscccsn.gc.ca>
Subject: RE: CNSC Terms of Reference review

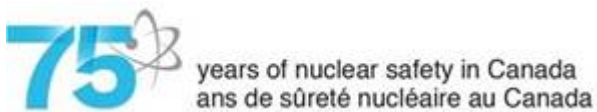
Good morning Cheyenna,

Thanks for the meeting yesterday and great questions on RIA and discussion on the ToR for the Wheeler River Project. As we move through the EA process I am sure ERFN will have many more questions for the CNSC and we are always happy answer them. We are looking forward to meeting with the Chief, Council, and Elders when the timing is right to explain who the CNSC is, the EA process, and share how ERFN and CNSC plan to work collaboratively on the Wheeler River Project if you would like.

We have provided some responses to the ERFN comments in the ToR as we discussed yesterday. If you can confirm ERFN is in agreement and perhaps send any others you need for final review that would much appreciated! We can move on to the signing, depending on how ERFN decides they want to proceed when you feel is appropriate and then begin the next steps of working on the implementation of the ToR together.

Thanks again and as always don't hesitate to contact me or give me a call if you have any questions!

Ryan Froess
Senior Policy Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892



From: Cheyenna Campbell <cheyenna.campbell@desnedhe.com>
Sent: September 21, 2021 10:29 AM
To: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: FW: CNSC Terms of Reference review

Hi Ryan!

Larry was able to take a look at the TOR . I have attached his comments for your review. Please fwd to your team.

Chat this afternoon.

Chey.

Sent from my cell phone. Please excuse brevity, auto-correct, and spelling errors.

----- Original message -----

From: Larry Innes <LInnes@oktlaw.com>
Date: 2021-09-21 8:09 a.m. (GMT-06:00)
To: Cheyenna Campbell <cheyenna.campbell@desnedhe.com>
Cc: Jamie Dickson <jamie.dickson@desnedhe.com>
Subject: Re: CNSC Terms of Reference review

Hey Chey –

I was out chasing caribou last week, so you likely got my autoreply, but I've done a mark-up on the TOR for your review – hopefully this comes in time to be useful.

See what you think – happy to chat about any of it

From: [Phaneuf, Marcelle](#)
To: [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](mailto:Cheyenna.Campbell@desnedhe.com)
Cc: [Froess, Ryan](#)
Subject: Signed copy of Terms of Reference
Attachments: [E-DOCS-#6700787-v1-FINAL_Terms_of_Reference_between_ERFN_and_CNCS_for_Denison_Wheeler_River_Project_docx_December_2021_Signed.PDF](#)
Sent: 2021-12-13 3:52:00 PM

Dear Cheyenna,

Please find attached the Terms of Reference between the CNSC and English River First Nation, signed by both Chief Bernard and Haidy Tadros.

I look forward to exciting and innovative collaboration with you and English River on the Wheeler River project!

Best regards,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Specialist, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@cnsccsn.gc.ca / Tel: 343-551-4196

Spécialiste en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@cnsccsn.gc.ca / Tél : 343-551-4196



years of nuclear safety in Canada
ans de sûreté nucléaire au Canada

**Terms for Consultation and Assessment Activities between
Canadian Nuclear Safety Commission (CNSC) and English River
First Nation (ERFN)**

(individually a “participant” and collectively the “participants”)

in respect of the Denison’s Wheeler River Project

December 2021

1. Participants Involved and Areas of Interest

English River First Nation (“ERFN”) on behalf of its community members, has identified concerns and areas of interest with respect to the Wheeler River (“Project”) submitted by Denison Mines Corp. (“Denison”). These include the potential for the Project’s construction and ongoing operations to impact on ERFN’s Aboriginal and Treaty rights, interests, culture, or traditional uses, ongoing community use of and reliance on the Project area and areas in the vicinity of the Project, and the ERFN Peoples’ long-term cultural relationship to and connection with the Wheeler River area.

The Canadian Nuclear Safety Commission (“CNSC” or “Commission”) is mandated to regulate the use of nuclear energy and materials to prevent unreasonable risk to health, safety, security, and the environment; to implement Canada’s international commitments on the peaceful use of nuclear energy; and to disseminate objective scientific, technical, and regulatory information to the public. As an agent of the Government of Canada and as Canada’s nuclear regulator, the CNSC recognizes its responsibility to uphold the honour of the Crown and meet its duty to consult with and, where appropriate, accommodate the interests of ERFN when its decisions could potentially affect ERFN’s Aboriginal and Treaty rights, interests, culture, or traditional uses.

The participants have expressed an interest in developing an ongoing working relationship that will support the participants in attending to their respective roles and responsibilities in respect of the Project and strengthening the participants’ ongoing relationship that is needed over the life-cycle of the Project if approved.

2. Vision

ERFN and CNSC are committed to the establishment of a meaningful and collaborative approach in respect of the consultation obligations, regulatory review and assessment

processes, and life-cycle oversight and monitoring for the Project. The participants are committed to strengthening their ongoing relationship that is needed over the life cycle of the Project if approved.

3. Objectives

These Terms of Reference create a framework and affirm the commitment of the participants to work cooperatively in the federal environmental assessment (“EA”) process for the Project.

The objectives of this Terms of Reference are to provide procedures and principles that:

- Provide clarity on the roles and responsibilities of the participants;
- Affirm the participants’ commitment to ongoing, respectful, and open communication – i.e., the participants involved come to the table with a view to finding solutions, are open, listen and respect one another’s views;
- Establish a framework for consultation and collaborative assessment that is responsive and flexible so that new information in respect of the significance of potential Project effects on ERFN’s Aboriginal and Treaty rights, interests, culture, and traditional uses, is properly understood and considered in the federal EA process, in accordance with federal and ERFN guidance; and,
- Establish a framework for the participants’ collaboration and participation in the federal EA process in a timely and efficient manner.

For all collaborative steps in the federal EA process outlined below, ERFN and CNSC staff agree to use best and reasonable efforts to obtain common ground in addressing issues as they arise.

Limitations of the Agreement

The following collaborative steps are in addition to the existing participation opportunities (e.g., formal comment periods) that are offered throughout the CNSC’s regulatory review process and do not preclude ERFN’s participation in these activities. In addition, these collaborative steps are specific to the federal EA process and separate from the ongoing and parallel provincial EA process.

In addition, this agreement does not in any way limit ERFN in its ability to claim, defend, respond to, or intervene in, any court or other proceeding(s), in order to protect its Aboriginal and Treaty rights, interests, culture, or traditional uses.

The processes established within these Terms of Reference will not be implemented, interpreted, or construed, in a manner that would preclude the CNSC, as defined under the *Nuclear Safety and Control Act*, from exercising their legislative authority and, for greater clarity, shall in no way fetter the exercise of any discretionary authority granted under the laws of Canada or in any way exempt the CNSC from fulfilling constitutional obligations to consult and where necessary, accommodate ERFN in accordance with the Honour of the Crown.

4. Technical Review of the Draft EIS Submission

Scope

An appointed representative (as selected by and acting on behalf of ERFN) will participate as part of the federal review team in the technical review of the draft environmental impact statement (“EIS”) submission. The federal review team (FRT) is made up of subject matter experts from federal departments and agencies with specific expertise for the project. As such, all members of the FRT, including the ERFN representative, are to review the material provided under a technical lens through the scope of their specific mandate. The ERFN representative in the FRT is a technical reviewer; their work does not include raising issues and concerns that ERFN or ERFN members have about the project. For greater clarity, the FRT is a technical working group, not a forum for s. 35 consultation.

The FRT takes part in all phases of the technical review of the draft EIS document and provides comments to the CNSC. The appointed ERFN representative will participate as a full member of the FRT, having the same rights and responsibilities as other team members. During the course of the technical review, each member of the FRT may request or participate in technical meetings between reviewers, the CNSC, and the proponent, in any combination thereof, to assist in their review. The CNSC will coordinate these meetings.

The FRT, including the appointed ERFN representative, may review the draft EIS submission for conformity with the [*Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012*](#). Once it is accepted, the FRT will then perform a technical review of the EIS. The ERFN representative will review the draft EIS submission within its scope, and provide written feedback to CNSC staff on whether there are any gaps with respect to incorporation of ERFN’s Traditional/ Indigenous Knowledge and land use information, evidence, as well as potential impacts of the Project on ERFN’s Aboriginal and Treaty rights, interests, culture, or traditional uses. Any information gaps identified will be

submitted as information requests (“IR”) to CNSC staff. It is to be noted that the ERFN representative is not to review any material in the EIS that ERFN collaboratively drafted or provided oversight in the drafting thereof with the proponent.

CNSC staff will compile all IRs from the FRT, and will submit a table of all comments within scope of the review to the proponent for response. This iterative process continues until all comments are addressed to the satisfaction of the CNSC in collaboration with the review team.

Key Principles

Consistent with the timelines for the federal review team, ERFN’s appointed representative will have up to 8 weeks to conduct the technical review of the draft EIS and provide written feedback to CNSC staff in the form of IRs.

5. Review of Responses to Information Requests

Scope

Upon receipt of Denison’s responses to IRs, the ERFN appointed representative will participate as part of the federal review team in the technical review of Denison’s IR responses. The ERFN representative will review the responses to those IRs they authored, and provide written feedback to CNSC staff on the sufficiency of information provided.

Key Principles

CNSC staff will take into consideration ERFN’s feedback and, if needed, discuss with the ERFN representative the adequacy and sufficiency of proponent responses to the identified IRs in ERFN’s purview prior to making a determination on the adequacy and sufficiency of information in the revised EIS submission.

6. Rights Impact Assessment Approach

CNSC staff and ERFN are committed to collaborating on and carrying out a thorough, evidence-based Rights Impact Assessment (“RIA”) for the Project.

The process for the RIA will be consistent with the Government of Canada’s commitments with respect to recognition, protection, and upholding of the rights of Indigenous peoples, including ERFN’s Aboriginal and Treaty rights.

The RIA is to be completed collaboratively between CNSC staff and ERFN. The process can include the participation of Denison where appropriate. ERFN and CNSC staff will seek to assess the adequacy of proposed measures, including follow-up and monitoring, and/or

any other measures proposed by Denison, the CNSC, the Province of Saskatchewan, or other Government organizations, to mitigate, avoid, or offset any identified or reasonably foreseeable adverse impacts as a result of the Project on ERFN's Aboriginal and Treaty rights. The mutually agreed upon process steps, inputs, outputs, and principles to be followed in the RIA process are detailed in Schedule "A" to these Terms of Reference.

7. Development of the EA Report

Scope

Following the CNSC's acceptance of a final EIS submission, ERFN and CNSC staff will collaborate on developing sections of CNSC staff's EA Report that are related to information or concerns provided by ERFN in respect to potential project impacts on ERFN's Aboriginal and Treaty rights, interests, culture, or traditional uses, as well as ERFN Traditional/Indigenous Knowledge. For greater clarity, this expressly includes the incorporation of ERFN's Traditional/Indigenous Knowledge, rights-based and cultural information, land use information, potential impacts of the proposed Project on ERFN's Aboriginal and Treaty rights, interests, culture, and traditional uses, and other topics raised throughout ERFN's participation in the collaborative, federal EA process, guided by these Terms of Reference. These sections will be mutually agreed upon between CNSC staff and ERFN, in advance of the development of CNSC staff's EA Report.

Key Principles

Collaborative development processes requires and means the joint drafting of the relevant sections of the EA Report. CNSC and ERFN staff will determine how to conduct the joint drafting process. The objective of ERFN and CNSC staff is to develop mutually agreed upon language of the relevant sections in the EA Report.

Where common ground cannot be achieved following the application of the "Common Ground Model" as described in Section 8 of these Terms of Reference, the objective of each party is to independently document their diverging views. These diverging views shall be written independently by each respective party holding said view and the written views of each respective party shall be summarized in the EA Report in an appropriate section or annex. The EA Report will make specific reference to any relevant documentation submitted by ERFN on the matter.

It is important to note that all EA timelines referred to in this document are based on CNSC staff's service standard for completing an EA under CEAA 2012 within a 24-month federal timeline. The participants will work towards drafting materials within

reasonable and mutually agreed-upon timelines. ERFN's appointed representative will have up to 17 weeks to collaboratively draft those sections of the EA Report, including those required for the inclusion of a summary of ERFN's views where common ground cannot be achieved. The parties commit to exercising best efforts in providing ongoing communication as between the participants during this 17 week period. Should these timelines not be met, ERFN and CNSC will apply the "Common Ground Model" as described in section 8 of these Terms of Reference.

8. Common Ground Model

Where common ground is achieved

ERFN and CNSC staff agree to use all reasonable efforts to obtain common ground in addressing all procedural, technical, and other issues as they arise throughout all steps in the federal EA process and the RIA process, and the conduct of the participants in relation thereto shall be in accordance with these Terms of Reference. Where common ground is achieved, ERFN and CNSC staff will collaboratively develop, and mutually agree upon all language reflecting the areas of common ground for all relevant recommendations, reports, sections or other materials as outlined in these Terms of Reference, to be issued by CNSC staff in respect of the Project, for the Commission's consideration.

Where common ground cannot be achieved

The participants will raise all diverging views with the Participants' Principals in a timely manner where it is reasonably foreseeable that common ground may not be achievable after making all best efforts in order to facilitate discussions between the participants, and further for the Participants' Principals to provide their views and advice with a view to achieving common ground. To the extent possible and reasonable, ERFN and CNSC staff shall make efforts to consolidate issues raised before the Participants' Principals to promote efficiency and limit the need for each Participants' Principals to resolve such issues, as may be required by these Terms of Reference.

ERFN and CNSC staff shall be provided the opportunity to explain to the "Participants' Principals" the relevant issue(s), the efforts to obtain common ground, and the reasons why common ground could not be achieved. The Participants' Principals may, upon their own election, consult their respective legal advisors contemporaneously prior to, upon, or following, receipt of the communication(s) of their respective representatives or staff, and may do so prior to making their respective decisions, and further, may do so while considering the issue with the other Participant's Principal.

Where common ground cannot be achieved following the application of the “Common Ground Model” as described in Section 8 of these Terms of Reference, the objective of each party is to independently document their diverging views. These diverging views shall be written independently by each respective party holding said view and the written views of each respective party shall be summarized in the EA Report in an appropriate section or annex. The EA Report will make specific reference to any relevant documentation submitted by ERFN on the matter.

Participants’ Principals

ERFN Party Principal: ERFN Chief or designate

CNSC Party Principal: Director General,
Directorate of Environmental and Radiation Protection and Assessment

9. Signatures



Chief Jerry Bernard

English River First Nation

December 1st, 2021

Date



Haidy Tadros

Director General, Directorate of Environmental

And Radiation Protection and Assessment

Canadian Nuclear Safety Commission

December 1st, 2021

Date

Schedule A: Rights Impact Assessment Process and Principles

Guiding Principles

CNSC staff and ERFN are committed to collaborating on and carrying out a thorough, evidence-based Rights Impact Assessment (RIA) for the Denison Wheeler River Project (the Project).

The process for the RIA will be consistent with the Government of Canada's commitments with respect to recognition, protection, and upholding of the rights of Indigenous peoples, including ERFN's Aboriginal and Treaty rights, interests, culture, or traditional uses, specifically.

The RIA will be developed and completed in collaboration between CNSC staff and ERFN with the aim of reaching consensus on the content of the RIA and its findings. Denison may also participate in the process, where appropriate. ERFN and CNSC staff will seek to assess the adequacy of proposed measures including mitigations, follow-up and monitoring, and/or any other measures proposed by Denison, the CNSC, the Province of Saskatchewan, or other Government organizations, to mitigate, avoid, or offset any identified or reasonably foreseeable adverse impacts on ERFN's Aboriginal and Treaty rights as a result of the Project.

The federal EA and RIA process for the Project will include Traditional/Indigenous Knowledge, in addition to the perspectives of ERFN members and ERFN leadership, and will clearly demonstrate how this Traditional/Indigenous Knowledge has informed the RIA and federal EA process, in accordance with these Terms of Reference or any other mutually agreed upon process(es) as between the Participants to assist the CNSC in conducting meaningful consultation with ERFN.

The Participants agree that the consideration of potential adverse impacts as a result of the Project, to ERFN's Aboriginal and Treaty rights, interests, culture, and traditional uses, through a principled methodology will help improve the Commission's decision-making processes and advances the objectives of reconciliation. Processes and methodologies that are collaboratively designed and mutually agreed upon by Indigenous peoples and governments improve the understanding and assessment of a project's potential effects on Aboriginal and Treaty rights, interests, culture, or traditional uses. Further, by establishing these cooperative processes early in the federal EA process, the CNSC may better understand and consider the Traditional/Indigenous Knowledge and cultural values of ERFN, as well as ERFN's laws and traditions.

The goal of the RIA is for the Participants to reach a mutual understanding of the significance of any identified potential or reasonably foreseeable impacts on ERFN's Aboriginal and Treaty rights, interests, culture, or traditional uses, arising as a result of

the Project. In addition, the purpose of the assessment is to assess the adequacy of proposed measures including mitigations, follow-up and monitoring, and/or any other measures proposed by Denison, the CNSC, the Province of Saskatchewan, or other Government organizations, to mitigate, avoid, or offset any identified or reasonably foreseeable adverse impacts on ERFN's Aboriginal and Treaty rights as a result of the Project, and to communicate the processes, outcomes and recommendations of ERFN and CNSC staff in a collaborative, mutually agreed upon manner, for the Commission's consideration in its decision-making process.

Process Steps

The RIA shall be collaboratively developed in accordance with the terms of the Terms of Reference and mutually finalized as between CNSC staff and ERFN with a view to reaching consensus on the content of the RIA and its findings. The process can include the participation of Denison where appropriate. ERFN and CNSC staff will work towards assessing the adequacy of proposed measures to address any identified adverse impacts as a result of the Project, on ERFN's Aboriginal and Treaty rights, interests, culture, or traditional uses. ERFN and CNSC staff, and Denison where appropriate, will adhere to the processes detailed below when completing the RIA for the Project. Conditions that positively support and/or are required for the exercise of ERFN's Aboriginal and Treaty rights, interests, culture, and traditional uses, will be identified and clarified by ERFN in a timely manner throughout the processes detailed below.

Process Step	Inputs	Lead (Partner)
Step 1: Identification of potentially impacted rights and interests.	ERFN Indigenous Knowledge, cultural practices and land use information ERFN Treaty Rights and claims	ERFN (CNSC)
Step 2: Identification of how cumulative effects, current territorial capacity and historical context affect the community's current exercise of rights which forms the current baseline conditions.	ERFN Indigenous Knowledge, cultural practices and land use information ERFN Treaty Rights and claims Denison EIS	ERFN and Denison
Step 3: Identification of potential project interactions/pathways with identified rights and interests (i.e. potential changes to current baseline conditions related to the project).	ERFN Indigenous Knowledge, cultural practices and land use information ERFN Treaty Rights and claims Denison EIS	ERFN and Denison

Process Step	Inputs	Lead (Partner)
Step 4: Identification of severity of potential project interactions with identified rights and interests (including collaborative development of criteria and steps to assess and determine severity).	ERFN Indigenous Knowledge, cultural practices and land use information ERFN Treaty Rights and claims Denison EIS	ERFN, CNSC, and Denison
Step 5: Identification of potential mitigation and/or accommodation measures to address identified potential project interactions with identified rights and interests	ERFN Indigenous Knowledge, cultural practices and land use information ERFN Treaty Rights and claims Denison EIS	ERFN, CNSC, and Denison
Step 6: Identification of any residual impacts after consideration of proposed mitigation and/or accommodation measures	ERFN Indigenous Knowledge, cultural practices and land use information ERFN Treaty Rights and claims Denison EIS	ERFN, CNSC, and Denison
Step 7: Consideration of any additional mitigation and/or accommodation measures, should residual impacts be identified, and conclusions on seriousness of any remaining impacts or concerns	ERFN Indigenous Knowledge, cultural practices and land use information ERFN Treaty Rights and claims Denison EIS	ERFN, CNSC, Province of Saskatchewan and Denison
Step 8: Documenting and submitting process steps and outcomes to decision-makers (the Commission) <ul style="list-style-type: none"> - Collaborative drafting of stand-alone rights impact analysis to be appended to CNSC staff's EA Report - ERFN written and oral interventions at Commission hearings 	Final RIA addendum to EA Report Final ERFN written and oral interventions	ERFN and CNSC

From: [Froess, Ryan](#)
Cc: [Adam Zenobi \(adam.zenobi@cnscccsn.gc.ca\)](#)
[kevin.mercredi@outlook.com](#); [Chief Coreen Sayazie](#); [b-tsannie@hotmail.com](#); [Shea Shirley](#); [Garrett Schmidt](#); [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#); [jerry.bernard@erfn.net](#); [Mark Calette](#); [slandriecrossland@mns.work](#); [s.nickolet@mns.work](#); [Walter Smith](#); [Billie Jo Natomagan](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [tcooksearson@lrib.ca](#); [gchristiansen@lrib.ca](#); [lbnouf@mns.work](#); [tex.mns@sasktel.net](#); [Eric Sylvestre](#); [chief1@birchnarrows.ca](#); [norma.catarat@outlook.com](#); [Elmercampbell35@gmail.com](#); [glenmccallum](#);
Bcc:
Subject: CNSC Participant Funding Notice - Denison Mines Draft EIS
Sent: 2022-01-10 3:33:00 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Funding is available to assist Indigenous peoples, members of the public and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Denison is proposing to develop an in situ recovery uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit a completed participant funding application is March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/ptp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

For questions about this specific funding opportunity, please contact:

Mr. Adam Zenobi
Participant Funding Program Administrator
613-415-2814
ptp@cnscccsn.gc.ca

Thanks,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892

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From: [Way, Jessica](#)
To: [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](mailto:Cheyenna.Campbell@desnedhe.com)
Cc: [Levine, Adam](#); [Yen, Wish](#); [DeCoste, Laura](#); Mossop, Veronica; [Akhter, Salman](#); [Froess, Ryan](#);
Subject: ERFN/CNSC - Denison Wheeler River Project - January 25th Monthly Meeting Minutes
Sent: 2022-02-04 1:44:15 PM

Hi Cheyenna,

Sorry for the delay, but please see below the meeting minutes from our meeting on January 25th.

We have a couple of follow ups to provide, in terms of information about the CNSC's policy on confidentiality when it comes to Indigenous Knowledge and I had committed to providing a snapshot of overall EA timelines; additional information to come next week. I also wanted to note, a number of CNSC staff attended the meeting last week where Denison described the field test they are proposing, including Salman and I. This relates to Salman's action item, but we are still having discussions around this internally and will provide an update on CNSC's position on this when we can.

Meeting Minutes- January 25th:

-
Attendees: Cheyenna Campbell, Jes Way, Ryan Froess, Salman Akhter, Adam Levine, Wish Yen

Updates from ERFN:

- COVID situation: Outbreaks continue to be taking place within the communities and due to the less severe symptoms of COVID, there is underreporting of cases (Vaccination rate is about 65%)
- Relationship with Denison: Still maintaining frequent communication related to the Wheeler River project
- Field Test of current in-situ model
 - Denison has been updating the ERFN and ERFN consultants, EcoMetrics, on the field test with documentation, providing presentations and information as requested
 - Main concerns related to this project include protection of water, land, environment and people as this is the first test of this type in Canada and uranium will be "mined" during the test.
 - The ERFN has stated that they would like additional information from the CNSC related to this program as the CNSC is a familiar and well-known regulator of nuclear substances. There is concern with solely the Province of Saskatchewan leading the regulation on the field test as they are not a familiar regulator.
 - The ERFN wants to ensure that safety standards and processes of the province are the same or better than the CNSC. The decommissioning standards and environmental monitoring must also meet the same standards or better as the CNSC.
 - The ERFN requests guidance on the province's standards so a similar level of trust can be developed in the province as with CNSC
 - The ERFN does not wish to cause delay in Denison's schedule on the field test, but want to ensure all the steps taken before the field test meet standards and will protect the health and safety of the environment and people
 - Provincial elections have resulted in a 1-month delay until February 15th on the field test project as the province can not move forward on the project until results of the elections are released.
 - The ERFN, EcoMetrics and lawyers will be meeting with the Ministry of the Environment from the province via Zoom to discuss the project once provincial elections are completed.
 - The CNSC and other federal technical experts will be meeting with Denison for a presentation on the field test on Wednesday Jan 26th
 - Updates on this field test will be provided to the ERFN
 - Internal discussions will take place within the CNSC and with federal technical experts to ensure no additional oversight or review of the field test is required
 - ERFN wishes to confirm that the province will step in or regulate with support from the province if the project exceeds the scope of the Province's regulations
 - Salman will provide an update to ERFN regarding the threshold for the uranium production that would require CNSC intervention (total volume or total concentration? Which Regs apply, why/why not?) (Action)

EIS Submission:

- The ERFN has provided Denison a technical study (193 pages) with ERFN traditional knowledge to be incorporated by Denison into the EIS. The ERFN does not want the study to simply be appended into the EIS
 - It is important to the ERFN that Denison incorporates the information to capture their concerns. The ERFN is expecting Denison to use the information to better the environment and community, not just protect or mitigate issues.
 - The project will be impacting 25% of the ERFN's traditional territories, the ERFN is concerned that harvesting locations of fish and caribou will be impacted. Protection of these locations and monitoring programs need to be detailed.
 - The ERFN and Denison are working together to pull information from the technical report. Denison will be working with ERFN next week to determine how to incorporate ERFN knowledge into the EIS. A table of contents will be sent to the ERFN for review.

- The technical study is a good knowledge encapsulation and educational document for the community.
- The CNSC has requested a copy of the technical document so we can determine how the traditional knowledge of the ERFN is integrated into the EIS.
 - CNSC offered to go through TK confidentiality policy in next meeting, as information contained in proprietary (Action)
- The ERFN will also be writing a chapter in the EIS to outline baseline of socio-economic standards and technical standards of the nation. This chapter will also include how Wheeler River is used by the community or interacted with by the community.
- Engagement with the community has been taking place. Denison has been putting in considerable effort to demonstrate they prioritize engagement. Presentations are translated into Dene and the community is able to participate or send in inquiries to Denison via phone, letters or emails.
 - The technical study is a good way to gauge how the community feels regarding the project.

EIS Process:

1. Submission of the draft EIS by Denison
 - a. 90 days for an EIS review (public comment period) begins – this open comment period should incorporate the community, with general comments and the community's feelings on the project noted.
 - b. Federal review takes place concurrently (8 weeks) with technical experts from the Federal, Provincial and Indigenous Review Team (FIPT) participating to draft information requests (IRs) to Denison – the ERFN will be participating in this review.
 - This is an iterative process, and continues for multiple rounds until IRs are adequately addressed in the draft EIS.
2. Submission of final EIS by Denison
3. Drafting of Environmental Assessment Report by CNSC – review by ERFN will be requested
 - a. The report will be a summary of the information found in the final EIS submission, including consultation, work to date, commitments etc. This document will be part of the CMD and does not have a formal comment period.
 - b. CEAA 2012 engagement by the CNSC with ERFN
 - c. Rights Impact Assessment drafting by the CNSC with review by ERFN
4. Hearings for the Project begin once an EA is submitted to the Commission with the final EIS
 - a. There are usually two hearings, the first hearing is the presentation of the project and final EIS by Denison and the EA by CNSC
 - b. The second hearing will be interventions, from the public and Indigenous Nations and communities. It is recommended the ERFN prepare an intervention to participate in the hearing.

Participation Funding Program (PFP) Application (Due in March):

- PFP for the EIS:
 - The ERFN requests guidance on requesting and budgeting for the PFP.
 - PFP is allocated based on rights impacted and the proximity of the nation. As ERFN will be greatly impacted by this project, an estimate for PFP funding should range between 90 to 100 thousand dollars for the PFP request
 - Scope to consider for the PFP funding should include:
 - Consultant fees – ERFN currently has procedural consultants, SVS, and technical consultants. Determine a percentage for how the funding would be allocated for each consultant. Allocate equal or more funding for the community and nation's feedback.
 - Request an estimate on the length of the EIS from Denison to gauge the approximate hours that would be needed to review the EIS. For the EIS review, focus on aspects of the EIS that ERFN and consultants have not drafted.
 - Participation in the FIPT when the technical reviews of the draft EIS begins. This process is iterative and budgeting should take into consideration the possibility of multiple rounds of review of IR responses from Denison.
- PFP under the Terms of Reference:
 - A separate PFP application for other funding under the terms of reference will range to approximately 90 thousand dollars. This funding will encompass:
 - Rights Impact Assessment (RIA) development with the CNSC
 - Environmental Assessment (EA) review
 - CEAA 2012 engagement with the CNSC
 - Intervention preparation and participation
 - To maximize consultant expertise, it is recommended that once consultant is used for the draft EIS and one consultant for the FIPT or RIA. Determine a consultant assisting in a general capacity and a consultant who works in an intimate or technical capacity with the nation.
 - The technical document author should be involved in the FIPT to ensure IRs address gaps in integration of the report into the draft EIS.
 - CEAA 2012 engagement with CNSC to ensure the ERFN's exercise of rights are captured may be best completed with a consultant who has more intimate experience working with the ERFN.
 - The CNSC has proposed that the majority of the RIA will be completed by the CNSC and the ERFN can review the document to help alleviate capacity concerns.
- An additional meeting can be set up with ERFN to provide additional information on the process and guidance on the applications (Action)
- Jes noted that CNSC could send along a timeline to show the processes and their overlap (Action)

Action Items:

1. Salman (CNSC) will provide a threshold for the production of uranium
2. CNSC will prepare information related to the privacy and protection of the technical study by the ERFN at the next monthly meeting, and send out information related to policy prior to next meeting
3. The CNSC will set up a separate meeting on PFP with guidance
4. Jes to share EA timeline depicting the activities discussed

If you have any questions, comments, or edits for the minutes, please let us know.

Again, it was great meeting you last week and I'm looking forward to working with you. Have a good weekend!

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
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Commission canadienne de sûreté nucléaire | Gouvernement du Canada
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-----Original Appointment-----

From: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>

Sent: Tuesday, January 4, 2022 12:50 PM

To: Froess, Ryan; Phaneuf, Marcelle; Cheyenna Campbell (cheyenna.campbell@desnedhe.com); Adam Levine (adam.levine@cnscccsn.gc.ca); Wish Yen (wish.yen@cnscccsn.gc.ca); Way, Jessica; DeCoste, Laura

Cc: Mossop, Veronica; Salman Akhter (salman.akhter@cnscccsn.gc.ca)

Subject: ERFN/CNSC - Denison Wheeler River Project - Monthly meetings

When: Tuesday, January 25, 2022 2:00 PM-3:30 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

Hi Cheyenna,

I have added an agenda item for the CNSC and ERFN meeting next week to discuss your funding question you had earlier this week. As always let us know if you want anything else added or bring up next week.

Proposed Monthly Standing Agenda

ERFN - Update on the Denison Wheeler River Project

CNSC - Update on the Denison Wheeler River Project

Added – Discussion on Funding Opportunities for Draft EIS, Collaboration work on ToR etc.

CNSC/ERFN - Opportunities for collaboration and to work together (ToR, Rights Impacts Assessment)

Next Monthly Meeting – Topics of Interest and Action Items

Thanks,
Ryan

Microsoft Teams meeting

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From: [Way, Jessica](#)
To: [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Akhter, Salman](#); [DeCoste, Laura](#);
Subject: CNSC-ERFN Meeting Minutes - February 15, 2022
Attachments: [E-DOCS-#6277642-v2-Request_to_Protect_Confidential_Information_Outside_of_Commission_Proceedings.DOCX](#)
Sent: 2022-02-24 5:13:07 PM

Hi Cheyenna,

Please see below for our meeting notes from our February 15th meeting.

Regarding our action items:

- CNSC to send out a meeting request for the week of Feb 28-Mar 4 to address PFP (**Complete**) and a kick off meeting for the IEMP (**TBD**)
- Once Denison submits the field test application, CNSC will provide a summary of what CNSC regulates and how we will be addressing the application (**Pending**) – this has not yet been received or reviewed by CNSC staff
- Jes will provide a summary of EIS engagement activities in a graphic format for reference (**Pending**) – I am still working on the graphic of the activities for the EA process. I have something I will be able to share soon, but I'd like to run it by Ryan when he is back in office
- CNSC will share the NSDF RIA as a reference document (**Completed**) – here is a link to the NSDF CMD and Environmental Assessment report: <https://www.nuclearsafety.gc.ca/eng/the-commission/hearings/cmd/pdf/CMD22/CMD22-H7.pdf>
 - This is a pretty good example of how the Commission Member Document and Environmental Assessment Report could look for Wheeler River, should it proceed to this stage of the EA Process.
 - Particularly, the EA report is from page 172 of the PDF and ends on page 506.
 - Chapter 9 of the report is dedicated to Indigenous consultation and assessment of impacts to Indigenous and/or Treaty rights. This starts on page 307 of the PDF (124 of the EA report), and additional RIA Reports are included in the Appendices, starting on page 425 of the PDF (p. 242 of the EA report). You will see there are a couple different examples.
 - Throughout other chapters of the document are *Views Expressed* sections, which capture information provided by Indigenous Nations and Communities who were consulted on the NSDF project (for example, see Chapter 6, starting on p. 232 of the PDF, which is p. 49 of the EA report)
- CNSC staff to share info on IK policy and framework (**Completed**):
 - Here is a link to the CNSC's Indigenous Knowledge Policy: <https://nuclearsafety.gc.ca/eng/resources/aboriginal-consultation/indigenous-knowledge-policy.cfm>, and attached is the request form for requesting the protection of confidential information. We hope to discuss this in more detail during future meeting, if you are interested.

Please let us know if you have any questions or concerns about anything contained in this email.

Have a good evening!

Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

CNSC-ERFN Meeting Minutes – February 15, 2022, 3-4PM

Attending: Cheyenna Campbell, Salman Akhter, Ryan Froess, Jes Way, Laura DeCoste, Wish Yen

Participant Funding Program

- CNSC will organize a separate meeting in the coming weeks with Adam Z. (PFP Coordinator)
- The PFP meeting will include discussions around the Terms of Reference
- ERFN will be applying for funding for the draft EIS review for the Denison project
 - PFP applications for the draft EIS review are due **March 13th, 2022**

EIS Process

- ERFN requests an outline of the EIS, funding & process
 - ERFN requests that CNSC advise on where capacity may be best utilized to maximize expertise and time
- CNSC will provide options on participating in the EIS process and engagement activities
 - ERFN will determine next steps based on capacity and funding
- Traditional knowledge studies
 - CNSC noted that we would appreciate if ERFN consider sharing the TK study
 - CNSC has offered to set up a separate meeting providing information on privacy and protecting traditional knowledge studies (CNSC staff to share info on IK policy and framework)
 - Options to be provided and ERFN can determine the best path forward

Engagement with Denison

- ERFN has hired a technical expert and has expressed that Denison provide technical responses to address questions and concerns raised by the ERFN expert
- Concern is raised that Denison is sharing information in plain language to build trust, but the next meeting needs to be a conversation between technical experts

- ERFN will be requesting a technical meeting with Denison to ensure these questions and concerns are discussed
- Focus of the discussion to be the upcoming field test

Engagement with the Province

- No updates as the provincial bi-election for Churchill area has not been completed
- ERFN wants to actively participate in the Province's process
- ERFN has requested information from the province related to the field test, but no documentation can be provided until after the election has taken place
- ERFN reiterates the request for confirmation that the Province's regulatory process is equivalent to the CNSC or better
 - The ERFN consultant will advise on safety standards for the province and may advise ERFN to request CNSC oversight
 - ERFN requests assurance that the Province will be held accountable for the same standards, safety measures, levels of effluent release etc.

Licensing

- CNSC staff are discussing the field test activities and will review the application for the field test once Denison has sent it to the province
 - CNSC is currently exploring previous decisions on similar projects
 - This review will include test activities and environmental impacts of the field test
- CNSC will provide an update to the ERFN on possible oversight by CNSC after Denison provides an application for the field test for review
 - CNSC is anticipating the application to come in within the next week
- CNSC is confident in the Province's regulation process, but should CNSC regulations apply, will act accordingly

Rights Impact Assessment

- ERFN has confirmed collaboration with the CNSC in drafting the RIA
 - ERFN has expressed interest in participating fully in the RIA, ensuring the nation is well represented

In-person meetings

- CNSC has offered to engage with members in person (in fall) pending COVID restrictions
- Meetings could be information sessions or learning sessions pending ERFN interest in the Wheeler River Project or Environmental Assessment process

IEMP

- CNSC will set up a separate meeting to discuss ERFN participation in the IEMP

Action Items

1. CNSC to send out a meeting request for the week of Feb 28-Mar 4 to address PFP (complete) and a kick off meeting for the IEMP
2. Once Denison submits the field test application, CNSC will provide a summary of what CNSC regulates and how we will be addressing the application
3. Jes will provide a summary of EIS engagement activities in a graphic format for reference
4. ERFN will be completing a PFP application for the review of the draft EIS for the Wheeler River Project
5. CNSC will share the NSDF RIA as a reference document
6. CNSC staff to share info on IK policy and framework

From: [Froess, Ryan](#)
To: [Way, Jessica](#)
Subject: FW: CNSC Participant Funding Notice - Denison Mines Draft EIS
Sent: 2022-03-10 5:07:12 PM

FYI sent to these Nations and communities.

kevin.mercredi@outlook.com; Chief Coreen Sayazie <csayazie@hotmail.com>; b-tsannie@hotmail.com; Shea Shirley <shea.shirley@yathinene.com>; Garrett Schmidt <garrett.schmidt@yathinene.com>; [Cheyenna Campbell](#) ([cheyenna.campbell@desnedhe.com](#)); [jerry.bernard@erfn.net](#); Mark Calette <mcalette@mns.work>; slandriecrossland@mns.work; s.nickolet@mns.work; Walter Smith <wsmith@kineepik.ca>; Billie Jo Natomagan <bnatomagan@kineepik.ca>; jtsanniejr@pagc.net; rmcleod@pagc.net; tcooksearson@llrib.ca; gchristiansen@llrib.ca; lburnouf@mns.work; tex.mns@sasktel.net; Eric Sylvestre <eric.sylvestre@birchnarrows.ca>; chief1@birchnarrows.ca; norma.catarat@outlook.com; Elmercampbell35@gmail.com; glenmccallum glenmccallum@mns.work

From: Froess, Ryan
Sent: March 9, 2022 4:12 PM
Cc: Adam Zenobi ([adam.zenobi@cnsccsn.gc.ca](#)) <[adam.zenobi@cnsccsn.gc.ca](#)>
Subject: RE: CNSC Participant Funding Notice - Denison Mines Draft EIS

Good afternoon,

This is a reminder that funding is available to assist Indigenous Nations and communities, members of the public, and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit this funding application is due March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/pfp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

If you have any questions on the application **please do not hesitate to reach out** to myself by phone or email and or for specific questions please feel free to contact:

Adam Zenobi
Participant Funding Program Administrator
613-415-2814
[pfp@cnsccsn.gc.ca](#)

Thanks you,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
[ryan.froess@cnsccsn.gc.ca](#) | Cell: 306-914-7892

From: Froess, Ryan
Sent: January 10, 2022 2:33 PM
Cc: Adam Zenobi ([adam.zenobi@cnsccsn.gc.ca](#)) <[adam.zenobi@cnsccsn.gc.ca](#)>
Subject: CNSC Participant Funding Notice - Denison Mines Draft EIS

Good afternoon,

Funding is available to assist Indigenous peoples, members of the public and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Denison is proposing to develop an in situ recovery uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit a completed participant funding application is March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/pfp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

For questions about this specific funding opportunity, please contact:

Mr. Adam Zenobi
Participant Funding Program Administrator
613-415-2814
pfp@cnscccsn.gc.ca

Thanks,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892

For all the latest CNSC news, visit CNSC's homepage at <http://www.nuclearsafety.gc.ca/eng/>

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If you experience any difficulties in accessing the CNSC website, please send an email to cnscccsn.info@cnscccsn.gc.ca

To unsubscribe, send an email to cnscccsn.info@cnscccsn.gc.ca

From: [Boser, Sydney](#)
To: [Boser, Sydney](#)
Subject: RE: Indigenous Knowledge report and Socio Economic Report on behalf of ERFN.
Sent: 2025-07-22 8:39:13 AM

From: Cheyenna Campbell <cheyenna.campbell@desnedhe.com>
Sent: March 21, 2022 12:29 PM
To: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>
Cc: Jamie Dickson <jamie.dickson@desnedhe.com>; Larry Innes <LInnes@oktlaw.com>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: Indigenous Knowledge report and Socio Economic Report on behalf of ERFN.

Happy Monday Carolanne!

Please see attached ERFN Indigenous Knowledge report and Socio Economic Report.

These reports are the intellectual property of the ERFN, and constitute "Traditional Knowledge Reports" within the terms of the Denison – ERFN Participation and Funding Agreement ("PFA"). Accordingly, the use of these reports for the purposes of the IA Process, including the development of the Environmental Impact Study, is subject to the Permitted Purposes and associated terms and conditions set out in section 8 of the PFA. Copies of these reports may not be disclosed to any person or entity without ERFN's prior written consent.

We trust that these documents- while forming part of the EIS- are not for general dissemination and should not form part of the public record when forwarded to the CNSC.

Take Care,

Cheyenna

Cheyenna R. Campbell B.A., LL.B.
Lands & Resources Manager

English River First Nation
Urban Office
301 - 2555 Grasswood Road
Saskatoon, Sk. S7T0K1

Cell: 306.291.6808

Email: cheyenna.campbell@desnedhe.com

From: [Way, Jessica](#)
To: jerry.bernard@erfn.net
[Kwamena, Nana-Owusua](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Akhter, Salman](#); [Way, Jessica](#); [Yen, Wish](#); [Levine, Adam](#); [Froess, Ryan](#); [Aimann Sadik](#); [England, Brianne ENV](#); [Cheyenna Campbell](#) (cheyenna.campbell@desnedhe.com);
Cc:
Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application
Attachments: [6813254-v3A-2022_Wheeler_River_Field_Test_-_Notification_Letter_to_ERFN.pdf](#)
Sent: 2022-06-17 4:20:24 PM

Dear Chief Bernard,

The purpose of the attached letter is to notify you of an application from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,
Jes Way

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213



June 17, 2022

e-Doc: 6813254

Chief Jerry Bernard
English River First Nation
jerry.bernard@erfn.net

Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Dear Chief Jerry Bernard:

This letter is to inform you that Denison Mines Corp. (Denison) has submitted an application to the Canadian Nuclear Safety Commission (CNSC) for a Nuclear Substances and Radiation Devices licence, for the Wheeler River Exploration Project in northern Saskatchewan. This licence application is for the temporary storage and use of natural uranium in laboratory studies, for a 60 day feasibility field test that Denison are planning to conduct in August 2022. Following completion of the test, the recovered material will be temporarily stored above ground.

Proposed Wheeler River Project

The Wheeler River Property is located in the eastern part of the Athabasca Basin, approximately 4 km west of Highway 914 and 35 km north of the Key Lake mill. Denison has proposed a project to construct, operate, and decommission an in-situ uranium mine. An [Environmental Assessment \(EA\) under the Canadian Environmental Assessment Act of 2012](#) (CEAA 2012) has been underway since 2019 for the proposed Wheeler River Project, led by CNSC staff. Concurrently, the Government of Saskatchewan is also leading a [provincial EA](#).

Field work at the site has been occurring since 2007, with advanced drilling and testing occurring since 2019. These activities have had continual oversight from the Saskatchewan Ministry of Environment, and the CNSC as necessary.

It is important to note that the proposed feasibility field test is not within the scope of the CEAA 2012 EA, as this is a distinct project. The field test could therefore proceed prior to an EA decision.

Feasibility Field Test

Through the feasibility field test, Denison intends to validate previous testing and determine the feasibility of the proposed in-situ recovery mining methodology at the Wheeler River Property. This test requires no new clearing of land or new drilling, only the construction of limited temporary surface facilities.

During the planned test, mineralized material will be removed from the ground through a process that includes injecting a solution into test wells, separating liquids from solids, and collecting the resulting materials for further analysis. These materials are expected to contain elevated levels

natural uranium, and samples will be analysed for general chemistry at the on-site chemical laboratory and later transported to the Saskatchewan Research Council in Saskatoon for further analysis. Once all analysis is complete, materials will be placed in above ground storage tanks, and will remain the property of the Crown, under the oversight of the Saskatchewan Ministry of Environment (SMOE).

In March 2022 an application was also submitted to the SMOE, as Denison requires a permit to construct and operate a pollutant control facility prior to conducting the proposed feasibility field test. This permit is required under Saskatchewan's *Mineral Industry Environmental Protection Regulations, 1996*, and the application remains under provincial review.

Licensing Process

Unlike Class I nuclear facilities and uranium mines and mills, licences for use of Nuclear Substances and Radiation Devices are issued by a Designated Officer (DO) of the CNSC. A DO is a member of CNSC staff who has been designated specific powers under the *Nuclear Safety and Control Act* with respect to licensing and compliance. Like the Commission, DOs demonstrate independence and procedural fairness. With their extensive knowledge, regulatory training and operational experience, DOs are well qualified to make decisions on behalf of the Commission. DO decisions are based on rigorous reviews performed by CNSC staff, who verify that the applicant would meet regulatory requirements. After completing their evaluations, CNSC staff prepare DO documents – which include technical and regulatory information, conclusions and recommendations – to help inform DO licensing decisions.

Nuclear Substances and Radiation Devices licences have a service standard of 80 business days for a DO decision, from the date a complete application has been received. DOs will only grant the licence if they are satisfied that the authorized activities do not pose a risk to health, safety, security and the environment.

As an Indigenous Nation and/or community with a potential interest in Denison's licence application, the CNSC is interested in hearing any views or receiving any additional information you may have with respect to Denison's application to the CNSC for a Nuclear Substances and Radiation Devices Licence, for this proposed project.

Further Information

CNSC staff will continue to keep you apprised of the status of this licence application, DO decision and next steps, including more information on the CNSC's licensing requirements and oversight activities should a licence be granted to Denison for the proposed field test.

If you would like to meet to discuss in further detail, and have any questions relating to this licence application or the ongoing EA for the Wheeler River Project, please contact:

- Jes Way, Environmental Assessment Officer, Wheeler River EA Lead
Email: jessica.way@cnsccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous and Stakeholder Relations Division
Email: ryan.froess@cnsccsn.gc.ca

If you wish to receive e-mail notifications related to the EA process and other updates on this licensing process, please let us know and we can add you to the project distribution list.

You may also sign-up to the CNSC mailing list to receive notifications CNSC website is updated, including notices for hearings, meetings and Participant Funding Program opportunities. Visit the following link and choose the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

Sincerely,



Nana Kwamena

Director, Environmental Assessment Division
Canadian Nuclear Safety Commission
E-mail: nana-owusua.kwamena@cnsccsn.gc.ca

c.c.: C. Campbell
S. Faille, N. Babcock, P. Burton, S. Akhter, J. Way, W. Yen, A. Levine, R.
Froess, CNSC
A. Sadik, B. England, SEASB

From: [Way, Jessica](#)
To: [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](mailto:cheyenna.campbell@desnedhe.com)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [DeCoste, Laura](#);
Subject: ERFN-CNSC Meeting Minutes - June 3rd, 2022
Sent: 2022-06-28 3:00:36 PM

Hi Cheyenna,

Below are the minutes from our last meeting. I only realized today that they didn't get sent at the beginning of June! I know you've been away and probably didn't miss them, but apologies for the delay on this.

Can you please confirm the spelling of Averly's name (in **Green**) for us, the student who attended the last meeting? I may have gotten it completely wrong, but we'd like to correct this for the record. Also, I've included a couple of updates near the very bottom in **blue**.

Our next meeting is not until July 26th. Is that going to be soon enough, given some of the outstanding discussion on the NSRD licence?

Thanks,
Jes

ERFN-CNSC Meeting Notes – Denison Mines Wheeler River Project

Date/time: June 3, 2022, 11 am to noon CST

Attendees: Cheyenna Campbell, **Averly McIntyre**, Ryan Froess, Jessica Way, Laura DeCoste, Wish Yen

-
Updates

-
Cheyenna Introduced new student working with ERFN, **Averly McIntyre** from the Saskatchewan Indigenous Institute of Technologies. Also noted that she would be leaving in a week, and gone for two following that.

EIS

- ERFN is currently preparing for Denison's EIS
- As stated in their collaborative agreement with Denison, ERFN will be reviewing sections of the EIS before it is submitted to the CNSC. Denison has provided ERFN with a workplan that outlines when they will send the sections for review.
- ERFN does not expect to have substantial feedback but it provides an opportunity for their technical team to review the information ahead of time.

Denison Community Tour

- Ryan went to the community meetings with Denison during the week of May 30th. They met with Chief and Council as well as attended open houses in Patuanak and La Plonge.

- Talked to members who had concerns with the project. CNSC staff plan to follow up to provide information about the public comment period.
- Cheyenna confirmed that she is the official representative for ERFN – ERFN wants to reaffirm that no one else represents the Nation, the Chief and Council or the ERFN communities' views on the Denison Wheeler River Project
 - There are community members that are distrustful of the government and industries, including CanNorth which is often associated with Cameco
- CNSC staff mentioned to Chief and Council that the CNSC would like to come up in the fall for a tour with Denison. ERFN indicated that the last two weeks of September would likely be good.

Field testing

- CNSC staff have received an application from Denison for a Nuclear Substance and Radiation Device licence for the field test that they are proposing.
- CNSC staff have informed Denison that a waste and decommissioning licence may be required if they plan to reinject-waste material back into the mineralization zone. Based on this, Denison is considering storing the material above ground.
- ERFN prefers that waste materials are stored above ground.
- ERFN asked what would happen with the stored field test material if the mine did not proceed, and how the CNSC would proceed if Denison did not have funds to deal with this waste. ERFN is concerned that the nuclear waste could remain at the site. CNSC staff will follow up with a response to this question, and may request that a member of the Nuclear Substance and Radiation Device Division attend the next meeting, to answer questions as needed.
- Denison is expected to submit a revised application to clarify storage of the material above ground.
- Once the CNSC has received the revised application, CNSC staff will send ERFN a letter with additional information.

Participant Funding Program:

- ERFN should receive an email on June 3 regarding the funding announcement

Actions:

- CNSC staff to provide ERFN clarification regarding the nuclear substance and radiation device licence requirements and safeguards, in the event that Denison does not proceed with a Uranium Mine and Mill Licence application. [Update: this type of licence does fall under the Financial guarantee for nuclear substances and radiation devices program, so Denison will provide a financial guarantee. For a bit of context: "A financial guarantee is a tangible commitment by a licensee that there will be sufficient resources to safely terminate licensed activities. When licensees terminate their activities, they must properly account for the safe disposal of all licensed material and equipment, and must demonstrate that all locations associated with the licence are free of radioactive contamination. Failure to properly terminate licensed activities can result in risk to the health and safety of persons and the environment. A financial guarantee does not relieve licensees from complying with regulatory requirements for termination of licensed activities, but ensures there are funds available when licensees are unable to carry out safe termination". More information on this is available on the CNSC webpage: \[Financial Guarantees - Canadian Nuclear Safety Commission\]\(#\). Further to this, should Denison decide not to proceed with the proposed project for which an EA is underway, or should the EA result in a negative decision and the project cannot proceed, this doesn't relieve the licensee of any responsibility. The important point to note here though is that once the activities are licensed, the licence will remain until any waste can be safely shipped or disposed of, and it will remain under the regulatory oversight of the CSNC. Another licence to dispose of the waste will be required,](#)

but the type will depend on a number of factors. This is the purpose of the financial guarantee though, to ensure that the funds potentially needed in a future scenario, such as the above, are in place prior to the granting of a licence.

- ERFN will review / complete the confidentiality forms

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada

Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#)
Cc: [Babcock, Neil](#); [Froess, Ryan](#); [Yen, Wish](#);
Subject: ERFN-CNSC Meeting Minutes - July 20, 2022
Attachments: #6277642-
[Request_to_Protect_Confidential_Information_Outside_of_Commission_Proceedings.DOCX.DRF](#)
Sent: 2022-07-27 1:20:51 PM

Hi Cheyenna,

Here are the minutes from our last meeting. Attached is the confidentiality form, in case you need it.

Thanks,
Jes

English River First Nation-CNSC Meeting Minutes – Denison Mines Wheeler River Project

Attendees: Cheyenna Campbell, Neil Babcock, Ryan Froess, Jessica Way, Wish Yen
July 20, 2022 – 1-2PM EST

Licensing Discussion with Nuclear Substances and Radiation Devices (NSRD) Project Officer (Neil Babcock)

Financial Guarantee for the Denison Field Test:

- Financial guarantee for nuclear substance programs: CNSC has a financial guarantee in place for all licensees under this program. The CNSC purchases an insurance policy and renews it annually, with licensees contributing to the costs to purchase this policy. The Commission resolves remediation issues should the licensee not be able to cover the costs (in instances of bankruptcy for example)
- Example: A company went bankrupt (laboratory in Toronto) and CNSC stepped in when the corporation was no longer able to comply with the order to remove materials as prescribed under the licence
 - A qualified third party was hired to remove the materials and ensure the site was free of contamination. The Insurance plan was activated to cover the costs
 - A final decommissioning report would also be provided to the Commission and once accepted, the licence will be revoked
- Should a licence be granted to Denison for the proposed field test, the financial guarantee would apply to the site as soon as the licence is issued

Indigenous Engagement:

- Currently, the remediation process is managed by CNSC without engagement with Indigenous Nations and communities (NSRD hasn't had the need to engage to date, however engagement is not specifically excluded from the process. It's just out of scope for the vast majority of the Nuclear Substance licensees at this time)
 - Indigenous engagement is currently scoped under Regulatory Operation Reports in the Nuclear Substance Program rather than through licensing activities
- ERFN wants to reiterate that Indigenous engagement must be completed if the CNSC needs to implement the financial guarantee for the field test
 - ERFN wants to participate in remediation and waste removal in decommissioning as this could impact Rights
 - CNSC has noted this request and will engage with ERFN within scope of remediation and decommissioning should this process be undertaken

Update on licensing:

- Technical assessment is completed and comments have been provided to Denison
 - Licence could be issued within the next few weeks
- Under the nuclear substance licence, there will be no disposal activities, as a result Denison will have two options for materials mined from the field test:
 1. Applying for a waste licence through CNSC – if granted, disposal of materials back into the wells could be permitted
 2. Transferring materials to a mill licence – if granted, chemical milling of the material could occur
- Nuclear Substances and Radiation Devices (NSRD) licence:
 - Licence is very procedural based, Denison has to comply with the procedures listed under the licence, any changes to procedure need to be amended and approved by CNSC before new activities can take place
 - The SK Ministry of the Environment permit is required before we can issue the licence (already approved)
 - Currently the licence comprises of:
 - Taking samples
 - Transport of dangerous goods from field site to Denison laboratory (Transport Canada)
 - Packaging of nuclear substances
 - Basic benchtop chemistry
 - Above ground storage of materials
- CNSC can impose baseline expectations on the proponents as part of the license, but the proponent is able to provide alternatives for consideration. Where the applicant proposes alternative measures, CNSC staff assess that an equivalent level of safety will be provided by those measures.

Summary of ERFN Concerns:

- ERFN has spoken with Denison on the field test and the large majority of comments were related to water and wastewater management
- ERFN has expressed concern around waste storage from the field test due to the proximity of the test to Cree Lake and other valuable water resources to CNSC and Denison
 - ERFN has discussed water and wastewater management for the field test with Denison
 - Perceived contamination concerns have been addressed by CNSC during this meeting
 - Concerns around the storage tanks and how waste will be stored and managed were raised and addressed

- Concerns around financial obligations for remediation have also been addressed by the financial guarantee
- CNSC will engage with ERFN should CNSC need to step in and complete remediation on Denison's behalf

Draft EIS

- ERFN has been receiving sections of the EIS for draft reviews
 - SVS, Robin and Patrick have been reviewing draft sections
 - ERFN will be following up with Denison on these draft sections
 - Denison has requested ERFN feedback by August 8th to incorporate into the draft EIS submission
- Anticipated draft EIS submission for mid-late September
 - Denison will be moving forward with submission of the draft EIS in September even without full completion of the field test
- Once the draft EIS submission is received, a 30 day conformity review will kick off
- Should the draft EIS pass the conformity review, a technical review and public comment period will kick off
 - 120-day technical review (extended from 90 days) – EA clock time includes weekends, as it is in calendar days
 - 90-days for technical review
 - ERFN has re-confirmed participation in the technical review period and confirmed Cheyenne will be reviewing the material from an ERFN traditional knowledge lens, as well as in the 90 day public comment period (for which PFP funding has already been granted)
 - CNSC will provide additional information on FIRT PFP
 - 30-days for compiling IRs
 - 90-day public comment review period
- Denison has the opportunity to update the draft EIS in new iterations of the draft EIS to address IRs
 - Any new information submitted by Denison would be subject to technical review
- ERFN will complete the confidentiality form with CNSC to grant use of the traditional knowledge studies shared

Fall tour (September 26th – 30th)

- CNSC will be sending 6 staff and possibly coordinating with 2 staff from the provincial EA team
- CNSC hopes to participate in the ERFN culture camp
- CNSC and Denison have been coordinating to include a site visit of the field test site, CNSC extends this invitation to ERFN representatives – details to be confirmed

Action Items

- CNSC will provide ERFN the FIRT PFP form for the technical review to ensure funding is in place for September
- ERFN will complete and return the confidentiality forms to the CNSC

From: [Way, Jessica](#)
To: jerry.bernard@erfn.net
[Kwamena, Nana-Owusua](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Akhter, Salman](#); [Yen, Wish](#); [Levine, Adam](#); [Froess, Ryan](#); [Aimann Sadik](#); [England, Brianne ENV](#); [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#);
Cc: [Way, Jessica](#)
Bcc: [Way, Jessica](#)
Subject: Notice of Nuclear Substances and Radiation Devices Licence issued to Denison Mines Corp.
Sent: 2022-08-05 11:31:00 AM

Dear Chief Bernard,

In follow up to our email and letter from June 17th, this email is to inform you that a Nuclear Substances and Radiation Devices licence has now been granted to Denison Mines Corp. (Denison) by a CNSC Designated Officer.

Denison applied for a Nuclear Substances and Radiation licence for the Wheeler River Exploration Project in northern Saskatchewan in order to complete a feasibility field test of the proposed in-situ recovery mining methodology at the Wheeler River Property. This licence, which is valid from August 3, 2022 to December 31, 2023, authorizes Denison to temporarily store and use natural uranium in laboratory studies above ground.

As always, we remain available to discuss in more detail. To obtain more detailed information or for any questions, please contact Jes Way at jessica.way@cnscccsn.gc.ca or Ryan Froess at ryan.froess@cnscccsn.gc.ca.

Sincerely,
Jes

From: Way, Jessica
Sent: Friday, June 17, 2022 4:20 PM
To: jerry.bernard@erfn.net
Cc: [Kwamena, Nana-Owusua <kwamena.nana-owusua@cnscccsn.gc.ca>](mailto:kwamena.nana-owusua@cnscccsn.gc.ca); [Faille, Sylvain <sylvain.faille@cnscccsn.gc.ca>](mailto:sylvain.faille@cnscccsn.gc.ca); [Babcock, Neil <neil.babcock@cnscccsn.gc.ca>](mailto:neil.babcock@cnscccsn.gc.ca); [Burton, Patrick <patrick.burton@cnscccsn.gc.ca>](mailto:patrick.burton@cnscccsn.gc.ca); [Akhter, Salman <salman.akhter@cnscccsn.gc.ca>](mailto:salman.akhter@cnscccsn.gc.ca); [Way, Jessica <jessica.way@cnscccsn.gc.ca>](mailto:jessica.way@cnscccsn.gc.ca); [Yen, Wish <wish.yen@cnscccsn.gc.ca>](mailto:wish.yen@cnscccsn.gc.ca); [Levine, Adam <adam.levine@cnscccsn.gc.ca>](mailto:adam.levine@cnscccsn.gc.ca); [Froess, Ryan <ryan.froess@cnscccsn.gc.ca>](mailto:ryan.froess@cnscccsn.gc.ca); [Aimann Sadik <aimann.sadik@gov.sk.ca>](mailto:aimann.sadik@gov.sk.ca); [England, Brianne ENV <brianne.england@gov.sk.ca>](mailto:brianne.england@gov.sk.ca); [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\) <cheyenna.campbell@desnedhe.com>](mailto:cheyenna.campbell@desnedhe.com)
Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Dear Chief Bernard,

The purpose of the attached letter is to notify you of an application from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,
Jes Way

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
[Brent Laroque](#); [Shannon Landrie-Crossland](#); [Way, Jessica](#); [cheyenna.campbell@desnedhe.com](#); [jerry.bernard@erfn.net](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bнатomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [mcalette@mns.work](#); [s.nickolet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#);
Bcc: [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [chief1@birchnarrows.ca](#); [Froess, Ryan](#); [DeCoste, Laura](#); [Yen, Wish](#); [Way, Jessica](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [claire_larock@hotmail.com](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [tcooksearson@lrib.ca](#); [jtsanniejr@pagc.net](#); [gchristiansen@lrib.ca](#); [Bruce Hanbidge](#); [Lo, Tiffany](#); [Janna Switzer](#); [Carolanne Inglis-McQuay](#); [Aimann Sadik \(aimann.sadik@gov.sk.ca\)](#); [Frigault, Nicole](#);
Subject: Upcoming Webinar - Rook I and Wheeler River Projects
Sent: 2022-08-24 4:42:00 PM

Good afternoon,

On September 13th from 10am to 11am CST (noon to 1pm EST), CNSC will be hosting a webinar on the CNSC regulatory review process for NexGen Energy Ltd's proposed Rook I project and Denison Mine's proposed Wheeler River project.

The webinar will cover:

- CNSC's regulatory review process for licensing and environmental assessments
- an update on the status of the Rook I and Wheeler River projects

There will be an opportunity for questions, and if you are unable to attend the webinar will also be recorded.

To register, please visit: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/meet-the-nuclear-regulator/webinar-NexGen-Rook-I-and-Denison-Wheeler-River-Projects.cfm>. More information can also be found at: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/meet-the-nuclear-regulator/index.cfm>.

Feel free to share with your distribution groups or anyone else that might be interested. If you have any questions, please don't hesitate to contact us.

Sincerely,

Jes Way

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

Outreach / Engagement Report: Executive Summary

To: CNSC.F.ExecutiveCommitteeMembers / MembresDuComitéExécutif.F.CCSN

Cc: cnsccengagement.ccsn@canada.ca, Kwaku.Agwei@cnscccsn.gc.ca

Event: Pre-EIS submission outreach and consultation for the Wheeler River Environmental Assessment (EA).

Date: September 26-28th, 2022

Location: Saskatoon, Pinehouse, and Northern Saskatchewan

Attendees: CNSC staff (ISR, UMMD, HSECD, EAD), the Province of Saskatchewan, and Indigenous Nations and communities (English River First Nation, ERFN; Ya' Thi Néné Lands and Resources Office, YNLRO; Métis Nation – Saskatchewan; Kineepik Métis Local, KML). There were approximately **10 to 50 people in attendance at the culture camps in Pinehouse and Northern Saskatchewan.**

Background:

Prior to the COVID-19 pandemic, CNSC staff had planned outreach and engagement for the proposed Wheeler River EA with Indigenous Nations and communities potentially impacted by the project. Now that the CNSC has resumed in-person meetings and the EA is progressing, this trip was rescheduled for September 2022, in order to engage with community members face to face and continue building relationships. In addition to attending a meeting in Saskatoon, staff were invited to attend culture camps for ERFN (Northern Saskatchewan) and KML (Pinehouse).

Highlights:

- Met leadership from ERFN, YNLRO and KML, as well as our points of contact for these Nations in person.
- Attended ERFN and KML culture camps, where the CNSC was invited to share traditional meals prepared by members of the communities, saw a freshly harvested moose and participated in fileting fish. These activities supported the sharing of traditional knowledge and practices with the CNSC, in anticipation of the Wheeler River EA.
- CNSC shared information on the Wheeler River Project and the next steps for the EA with community members, but the primary outcome was on the ground relationship building.

Lessons Learned:

Community members have expressed confusion between CNSC and Denison's differing roles in the Wheeler River Project. Increased CNSC in-person presence, as it relates to the project, could help to reinforce this distinction, as could opportunities to consult and engage at events where Denison is not present. CNSC staff will continue working to increase the understanding of our role as a regulator, through meetings with community members, future consultation activities, and other opportunities identified in consultation with our points of contact for the Nations.

Conclusion:

During this trip CNSC staff gained a better appreciation for scope and scale of the geographic area of the proposed project, and how the Indigenous Nations and communities use the land for hunting, fishing, and trapping and cultural use on their traditional territories. It was an opportunity to meet with land users and increase dialogue that we can build upon as the project progresses.

Attachments:

Presentation(s) (e-Doc#): [Presentation of pictures from the trip](#) (6884652); [Presentation to YNLRO](#) (6776456); [Wheeler River Pamphlet](#) (6875181)



Elder Norman Wolverine showing CNSC staff and the Province of Saskatchewan a map of English River's traditional territory.



Elder's from KML cultural camp showing staff how to filet fish.

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan; Yen, Wish; Nickolet, Sydney;](#)
[Cheyenna Hunt; jerry.bernard@erfn.net; nvp.mike@sasktel.net; wsmith@kineepik.ca;](#)
[bнатомagan@kineepik.ca; glenmccallum@mns.work; Brent Laroque; Shannon Landrie-Crossland;](#)
[garrett.schmidt@yathinene.com; shea.shirley@yathinene.com; kevin.mercredi@outlook.com; b-](#)
Bcc: [tsannie@hotmail.com; csayazie@hotmail.com; d.powder.nhsr@sasktel.net; d.classen@sasktel.net;](#)
[chief1@birchnarrows.ca; norma.catarat@brdn.ca; receptionist@mltc.net; claire_larock@hotmail.com;](#)
[karenbird@pbcn.ca; tmerasty@pbcn.ca; bmerasty@pbcn.ca; tcooksearson@llrib.ca;](#)
[jtsanniejr@pagc.net; gchristiansen@llrib.ca; cheyenna.hunt@desnedhe.com; karenbird@pbcn.ca;](#)
Subject: Wheeler River Project EIS Received - Conformity Review Underway
Sent: 2022-10-24 11:28:00 AM

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Cheyenna Hunt](#)
Cc: [Nickolet, Sydney](#); [Gorzkowski, Konrad](#); [Froess, Ryan](#); [Yen, Wish](#);
Subject: RE: ERFN-CNSC Meeting Minutes - October 25th
Attachments: [2022-09-28-CNSC at ERFN Culture Camp.pptx](#)
Sent: 2022-11-01 11:23:26 PM

Hi Cheyenna,

I just realized that I forgot to add the pictures we promised. Thanks for sending along the group shot!

Jes

From: Way, Jessica
Sent: Monday, October 31, 2022 6:51 PM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Subject: ERFN-CNSC Meeting Minutes - October 25th

Hi Cheyenna,

Thanks for your time last Wednesday after our monthly meeting, and sorry for the late follow up. I chatted with Adam Zenobi last Wednesday on the PFP topic, to let him know what we had discussed in terms of an approach for future steps of the process: that ERFN would prefer a collaborative approach to drafting applicable sections of the Rights Impact Assessment and EA report, but suggested that we can largely hold the pen and you can review to provide comments or edits as needed. As I mentioned on our call, we can discuss further in future meetings, but hopefully you have heard from him by now.

Related to the action items, here is the EA Report for the Near Surface Disposal Facility:
<https://www.nuclearsafety.gc.ca/eng/the-commission/hearings/cmd/pdf/CMD22/CMD22-H7.pdf>

It's the first EA report produced by the CNSC for an EA under CEAA 2012. It's quite a long report, but I wanted to highlight some sections that would be of interest, based on our discussion:

- p. 36 breaks down the report structure, of which the Wheeler EA will probably follow a similar format.
- P. 46 and 52 are just two (of many) examples of the "Views expressed" sections, which are found throughout the report. This is example text that we would want to collaborate with ERFN on, in the EA report writing.
- p. 139 is section 9.3 **Assessment of impacts to rights** – I think this is worth a read, to give you a better idea about what we are talking about when we discuss the Rights Impact Assessment (RIA) work and the approach we want to take. Further down on p. 242 you will find the start of the Algonquins of Pikwàkanagàn First Nation RIA, which is included as an appendix, based on what was agreed upon through the consultation process.

Additionally, please see the meeting minutes below. Thanks to Sydney and Wish for capturing these!

Please let me know if you haven't heard from Adam and we can follow up.

Sincerely,
Jes

English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project
October 25, 2022 – 4-5:30PM EST
Attendees: Cheyenna Hunt, Konrad Gorzkowski, Sydney Nickolet, Jes Way, Wish Yen

Wheeler River Project EIS

- Denison submitted the Wheeler River Project EIS on Friday October 21st
 - Currently going through the 30-day conformity review
- CNSC is reviewing the ERFN TLU studies and will share a *What We Heard Report* with ERFN for validation

PFP for Technical Review

- CNSC to share forms required for the PFP application for the technical review
- PFP usually encompasses technical review, Rights Impact Assessment and EA Report drafting – Adam confirmed that would prefer to provide funding for all three activities at once

EIS Technical Review (FIRT)

- The technical review is the validation of information shared from ERFN TLU studies and engagement sessions between ERFN and Denison – it is necessary to ensure information is accurately represented in the EIS
 - CNSC will highlight specific sections of the EIS for ERFN's consideration
- FIRT kick off meeting placeholder to be shared shortly (sent on Oct 27th for Nov 25th)- Cheyenna confirmed that a virtual meeting would be preferable
- Development and validation of Information Requirements (IRs)

- 120 day timeline: The FIRT will have 90 days to conduct their review, and then CNSC staff have about 30 days to compile all of the IRs
- CNSC will reach out to validate and collaborate on IRs submitted from both the FIRT review and the public comment period review. This is currently anticipated for March 2023. The Rights Impact Assessment would kick off around this time as well.
- IRs considered out of scope of the technical review will be provided to Denison through another means, to ensure all concerns are captured

Field Test

- Denison reported an incident to CNSC, the Province of SK and ERFN
 - Denison is currently providing a media release for ERFN to share with the community
- A leak was detected during a walkthrough inspection and was addressed
- ERFN has indicated the notification of incident and response has been satisfactory, but ERFN community members remain concerned regarding the release. This is reminiscent of ammonia releases from Key Lake.
- ERFN has also followed up with Denison to determine if ERFN feedback on basin sizes and suggested barriers were implemented in the current field test design implemented by Denison

Actions:

1. CNSC to share EA reports with examples of Rights Impact Assessment Reports – Completed, see above
2. CNSC will share a draft of the *What We Heard Report* with ERFN in the coming months
3. CNSC to follow up on PFP for FIRT participation in technical review – Completed, Adam is reaching out to Cheyenna to provide application form
4. CNSC will highlight specific sections of the draft EIS in scope for ERFN review (i.e. Indigenous engagement, ERFN specific content, etc.)
5. Jes will forward information on Key Lake to Cheyenna to pass on to Randy and other council members
6. **November 22nd meeting:** discussions on the FIRT process and developing IRs

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division

Canadian Nuclear Safety Commission | Government of Canada

Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#);
[Cheyenna Hunt](#); ['jerry.bernard@erfn.net'](#); ['nvp.mike@sasktel.net'](#); ['wsmith@kineepik.ca'](#);
['bnatomagan@kineepik.ca'](#); ['glenmccallum@mns.work'](#); ['Brent Laroque'](#); ['Shannon Landrie-Crossland'](#);
['garrett.schmidt@yathinene.com'](#); ['shea.shirley@yathinene.com'](#); ['kevin.mercredi@outlook.com'](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); ['d.classen@sasktel.net'](#);
Bcc: ['chief1@birchnarrows.ca'](#); ['norma.catarat@brdn.ca'](#); ['receptionist@mltc.net'](#);
['claire_larock@hotmail.com'](#); ['karenbird@pbcn.ca'](#); ['tmerasty@pbcn.ca'](#); ['bmerasty@pbcn.ca'](#);
['cooksearson@lrib.ca'](#); ['jtsanniejr@pagc.net'](#); ['gchristiansen@lrib.ca'](#); ['cheyenna.hunt@desnedhe.com'](#);
[karenbird@pbcn.ca](#);
Subject: RE: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins
Sent: 2022-11-21 3:42:00 PM

Sorry all- Correction, the deadline for comments is **February 18th 2023**.

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Sent: Monday, November 21, 2022 3:34 PM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

Hi Everyone,

In update to my email below, Canadian Nuclear Safety Commission (CNSC) staff undertook a conformity review of Denison's draft environmental impact statement (EIS) submission, and we have now deemed the submission **complete**. The letter to Denison has been posted to the Canadian Impact Assessment Registry (the Registry), as has the draft EIS and executive summary, along with all appendices and technical support documents.

The CNSC is now seeking comments during a 90-day public comment period on Denison's draft EIS, for the proposed Wheeler River Project. For the purposes of this comment period, the draft EIS and supporting documents can be accessed by visiting [All Records](#) for the project. The EIS can also be found under Key Documents, located on the main Registry page for the [Wheeler River Project](#), as well as here: <https://iaac-aeic.gc.ca/050/evaluations/document/145552>

The draft EIS provides an analysis of the project's potential environmental effects and measures to mitigate those potential impacts. The public comment period gives Indigenous nations and communities, members of the public, and government departments and agencies an opportunity to submit their views in writing to the CNSC on the adequacy of the information presented in the EIS, as measured against the [Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012](#) (the Guidelines), and on the technical merit of the information presented. The Guidelines provide direction to the proponent and identify the information that is required in the EIS.

Written comments must be submitted by **February 18, 2023** to:

Jes Way
Environmental Assessment Officer
Email: wheelerRiver@cnscccsn.gc.ca

All comments on the draft EIS will be posted on the Registry in the language in which they were received. If you have any questions about this or anything else, please don't hesitate to reach out to our team.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Sent: Monday, October 24, 2022 11:28 AM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Received - Conformity Review Underway

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Cheyenna Hunt](#)
Cc: [Yen, Wish](#); [Froess, Ryan](#); [Gorzowski, Konrad](#); [Nickolet, Sydney](#); Manickum, Katherine;
Subject: ERFN/CNSC Monthly Meeting Minutes - January 10 2023
Sent: 2023-01-19 11:34:47 AM

Hi Cheyenna,

Sorry for the delay, but here are the minutes from our January 10th meeting.

I also wanted to let you know, I am hoping to be in Saskatoon the week of March 6th. Still trying to figure out if the first or the second half of the week would work, but I hope there is a day this week that could work to meet with you in person. If there are some days/times that could work, please let me know.

In terms of topics, we'd like to discuss the comments that will be submitted by ERFN, as well as talk more about 5(1)(C) impacts, particularly related to what is identified in the comments and studies provided by ERFN. Further, we could start our discussion on the rights impact assessment work that we will need to start working on (what is coming, how this will look and timelines).

We will see you next week (virtually)!

Thanks,
Jes

English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

January 10th, 2022 11AM-12PM CST

Attendees: Cheyenna Hunt, Ryan Froess, Konrad Gorzowski, Sydney Nickolet, Jes Way, Wish Yen, Katherine Manickum

Important Dates

- **February 10th** – Cheyenna review and send back drafted IRs to the CNSC (questions, gaps in knowledge, concerns identified within scope of ERFN knowledge)
- **February 18th** – SVS review EIS for the public comment period due back to the CNSC à ERFN and SVS are having collaborative chats about the EIS process and the IR drafting. This is not limited to be within the expertise of ERFN – this could be around anything.

Updates on the Project

- CNSC continues to proceed with the technical review of the EIS
- ERFN confirms non-participation in technical meetings for hydrogeological and geological meetings

ERFN would like to know how CNSC staff will be incorporating Indigenous perspectives into technical review

- CNSC is completing What We've Heard Reports for the ERFN studies that have been shared – these reports will be used by technical experts for the EA report
- ISRD will be highlighting information for technical experts
- ISRD will also be reviewing the EIS from the IK knowledge perspective
 - Ex. Ensuring the human health risk assessment in the EIS from ERFN incorporates the traditional food studies completed at the culture camp
- EA Report will be part of the CMD for the hearing
 - Focus will be on significant adverse effects on people and the environment
 - Will safety for cultural protection be considered equally?
 - If there are still significant adverse effects to the list below, CNSC will evaluate if the mitigation measures have considered the concerns highlighted by ERFN.
 - (i) health and socio-economic conditions,
 - (ii) physical and cultural heritage,
 - (iii) the current use of lands and resources for traditional purposes, or
 - (iv) any structure, site or thing that is of historical, archaeological, paleontological or architectural significance
 - Discussions will occur between Nations and Crown if there remain concerns
- Licensing process (parallel)
 - Licensing process is focused on safety and protection of the environment
- ERFN reiterates good engagement with Denison and the community has not had any concerns regarding engagement to date
- ERFN happy to be reviewer on the Rights Impact Assessment Report

Collaboration with Ya'thi Néné

- ERFN will be engaging with YTLRO to discuss project impacts on each nation (Friday meeting)

- Treaties are not a good indication of land use by Nations – it was established in the past by the Crown and the Province, but does not reflect how land users travel
- Goal is to establish a map of land usage between ERFN and YTLRO
- Historically there was sufficient resources available to share; but now that impact benefit agreements have a financial monetary value attached, it needs to be reviewed
 - Non-status Indians have been adopting Métis culture

Terms of Reference

- CNSC wants to set up a Terms of Reference to build towards a long-term relationship
- CNSC to review whether there is funding available for lawyer to review the ToR
- Terms of reference would include workplans for IEMP, ROR, land use engagement for CNSC staff or project engagement

Action items

- CNSC and ERFN to discuss IRs at the next monthly meeting (Jan 24th)

From: [Cheyenna Hunt](#)
To: [Yen, Wish](#)
Subject: RE: 2023-01-24 - January ERFN-CNSC monthly meeting minutes
Sent: 2023-02-09 12:49:26 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Thank you!

From: Yen, Wish <wish.yen@cnscccsn.gc.ca>
Sent: February 9, 2023 9:43 AM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Subject: 2023-01-24 - January ERFN-CNSC monthly meeting minutes

Good morning Cheyenna,

I apologize for the delay in sharing our notes, but please find the monthly meeting minutes for January below for your consideration.

Thank you,

Wish Yen (she, her, elle)

Environmental Assessment Officer | Agente en évaluation environnementale
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
wish.yen@cnscccsn.gc.ca | 343.553.2233



English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

January 24, 2023 2:30-3:00PM CST

Attendees: Cheyenna Hunt, Ryan Froess, Konrad Gorzkowski, Katherine Manickum, Jes Way and Wish Yen

ERFN-YNLRO Meeting

- Collaborating to ensure alignment on the Key, McArthur and Rabbit re-licensing interventions in June 2023
- ERFN and YNLRO met to discuss and determine the primary affected communities for projects in Northern Saskatchewan

ERFN-KML engagement

- ERFN is creating a new reserve at km 67 and is required to consult to KML
 - Consultation process with Justice, Transport Canada, other federal departments, Province of Saskatchewan and KML is underway
- The new reserve encompasses the trap line of the second Chief of ERFN, George (trap line is still used by his family to date)

ERFN-Denison

- Quarterly exploration agreement meetings have been underway
- Full update from Denison to be provided at the beginning of March, including forecasts for future exploration
- ERFN has no concerns regarding the Wheeler River Project to date as there is also an environmental culture monitor present at the site

Wheeler River project update

- Technical review is underway with SMEs participating in technical meetings
- Technical reviews by ERFN are underway and any IRs will be submitted using the template provided by CNSC
 - Denison funded reports included stories from the community by SVS and these stories were verified and compiled into a summarized report and shared with Denison
 - ERFN does find the review process repetitive, but it is positive that there have been no discrepancies with the incorporation of ERFN information (and intends to re-review to ensure this is the case throughout)
- Public comments will be submitted by SVS
 - There are no specific format for the comments, they can be in a report with tables or in bullet points (whatever the preference)
 - ERFN may reach out to community members for feedback on the EIS as honorariums have been approved

CNSC funding

1. Wheeler River Project specific funding
 - a. FIRT funding – announcement will be made shortly
 - Issues and concerns tables
 - Engagement and review for the Rights Impact Assessment report
 - Outreach and engagement on 5(1)(c) impacts
 - b. Additional funding opportunity for review of the Environmental Assessment report
2. Terms of Reference funding to discuss at future meeting once ERFN has time to review the TOR template sent by CNSC
3. New funding program to help build capacity
 - a. Anticipated to run over 5 years
 - b. Roll out is planned for April

Action Items

- CNSC will provide a presentation on the new funding program in April and invite Adam L to present
- Discussion on Long Term Agreement for future monthly meeting after Denison Draft EIS is completed

-----Original Appointment-----

From: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>

Sent: September 2, 2021 2:56 PM

To: Froess, Ryan; Cheyenna Campbell (cheyenna.campbell@desnedhe.com); Way, Jessica; Salman Akhter (salman.akhter@cnscccsn.gc.ca); Wish Yen (wish.yen@cnscccsn.gc.ca)

Cc: Mossop, Veronica; Adam Levine (adam.levine@cnscccsn.gc.ca); DeCoste, Laura; Cheyenna Campbell; Gorzkowski, Konrad; Nickolet, Sydney; Manickum, Katherine

Subject: ERFN/CNSC - Denison Wheeler River Project - Monthly meetings

When: January 24, 2023 2:00 PM-3:30 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

Hi Cheyenna,

As discussed I am resending our monthly meetings as requested.

Proposed Monthly Standing Agenda

ERFN - Update on the Denison Wheeler River Project

CNSC - Update on the Denison Wheeler River Project

CNSC/ERFN - Opportunities for collaboration and to work together (ToR, Rights Impacts Assessment)

Next Monthly Meeting – Topics of Interest and Action Items

We will follow-up with the meeting minutes and any action items from our meetings monthly.

Thanks,
Ryan

Microsoft Teams meeting

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From: [Boser, Sydney](#)
To: [Boser, Sydney](#)
Subject: RE: ERFN Wheeler River Project Environmental Impact Statement Technical Review
Sent: 2025-07-22 9:32:02 AM

From: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Sent: Friday, March 3, 2023 6:05 PM
To: Way, Jessica <jessica.way@cnsccsn.gc.ca>; Froess, Ryan <ryan.froess@cnsccsn.gc.ca>
Cc: Carolanne Inglis-McQuay <cinglismcquay@denisonmines.com>; Jamie Dickson <1dicksonjamie@gmail.com>; Larry Innes <LInnes@oktlaw.com>
Subject: ERFN Wheeler River Project Environmental Impact Statement Technical Review

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Please see attachment.

Cheyenna R. Hunt B.A., LL.B.
Director, Lands & Consultation

English River First Nation
Urban Office
321 - 2555 Grasswood Road
Saskatoon, Sk. S7T0K1

Cell: 306.291.6808
Email: cheyenna.hunt@desnedhe.com

From: [Yen, Wish](#)
To: [Way, Jessica](#); [Froess, Ryan](#); [Nickolet, Sydney](#); [Cheyenna Hunt](#);
Cc: [Gorzowski, Konrad](#); Manickum, Katherine;
Subject: 2023-03-09 - ERFN-CNSC meeting minutes on the Wheeler River Project
Sent: 2023-03-17 2:51:42 PM

Good afternoon Cheyenna,

Please find the meeting minutes from our March 9th meeting below for your review.

Thank you and have a wonderful weekend!

Wish Yen (she, her, elle)

Environmental Assessment Officer | Agente en évaluation environnementale
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
wish.yen@cnscccsn.gc.ca | 343.553.2233



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English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

March 9th, 2023 10:30-1PM CST

Attendees: Cheyenna Hunt, Ryan Froess, Konrad Gorzowski, Sydney Nickolet, Jes Way and Wish Yen

Next steps

- Engagement activities that will be drafted by CNSC and would require review and validation from ERFN
 - **Issues and concerns tables**
 - **What we heard report**
 - **Rights Impact Assessment**
 - **Draft EA report sections**
- FIRT Information requests
 - ERFN has identified an error within the EIS, but Denison has confirmed they will be correcting the error
 - ERFN feels their rights and interests are disproportionately represented by 1 land user who has since passed away. As the impacts within the EIS are represented by the specific land user, ERFN is worried and wants to ensure that Denison will continue to protect the collective rights of all ERFN members.
 - The collective rights of the ERFN and all aspects referencing land use are equated to the one user in the EIS and ERFN wants to ensure that the collective rights of ERFN won't be infringed on because the specific land user has passed away
 - CNSC will draft IRs to capture the above concerns and share with ERFN for validation before incorporating into the FIRT technical review to ensure they are captured on the record and share with Cheyenna for approval before submitting

ERFN and consultant representation

- ERFN is raising concerns that SVS standards and ERFN standards are different where ERFN feels that SVS is conveying a more negative tone projecting that ERFN is not supportive of this project
 - ERFN reviewed the public comment submission from SVS twice to ensure the report aligned with ERFN views
 - Denison was provided the draft in advance as a courtesy so they can prepare to respond to questions raised in the submission
- SVS and ERFN had the opportunity to request funding for baseline studies and this was not accurately reflected in the report
- SVS's identification of water impacts due to leaching and perceived impacts are represented more negatively than ERFN's views reflect
- Patrick (Source consultants) aligns with ERFN community members better and with a scientific lens

ERFN review of draft EIS

- EIS felt repetitive, but ERFN is pleased that Denison understands the concerns raised by Nations related to impacts to the water
- Protection of aquatic environment is a key topic of concern within the community
 - Perceived fear and unknowns in the technologies related to the neutralization process and leaving water on site still have a negative connotation with community members
 - Community members always start with a "No" view on projects (uranium + water impacts = automatic no)
 - Industry needs to understand this perspective and work with the community and scientists to communicate and alleviate concerns
 - Risk of removing uranium from the ground using a water-based process which involves recycling and returning water to the ground upstream of valuable sites to ERFN land users is a big concern
 - Accidents and malfunctions resulting in leaks are another concern – the leak during the field test in 2022 emphasized member concerns
- ERFN members were ~~are~~ not happy with how Cameco conducted consultation and engagement in the past on current mine sites in ERFN territory. Key Lake, McArthur River and Rabbit Lake Operations were placed onto ERFN lands without consultation – this project is the first project that ERFN has an opportunity to participate and be heard
- Cumulative effects of the mines should also be considered as increases in traffic, road usage and footprint once new roads are constructed are also a concern
 - Even if the road isn't present, ERFN members would still be using this land long into future generations and wants to ensure its protected.
- ERFN is pleased with how Denison has incorporated detailed mapping and ERFN knowledge and stories
- ERFN is still hesitant about the Wheeler River project as the technology is all new . The community members are supportive of the economic benefits that will come with the project but Denison still has work to do in order to gain support from ERFN for the proposed project

Views Expressed by ERFN

- ERFN reiterates that they are the primary land users of the area surrounding the project. ERFN reserves and land users have consistently been present in the area, rather than just being closer to the project site
 - ERFN reserves were selected in this area because community members use the land
- ERFN accepts that some land-use overlaps between Nations have always been there – but the primary land users/trappers are ERFN community members
- N-16 and N-18 trapping zones only contain ERFN members and a few from La Ronge
- ERFN does not support KML's comments regarding land claims or claims by YNLRO and MN-S that their members are using trapping lines N16 and N18 when it has always been ERFN members
 - ERFN does not believe that they should be able to claim time immemorial when the Métis community of Pinehouse has only been there since 1940s
- **Proximity does not define land use** – a lot of people didn't use the land until the road was built and ERFN has used it long before that.
 - This represents a colonial view where lands stakes were determined by colonists rather than negotiated by Nations
 - Land use should be determined by traditional and historical use rather than proximity

Questions to be addressed

- Water neutralization presented in the EIS and how that will impact the community
- What standards does the CNSC use for water quality? Can Denison can bring the water back to baseline and if not, what are the mitigation measures?
 - Usually, the Canadian Council of Ministers of the Environment (CCME) guidelines are expected to be followed federally (various guidelines)
 - The CNSC and Federal reviewers are interested in Denison's proposed Remediation criteria, but staff in this meeting were unable to speak to how these, or the CCME guidelines would compare to baseline
- Is it realistic for water quality to be returned back to the baseline? What are CNSC expectations and standards upon remediation?
- CNSC staff noted that they could arrange a meeting with more technical staff to answer these types of questions – for instance, staff from our Environmental Risk Assessment division (ERAD), or Health Sciences and Environmental Compliance Division (HSECD)

Outreach events with ERFN communities

- Future virtual zoom meeting for the community on:
 - The EA process, assessment and how CNSC regulates – Cheyenna noted that this does not necessarily need to be in person
 - CNSC safety standards and how they align or differ with ERFN's standards for safety

Action Items

- CNSC will draft IRs for ERFN to review and then include in the FIRT technical review submission to Denison (Complete – waiting for Cheyenna reply)
 - CNSC will share posting of the technical review IRs after March 21st
 - CNSC will organize a virtual meeting for ERFN members with ERAD and HSECD SMEs to discuss water quality standards and CNSC staff assessment of the Wheeler River EIS – to further discuss in our next monthly meeting
-

-----Original Appointment-----

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>

Sent: February 9, 2023 12:12 PM

To: Way, Jessica; Froess, Ryan; Nickolet, Sydney; Yen, Wish; Cheyenna Hunt

Cc: Gorzkowski, Konrad; Manickum, Katherine

Subject: ERFN/CNSC Meeting in Person

When: March 9, 2023 11:00 AM-2:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Microsoft Teams Meeting; / ERFN or CNSC Office

Hi all,

Getting some time in the calendar for our March meeting.

Tentative agenda:

- Comments from ERFN on the Wheeler River draft EIS
- Process and next steps for Rights Impact Assessment Work
- Issues tracking tables
- 5(1)(c) impacts

Thanks,

Jes

—

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From: [Wheeler River Project - Projet de Wheeler River](#)
[Way, Jessica](#); [Wheeler River Project - Projet de Wheeler River](#); [marcus.edino@ec.gc.ca](#); [angus.calderhead@ec.gc.ca](#); [cari-lyn.epp@ec.gc.ca](#); [julie.c.anderson@hc-sc.gc.ca](#); Dutchak, Cassidy (HC/SC); [Hancock, Terina](#); [Walker](#); Clarke, Christina; Kim, Duck (ECCC);
To: [Cheyenna Hunt](#); [Lam, Jeffrey](#); [Lane, Rachel](#); [Sauvé, Daniel](#); [Zheng, Qinghuai](#); [Froess, Ryan](#); [Boser, Sydney](#); [Gorzowski, Konrad](#); [Mistry, Rajesh](#); Khanan, Rabya; Barker, Jackie (TC/TC); [Dodkin, Christina](#); [Corcoran, Angela](#); [ja-ei@hc-sc.gc.ca](#); [Yen, Wish](#); [paul.partridge@hc-sc.gc.ca](#); [Kwamena, Nana-Owusua](#); Ali, Nardia (ECCC); [Aimann Sadik](#) ([aimann.sadik@gov.sk.ca](#)); [Dereniowski, Jeff](#) ENV; [Purvis, Caroline](#); [Fabian Mendoza, Melissa](#); [Levine, Adam](#); [Ramsey, Renee](#); Burta, John; [Burton, Patrick](#); [Way, Jessica](#); [Akhter, Salman](#);
Cc: [Burton, Patrick](#); [Way, Jessica](#); [Akhter, Salman](#);
Subject: RE: Wheeler River Project EIS Technical Review Kick-Off - November 21, 2022
Attachments: E-DOCS-#6858049-v8-2022-10-21-Tracker-Collated_IR_Table-Wheeler_River_EA.DOCX; E-DOCS-#6858048-v4-2022-10-21-Tracker-Collated_advice_to_proponent_table-Wheeler_River_EA.DOCX; 2023-03-20 - Letter to Denison with Conclusions for Wheeler River EIS Technical Review - With Annexes - SIGNED.pdf;
Sent: 2023-03-20 5:53:00 PM

Hi All,

I am sending along this update to let you know that we have finalized our review of Denison's Wheeler River EIS. I have sent them the attached letter with conclusions, a table of IRs and a table of advice to the proponent, and it will soon be posted to the [Canadian Impact Assessment Registry for the project](#). The combined PDF attached is what we sent to Denison, versions of which will be posted to the registry.

Thanks to you and your teams for your contributions, for attending numerous meetings, meeting our deadlines and for those of you who were responding to my last minute questions over the last few days – I really appreciate the quick turnaround on the responses. More to come on next steps of the process but I wanted you all to be aware before these documents were posted publicly.

Note, I've also attached a Word version of the IRs and advice to the proponent which contains the original reference codes you provided when you shared your review comments, alongside the final reference number. I am sharing so that you have this for reference, but please don't hesitate to let me know if you have any questions or concerns.

Thanks,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division

Canadian Nuclear Safety Commission | Government of Canada

Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: Way, Jessica

Sent: Monday, January 16, 2023 12:16 PM

To: Wheeler River Project - Projet de Wheeler River ; [marcus.edino@ec.gc.ca](#); [angus.calderhead@ec.gc.ca](#); [cari-lyn.epp@ec.gc.ca](#); [julie.c.anderson@hc-sc.gc.ca](#); [Cassidy.Dutchak@hc-sc.gc.ca](#); [Hancock, Terina](#) ; [Walker](#) ; [Clarke, Christina](#) ; [Kim, Duck](#) (ECCC) ; [Cheyenna Hunt](#) ; [Akhter, Salman](#) ; [Lam, Jeffrey](#) ; [Lane, Rachel](#) ; [Sauvé, Daniel](#) ; [Zheng, Qinghuai](#) ; [Froess, Ryan](#) ; [Nickle, Sydney](#) ; [Gorzowski, Konrad](#) ; [Mistry, Rajesh](#) ; [Khanan, Rabya](#) ; [Barker, Jackie](#) (TC/TC) ; [Dodkin, Christina](#) ; [Corcoran, Angela](#)

Cc: [ja-ei@hc-sc.gc.ca](#); [Yen, Wish](#) ; [paul.partridge@hc-sc.gc.ca](#); [Kwamena, Nana-Owusua](#) ; [Ali, Nardia](#) (ECCC) ; [Aimann Sadik](#) ([aimann.sadik@gov.sk.ca](#)) ; [Dereniowski, Jeff](#) ENV ; [Purvis, Caroline](#) ; [Fabian Mendoza, Melissa](#) ; [Levine, Adam](#) ; [Ramsey, Renee](#) ; [Burta, John](#) ; [Burton, Patrick](#)

Subject: RE: Wheeler River Project EIS Technical Review Kick-Off - November 21, 2022

Correction, the deadline is Feb 10th. Apologies for any confusion.

Jes

From: Way, Jessica

Sent: Monday, January 16, 2023 11:48 AM

To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnsccsn.gc.ca>; [marcus.edino@ec.gc.ca](#); [angus.calderhead@ec.gc.ca](#); [cari-lyn.epp@ec.gc.ca](#); [julie.c.anderson@hc-sc.gc.ca](#); [Cassidy.Dutchak@hc-sc.gc.ca](#); [Hancock, Terina](#) <Terina.Hancock@dfo-mpo.gc.ca>; [Walker](#) <walker.smith@NRCan-RNCan.gc.ca>; [Clarke, Christina](#) <christina.clarke@NRCan-RNCan.gc.ca>; [Duck](#) (ECCC <Duck.Kim@ec.gc.ca>; [Cheyenna Hunt](#) <cheyenna.hunt@desnedhe.com>; [Akhter, Salman](#) <salman.akhter@cnsccsn.gc.ca>; [Lam, Jeffrey](#) <jeffrey.lam@cnsccsn.gc.ca>; [Lane, Rachel](#) <rachel.lane@cnsccsn.gc.ca>; [Sauvé, Daniel](#) <daniel.sauve@cnsccsn.gc.ca>; [Zheng, Qinghuai](#) <qinghuai.zheng@cnsccsn.gc.ca>; [Froess, Ryan](#) <ryan.froess@cnsccsn.gc.ca>; [Nickle, Sydney](#) <sydney.nickle@cnsccsn.gc.ca>; [Gorzowski, Konrad](#) <konrad.gorzowski@cnsccsn.gc.ca>; [Mistry, Rajesh](#) <rajesh.mistry@cnsccsn.gc.ca>; [Khanan, Rabya](#) <rabya.khanan@cnsccsn.gc.ca>; [Barker, Jackie](#) (TC/TC) <Jackie.Barker@tc.gc.ca>; [Dodkin, Christina](#) <christina.dodkin@cnsccsn.gc.ca>; [Corcoran, Angela](#) <angela.corcoran@cnsccsn.gc.ca>

Cc: [ja-ei@hc-sc.gc.ca](#); [Yen, Wish](#) <wish.yen@cnsccsn.gc.ca>; [paul.partridge@hc-sc.gc.ca](#); [Kwamena, Nana-Owusua](#) <nana-owusua.kwamena@cnsccsn.gc.ca>; [Ali, Nardia](#) (ECCC) <Nardia.Ali@ec.gc.ca>; [Aimann Sadik](#) ([aimann.sadik@gov.sk.ca](#)) <aimann.sadik@gov.sk.ca>; [Dereniowski, Jeff](#) ENV <Jeff.Dereniowski@gov.sk.ca>; [Purvis, Caroline](#) <caroline.purvis@cnsccsn.gc.ca>; [Fabian Mendoza, Melissa](#) <melissa.fabianmendoza@cnsccsn.gc.ca>; [Levine, Adam](#) <adam.levine@cnsccsn.gc.ca>; [Ramsey, Renee](#) <renee.ramsey@cnsccsn.gc.ca>; [Burta, John](#) <john.burta@cnsccsn.gc.ca>; [Burton, Patrick](#) <patrick.burton@cnsccsn.gc.ca>

Subject: RE: Wheeler River Project EIS Technical Review Kick-Off - November 21, 2022

Hi All,

Just a reminder that the deadline for IRs from all teams is **February 9th, 2023**.

I also wanted to share, attached are the EIS Review Comments that have resulted from the Province of Saskatchewan's Environmental Assessment Review. To any leads, please share this with your respective teams as I have not included all division members or participants from other federal departments that are involved in the review.

If you have any questions or concerns, please let me know.

Thanks,

Jes

From: Wheeler River Project - Projet de Wheeler River

Sent: Monday, November 21, 2022 7:05 PM

To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnsccsn.gc.ca>; [Lisa](#) <Lisa.Wren@dfo-mpo.gc.ca>; [Heather Cherry](#) <heather.cherry@pc.gc.ca>; [marcus.edino@ec.gc.ca](#); [angus.calderhead@ec.gc.ca](#); [cari-lyn.epp@ec.gc.ca](#); [adam.downing@tc.gc.ca](#); [anita.champagnegudmundson@tc.gc.ca](#); [julie.c.anderson@hc-sc.gc.ca](#); [Cassidy.Dutchak@hc-sc.gc.ca](#); [ja-ei@hc-sc.gc.ca](#); [Walker](#) <walker.smith@NRCan

RNCan.gc.ca; Duck (ECCC <Duck.Kim@ec.gc.ca>); Cheyenna Hunt <cheyenna.hunt@desnedhe.com>; Akhter, Salman <salman.akhter@cnscccsn.gc.ca>; Lam, Jeffrey <jeffrey.lam@cnscccsn.gc.ca>; Lemieux, Alexander <alexander.lemieux@cnscccsn.gc.ca>; Lane, Rachel <rachel.lane@cnscccsn.gc.ca>; Randhawa, Kristi <kristi.randhawa@cnscccsn.gc.ca>; Sauvé, Daniel <daniel.sauve@cnscccsn.gc.ca>; Zheng, Qinghui <qinghui.zheng@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Mistry, Rajesh <rajesh.mistry@cnscccsn.gc.ca>; Ramsey, Renee <renee.ramsey@cnscccsn.gc.ca>

Cc: 'ia-ei@hc-sc.gc.ca' <ia-ei@hc-sc.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Paul, Partridge <paul.partridge@hc-sc.gc.ca>; Kwamena, Nana-Owusua <nana-owusua.kwamena@cnscccsn.gc.ca>; Ali, Nardia (ECCC) <Nardia.Ali@ec.gc.ca>; Aimmann Sadik (aimann.sadik@gov.sk.ca) <aimann.sadik@gov.sk.ca>; Dereniowski, Jeff ENV <Jeff.Dereniowski@gov.sk.ca>; Purvis, Caroline <caroline.purvis@cnscccsn.gc.ca>; Fabian Mendoza, Melissa <melissa.fabianmendoza@cnscccsn.gc.ca>; Levine, Adam <adam.levine@cnscccsn.gc.ca>; Lam, Jeffrey <jeffrey.lam@cnscccsn.gc.ca>

Subject: Wheeler River Project EIS Technical Review Kick-Off - November 21, 2022

Importance: High

Hi Everyone,

As noted in previous emails, on October 21, 2022 Denison submitted the EIS package for the proposed Wheeler River Project. CNSC staff undertook a conformity review of the submission, and we have now deemed the submission **complete**, for the purposes of technical review. The letter to Denison and documents have all been posted on the [Canadian Impact Assessment Registry for the project](#).

This means the EIS technical review by the Federal-Indigenous Review Team can begin (**starting today, November 21st, 2022**).

Finding the Documents:

The documents that form the submission under review include the following:

- EIS for the Wheeler River Project, which includes all TSDs as appendices
- Wheeler River EIS Executive Summary
- Indigenous Engagement Report

These documents have been made available by Denison on their SFTP site: <https://denisonmines.egnyte.com/f/y1b1e47kua>. The documents are located in the folders titled 'For External Distribution', and no password is required. Here are the download instructions:

1. Go to the link above.
2. Select "Download Folder" from the top-right.
3. Extract the folder from the downloaded zip archive to your computer.
4. Please use Adobe Reader or similar PDF reader/viewer for viewing the PDF files and using the Roadmap. If you do not have a PDF reader installed, you may download one from Adobe at <https://get.adobe.com/reader/>

Technical review details:

Your assistance is requested to verify the technical completion and accuracy of the submission. You are hereby requested to review the draft EIS, within the mandate and scope of your organization.

To assist in your technical review, please follow the detailed guidance of the "Additional information on technical review of the EIS and preparation of the EA report" document, attached to this email. Consider the following:

- a. Please limit the review to assessing potential effects and impacts of the project on the environment under CEAA 2012 within your organization's mandate.
- b. The scope of the technical review is to ensure the EIS and supporting documents contain complete, sufficient and accurately analyzed information.
- c. Should your technical review prompt questions, please refer to section 5 on page 3 of the "Additional information on technical review of the EIS and preparation of the EA report #6438324" attached to generate IRs.

Templates:

You will find attached the following templates. For the whole team:

- A template for Information Requirements (5906600) – This can be used for compiling your department or division's IRs, following your review of the EIS and supporting documents
- A template for Advice to the proponent (5906585) – This can be used for any additional advice to the proponent, for cases where the comment does not qualify as an IR
- Guidance for the EIS Review Process under CEAA 2012 (5908054)
- Additional information on EIS Technical review Guidance (6438324) – this notes that it is directed to Indigenous participants on the FIRT, however it does contain information that other participants will find useful

For CNSC SMEs: *Short Instructions for Writing content for the EA Report* (6631772) – it is quite early for this information, but sharing so that CNSC staff who will be drafting Environmental Effect Reports can be thinking about it in advance.

Timeline:

The FIRT has approximately 12 weeks to conduct their EIS technical review. With this in mind, please provide the results of your technical review by **Friday February 10th, 2023**, including management approval if required. This will allow EAD to collate inputs and get final management approval, in order to respond to the proponent by March 20th, 2023. This timeline has already extended to be a month longer than our regular standard, so there will be no possibility of extensions. If you have concerns that you will not be able to meet this deadline, please contact me as soon as possible.

I will be reaching out to the team approximately half way through the review to see how things are going and to answer any questions you might have. I can also arrange for meetings with Denison, CNSC and/or between members of the FIRT as needed, so please don't hesitate to reach out if you would like to discuss particular topics throughout the technical review period.

120 Day draft EIS technical review	Timeline	Dates	
Technical Review Begins (day 1)		Nov 21, 2022	
FPIRT Conducts EIS Technical Review (All participants)	12 weeks		
Kick off meeting with all FPIRT members + Walk through by Denison	2-4 days in	Nov 25, 2022	Presentation by Denison, and overview of the technical review/timelines/questions
*Meeting part way through TR to see if technical meetings are needed	~1 month in	~first week of January 2023	
*Check-in w/ FPIRT	~7-8 weeks in	~end of Jan	Reminder of upcoming deadline
*Technical Discussions with Denison (as needed)	Throughout	TBD	Earlier the better
FPIRT Review complete and any additional IRs due to CNSC EA Lead	milestone	Feb 10, 2023	
EAD CNSC Lead compiles review of FPIRT, verifies information, asks questions, etc.	2.5 wks	Mar 8, 2023	We would likely need to reach out for questions/clarity over this 2.5 week period
CNSC Internal Approvals of IRs, letter and assessment / EAD DIR Review	~1.5 wks	Mar 16, 2023	
Revisions following EAD DIR review and admin formatting	3 days	Mar 20, 2023	
Send IRs to Denison (day 120)	milestone	Mar 20, 2023	Letter to Denison, informing of results

Kick Off Meeting:

A meeting will be held on **November 25, 2022** so that Denison may walk the FIRT through the submission. If for some reason you do not have this invite, please let me know! I'm hoping that everyone can take a bit of time to review the structure of the EIS and supporting documents in advance, as this will be a good opportunity to seek clarification, and ask any questions that you might have for Denison at the start of the technical review.

If you have any questions regarding the review, please contact either myself (contact info below) or my colleague Wish Yen (wish.yen@cnscccsn.gc.ca).

Thank you,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division

Canadian Nuclear Safety Commission | Government of Canada

jessica.way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Wheeler River Project - Projet de Wheeler River WheelerRiver@cnscccsn.gc.ca

Sent: Monday, October 24, 2022 10:48 AM

To: Wheeler River Project - Projet de Wheeler River WheelerRiver@cnscccsn.gc.ca; Lisa Lisa.Wren@dfo-mpo.gc.ca; Heather Cherry heather.cherry@gc.gc.ca; marcus.edino@ec.gc.ca; angus.calderhead@ec.gc.ca; cari-lyn.epp@ec.gc.ca; adam.downing@tc.gc.ca; anita.champagnegudmundson@tc.gc.ca; julie.c.anderson@hc-sc.gc.ca; Cassidy.Dutchak@hc-sc.gc.ca; ia-ei@hc-sc.gc.ca; Walker walker.smith@NRCan-RNCan.gc.ca; Duck (ECCC Duck.Kim@ec.gc.ca; Cheyenna Hunt cheyenna.hunt@desnedhe.com

Cc: paul.partridge@hc-sc.gc.ca; Kwamena, Nana-Owusua Nana-Owusua.Kwamena@cnscccsn.gc.ca; Yen, Wish wish.yen@cnscccsn.gc.ca; Ali, Nardia (ECCC Nardia.Ali@ec.gc.ca; Aimann Sadik (aimann.sadik@gov.sk.ca) aimann.sadik@gov.sk.ca; Dereniwski, Jeff ENV Jeff.Dereniwski@gov.sk.ca

Subject: Wheeler River Project EIS Received - Conformity Review Underway

Hi Everyone,

To update you on the status of the Wheeler River Project, Denison submitted the draft EIS package on Friday, October 21, 2022.

CNSC staff are beginning our 30 day conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If we proceed to technical review, a kick-off meeting with CNSC and Denison will take place early in the process - I am going to try and get a placeholder in the calendar for the week of November 21st or 28th. That being said, the soonest that the Federal Indigenous Review Team would be requested to participate in the EIS technical review is November 21, 2022. This would mean that your review would need to be completed by February 17, 2023.

More information to come along with the outcome of the conformity review, but please don't hesitate to let me know if you have any questions or comments about this project and the conduct of the EA.

Best regards,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division

Canadian Nuclear Safety Commission | Government of Canada

jessica.way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Yen, Wish](#)
To: [Cheyenna Hunt](#)
Cc: [Gorzowski, Konrad](#); [Nickolet, Sydney](#); [Froess, Ryan](#); [Way, Jessica](#);
Subject: 2023-03-28 ERFN-CNSC monthly project meeting for the Wheeler River Project
Sent: 2023-04-12 4:24:00 PM

Good afternoon Cheyenna,

I apologize for this delayed meeting minute – I completely forgot to share it the week after our meeting. Please don't hesitate to reach out if there is anything that needs to be corrected.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer | Agente en examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

wish.yen@cnscccsn.gc.ca | 343.553.2233



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- English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

March 28, 2023 2-3:30PM CST

Attendees: Cheyenna Hunt, Ryan Froess, Konrad Gorzowski, Sydney Nickolet, Jes Way, Wish Yen

ERFN-Denison quarterly meeting held on March 21st

- Denison has informed ERFN that they are aiming to revise the EIS as soon as possible, prioritizing responses to the IRs
 - ERFN provided Denison with a draft of the SVS comments prior to submission for the public comment period, so Denison was aware of the issues and concerns to be raised.
- Denison provided an update on the project to new ERFN ancestral lands committee members
 - Denison will be providing a similar project update to ERFN leadership on March 31st
- The ERFN community has concerns related to nuclear projects due to risks of contamination and impacts on Rights. Denison should be aiming to shift the community's views on the project towards a supportive position through engagement and outreach (Move the community's views from no to yes)
- Rights Impact Assessment
 - What is CNSC's community standards for assessing a Nation's impact by a project for the RIA?
 - ERFN reviewed other public comments and noted that general feedback, integration and consultation from other Nations is that they aren't sufficiently incorporated throughout the EIS. ERFN raises concern that other Nations who may not be impacted by the project have been impeding their negotiating power with Denison and wants to better understand how the CNSC will be evaluating the project's impact on other Nations and communities.
 - CNSC recognizes that ERFN is a primary impacted Nation by the Wheeler River Project. CNSC staff are open to a separate meeting to provide information on the CNSC process for identifying Indigenous communities impacted by a proposed projects.
 - ERFN confirmed that SVS will not be participating in the RIA report and that CNSC can draft sections and ERFN staff will review.

ERFN

- ERFN will be making a presentation to elders and community members regarding the Wheeler River Project and the EA process which is taking place on Saturday April 1st
- ERFN requests an estimated timeline for the EA process and the licensing process to present to the community with general months (complete)

ERFN-CNSC engagement

- CNSC is open to providing additional information to ERFN if needed in follow-up meeting with ISRD on new capacity funding, RIA and other topics of interest moving forward.
 - CNSC will be hosting Indigenous outreach session on the 2022 UMMD ROR on September 20, 2023 in Saskatoon. More details to follow.
 - Patrick and Kavita will be in Saskatoon in May of 2023 and meeting with ERFN.
 - ISRD to set up a meeting to discuss the topics above with ERFN (complete)

Re-licensing hearing for McArthur River, Key Lake and Rabbit Lake Operations

- ERFN wants to understand whether the CNSC will reassess their recommendation to the Commission as Cameco has amended the renewal request from indefinite licence to a 20-year licence
- ERFN feels like Cameco strategically requested their license term and that this was a negotiation tactic
 - CNSC has the capacity to recommend up to a certain amount of time based on technical reviews, but ultimately it will be the Commission who makes the decision and we encourage ERFN to present to the Commission.
 - CNSC has offered and would be happy to set up a meeting with the UMM licensing team working on the relicensing to discuss the projects before the intervention submission deadline

Anticipated timelines

- CNSC does not anticipate Denison will be ready to submit responses to IRs until fall at the earliest
- Timelines for the final EIS would be approximated for summer 2024 or later

Action Items

- CNSC will set up a separate meeting for RIA determination
 - CNSC will share guidance documents for the RIA report and set up a meeting in coming months
- CNSC is open to setting up a separate meeting for the relicensing of the McArthur River, Key Lake and Rabbit Lake operations if ERFN would like?

- CNSC will invite SME for the April monthly meeting to discuss the Water Quality Standards
 - ERFN will invite Robin to the meeting to participate

-----Original Appointment-----

From: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>

Sent: September 2, 2021 2:56 PM

To: Froess, Ryan; Cheyenna Campbell (cheyenna.campbell@desnedhe.com); Way, Jessica; Salman Akhter (salman.akhter@cnscccsn.gc.ca); Wish Yen (wish.yen@cnscccsn.gc.ca)

Cc: Mossop, Veronica; Adam Levine (adam.levine@cnscccsn.gc.ca); DeCoste, Laura; Cheyenna Campbell; Gorzkowski, Konrad; Nickolet, Sydney

Subject: ERFN/CNSC - Denison Wheeler River Project - Monthly meetings

When: March 28, 2023 2:00 PM-3:30 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

Hi Cheyenna,

As discussed I am resending our monthly meetings as requested.

Proposed Monthly Standing Agenda

ERFN - Update on the Denison Wheeler River Project

CNSC - Update on the Denison Wheeler River Project

CNSC/ERFN - Opportunities for collaboration and to work together (ToR, Rights Impacts Assessment)

Next Monthly Meeting – Topics of Interest and Action Items

We will follow-up with the meeting minutes and any action items from our meetings monthly.

Thanks,

Ryan

Microsoft Teams meeting

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From: [Yen, Wish](#)
To: cheyenna.hunt@desnedhe.com
Cc: [Froess, Ryan](#); [Williamson, Elizabeth](#); [Gorzkowski, Konrad](#); [Nickolet, Sydney](#); [Way, Jessica](#);
Subject: 2023-05-23-ERFN to CNSC monthly meeting minutes
Sent: 2023-08-09 7:32:39 AM

Good morning Cheyenna,

I think the meeting notes from May weren't shared – please find them below for your review.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnsccsn.gc.ca | 343.553.2233



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English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

May 23, 2023 2-3:30PM CST

Attendees: Cheyenna Hunt, Ryan Froess, Konrad Gorzkowski, Sydney Nickolet, Jes Way, Wish Yen and Elizabeth Williamson

CNSC Project Update

- Denison plans to submit responses to the information requests at the end of June 2023
 - Denison will be providing responses in the IR table shared by CNSC, with revised text proposed in the table
 - Denison will not be providing a fully revised EIS for this submission, but CNSC has been clear that a future submission must include a draft EIS with all revised text
 - CNSC is only anticipating 1 IR response for ERFN to review
- Next Steps: CNSC will conduct a 30-day completeness check, if the completeness check passes, a 90-day technical review will take place
- Licencing:
 - Denison is required to share the facility licence manual (broad overview) and facility description manual (slightly more detailed) with the communities
 - Denison has not yet reached out to ERFN regarding timelines for these documents –

CNSC received an email from Denison on June 1st stating that they have sent the draft versions of the Facility Licensing Manual and Facility Description manuals to ERFN for comment.

ERFN Project Update

- ERFN has identified concerns that the EIS overstates Bobby John's use of the land and wants to ensure that his uses are not representative of the full Nation – the concern is that Bobby John has since passed and that Denison may claim the Nation no longer uses the land in this manner
 - ERFN has requested that Denison adjusts the full EIS to be more cohesive and to ensure that there is one voice throughout the document representing ERFN

- An addendum should be added to indicate that Denison's representation of Bobby John is not for the full community
- Denison has indicated that EAs usually use a fictitious user of the land to personify the community and would make the requested updates to the draft EIS

Subject: VIRTUAL: ERFN Video Premiere
Location: Virtual

Start: Tue 2023-06-06 1:45 PM
End: Tue 2023-06-06 3:15 PM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Carolanne Inglis-McQuay

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Please accept this invite as an offer to virtually attend the ERFN Video Premiere, hosted by Denison Mines, at the Alt Hotel on June 6, 2023 – from 11:45 until 1:15.

Please accept this meeting request accordingly. Please note this session will be recorded. Please also feel free to send to those you may think would be interested in such a virtual event.

For Canada, the month of June is National Indigenous History Month – which is commemorated as such to recognize and honour the history, heritage and diversity of First Nations, Inuit and Métis Peoples in Canada, and all of their contributions - past and present.

Denison has been working with English River First Nation (“ERFN”) Member, Mr. Dale Apesis, of Dale Apesis Consulting, to prepare a short series of videos that enable ERFN to share the stories they wish to be shared with Denison and others. These videos are in the spirit of Call to Action 92 from the [Truth and Reconciliation Report](#), subsection iii which states: *Provide education for management and staff on the history of Aboriginal peoples, including the history and legacy of residential schools, the United Nations Declaration on the Rights of Indigenous Peoples, Treaties and Aboriginal rights, Indigenous law, and Aboriginal-Crown relations. This will require skills based training in intercultural competency, conflict resolution, human rights, and anti-racism.*



English River First Nation
nuwets'j honi
Nation Builders

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From: [Nickolet, Sydney](#)
To: [Cheyenna Hunt](#)
Cc: [Levine, Adam](#); [Froess, Ryan](#); [Yen, Wish](#); [Way, Jessica](#);
Subject: RE: ERFN WWH Report - for feedback
Attachments: E-DOCS-#6948395-v5-2022-12-10-TKLUS-
ERFN_What_We_ve_Heard_Report_on_IK_and_Socio_Economic_studies.DOCX
Sent: 2023-07-14 10:17:15 AM

Good morning Cheyenna,

I just wanted to follow up on my email from June 16th regarding the review of the What We Heard Report for the Wheeler River project and how it is coming along. If you would like to meet to discuss the report or if you would like to add it as an agenda item for our next meeting on July 25th, just let me know!

We are seeking feedback on the report by July 31st, 2023.

Hope you have a great weekend!
Thanks,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nicolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nicolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la patrie des Métis*

From: Nickolet, Sydney
Sent: June 16, 2023 2:12 PM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: Levine, Adam <adam.levine@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: ERFN WWH Report - for feedback

Good afternoon Cheyenna,

Over the recent months, CNSC staff have been implementing a new practice of developing “What We Heard” reports, in response to Indigenous Knowledge studies. The purpose of this document is to summarize what CNSC staff understood from ERFN’s 2022 Traditional Knowledge Study and Health and Economic Study, for discussion purposes. We welcome comments from ERFN on how we have captured this information and would be happy to meet and discuss further if needed. Once finalized, CNSC would work with ERFN to ensure that the information captured is accurate for sharing with CNSC subject matter experts to ensure a fulsome review of future iterations of the Wheeler River draft EIS.

We are seeking feedback on the report by July 31st, 2023. Please note that CNSC combined both the Traditional Knowledge Study and the Health and Economic Study into one report.

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nicolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nicolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la patrie des Métis*

From: [Boser, Sydney](#)
To: [Boser, Sydney](#)
Subject: RE: Request for review: 2023-07-25 ERFN-CNSC monthly project meeting minutes
Sent: 2025-07-22 9:55:19 AM

From: Yen, Wish <wish.yen@cnscccsn.gc.ca>
Sent: Tuesday, July 25, 2023 4:43 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Takala, Torin <torin.takala@cnscccsn.gc.ca>
Subject: Request for review: 2023-07-25 ERFN-CNSC monthly project meeting minutes

English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project
July 25, 2023 4-5:30PM EST
Attendees: Cheyenna Hunt, Sydney Nickolet, Jes Way and Wish Yen

Wheeler River Project

- Denison has submitted the responses to the IRs on July 14th and a technical review will kick off should Denison pass the completeness check
 - Denison reached out to ERFN and had a meeting to discuss ERFN's IR and their proposed response
 - ERFN has requested that Denison update each section with text indicating that Bobby John is a representative of past and current ERFN community land users. Denison has committed to make this addition and ERFN has no additional concerns on the IR
 - ERFN was happy with how Denison handled this, that they proactively reached out to ERFN to resolve the IR directly
 - Based on ERFN's feedback, the technical review of the IR may be more an administrative action for ERFN rather than a formal review
- There are no additional comments on the What we heard report
 - ERFN is happy that the information was well digested by CNSC and is well presented
- Outreach and engagement event anticipated for October
 - ERFN Election to take place the 3rd week of October and 30 days prior, Chief and Council can't work or make decisions (unless it's an emergent situation) and may not be available during this period
 - Nominations should be completed before 3rd week of September
 - All ERFN departments will continue to work as normal
 - CNSC wants to validate issues and concerns within the community in-person or virtually to ensure the information presented in the EIS is accurately portrayed, and hear perspectives of community members
 - ERFN proposes a meeting in a banquet room in Saskatoon with select land-users, community leaders, family heads, elders or former leaders – these are the people who will provide the most appropriate feedback and can disseminate the information with the community

- This would also be a good opportunity to present to the new Chief and Council
- Anticipated budget:
 - Approximately \$900-\$1000/person for 6 councillors + 6 participants (including honoraria); \$300-\$400/person for 6 Saskatoon participants (This covers honoraria only, as no travel costs)
 - \$1000 for a banquet hall booking; \$600-\$700 for lunch
 - Budget for this could be covered by [ISCF](#), the remaining PFP or ToR funding for long term engagement
- Community meetings with a presentation (held at band office) is not recommended as the key people aren't present, given that 50% of community is located outside of Patuanak. In Saskatoon, can get a better selection of land users, given that many who are away return to use the land up north throughout the year
- Public comment period responses by Denison
 - Denison is currently addressing the public comment tables and has responded to ERFN concerns
 - Once the impact benefit agreement between ERFN and Denison has been signed, an ERFN environmental group would be able to address the concerns
 - A working group will be formed to collaborate with Denison should any concerns not be able to be addressed

Long-term ToR

- ERFN is currently prioritizing the review of the Denison responses to the public comments but Cheyenna will touch base the lawyer handling the TOR and see where it is at.

Action Item

- Long-term ToR to be discussed at the August monthly meeting, along with next steps on potential travel

From: [Froess, Ryan](#)
To: [Cheyenna Hunt](#)
Cc: [Nickolet, Sydney](#); [Levine, Adam](#);
Subject: English River First Nation - tragic news
Sent: 2023-08-11 6:03:28 PM

Good afternoon Cheyenna,

We heard the very sad and devastating news release yesterday that English River First Nation had discovered the remains of unmarked graves at the former Beauval residential school in northern Saskatchewan. This is tragic news and we as CNSC staff wanted to pass on our deepest condolences and let you know our thoughts are with you and your family, community members, elders and your entire Nation in the coming days, weeks, and years as your Nation begins to start on a healing journey.

I know we have a few meetings/files and you will see a few emails from CNSC today on things we are working together on over the coming weeks with ERFN. If you would like postpone and/or reschedule any meetings/responses too later dates we totally understand and we can meet again when you feel is appropriate.

Please let us know if there is anything CNSC staff can do during this time.

Ryan

From: [Kwamena, Nana-Owusua](#)
To: [Cheyenna Hunt](#)
Cc: [Jamie Dickson](#); [Vice Chief Jenny Wolverine](#); [randy.mcintyre](#); [Way, Jessica](#); [Froess, Ryan](#); [Levine, Adam](#); [Cattrysse, Clare](#); [Burton, Patrick](#); [Jeff.Dereniowski@gov.sk.ca](#); [brianne.england@gov.sk.ca](#);
Subject: RE: English River First Nation letter of Consent re Denison Wheeler River Project
Attachments: [E-DOCS-#7144139-v1-2023-10-11_-_Response_to_ERFN_letter_of_consent_re__Denison_Wheeler_River_project_-_pdf_version.PDF](#)
Sent: 2023-10-11 5:43:00 PM

Thank you for your letter dated September 27, 2023. Our response to this correspondence is attached.

Please feel free to contact me if you have any other questions or would like to discuss further.

Regards,
Nana

Nana Kwamena
(she, her, elle)

Director, Environmental Review Division | Directrice, Division d'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
nana-owusua.kwamena@cnsccsn.gc.ca | Tel: 343-543-6760

From: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Sent: Tuesday, October 3, 2023 4:19 PM
To: Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnsccsn.gc.ca>; brianne.england@gov.sk.ca
Cc: [Jamie Dickson](mailto:jamie.dickson@oktla.com) <jamie.dickson@oktla.com>; Vice Chief Jenny Wolverine <jenny.wolverine@erfn.net>; [randy.mcintyre](mailto:randy.mcintyre@erfn.net)
Subject: English River First Nation letter of Consent re Denison Wheeler River Project

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Please see attached correspondence.

Cheyenna R. Hunt B.A., LL.B.
Director, Lands & Consultation

English River First Nation
Urban Office
321 - 2555 Grasswood Road
Saskatoon, Sk. S7T0K1

Cell: 306.291.6808
Email: cheyenna.hunt@desnedhe.com



English River
First Nation

Telephone: (306) 396-2055

English River First Nation
Band Office
P.O. Box 30
Patuanak, SK S0M2H0

Facsimile: (306) 396-2155

September 27, 2023

Nana Kwamena
Director, EA Division
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

Brianne England
Manager, Applications
Saskatchewan Ministry of Environment
4th Floor, 3211 Albert Street
Regina, SK, S4S 5W6

SENT VIA EMAIL TO:
Nana-Owusua.Kwamena@cnsccsn.gc.ca

SENT VIA EMAIL TO:
Brianne.England@gov.sk.ca

Dear Nana and Brianne,

Re: Consent for the Wheeler River Project (the "Project")

This letter is to confirm that English River First Nation has concluded an agreement with Denison Mines Corp. in respect of the Project ("Agreement"). The Agreement provides, among other matters, for various procedural and substantive commitments by Denison to ERFN, and the support and consent of English River First Nation 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.

English River First Nation confirms that, subject to Denison materially fulfilling its commitments under the Agreement to environmental protection, shared prosperity, and ongoing accommodation of ERFN's rights and way of life, ERFN consents to and supports the Project and intends to continue to participate in the ongoing regulatory approval processes for the Project in a manner consistent with our obligations in the Agreement.

Yours truly,

Jenny Wolverine, Acting Chief

Randy McIntyre, Councillor

cc: Cheyenna Hunt, Director, Lands & Consultation, ERFN, Cheyenna.Hunt@desnedhe.com
Jessica Way, EA Officer, CNSC, Jessica.Way@cnsccsn.gc.ca
Jeff Dereniwski, Senior EA Administrator, MOE, Jeff.Dereniwski@gov.sk.ca



October 11, 2023

Acting Chief Jenny Wolverine and Councillor Randy McIntyre
English River First Nation
Band Office
P.O. Box 30
Patuanak, SK S0M2H0

Subject: Response to ERFN's Letter of Consent for the Proposed Wheeler River Project

Dear Acting Chief Jenny Wolverine and Councillor Randy McIntyre:

Thank you for your letter dated September 27, 2023 [1]. We understand that the signing of this agreement with Denison Mines Corp (Denison) is a significant milestone for English River First Nation (ERFN). We also acknowledge the accompanying commitments that Denison has made to ERFN and what this means in terms of advancing reconciliation and partnership with ERFN.

As CNSC staff, we remain committed to working and collaborating with ERFN over the remaining steps of the ongoing environmental assessment for Denison's proposed Wheeler River project. I trust that our upcoming meeting at the end of October will allow us to discuss ERFN's technical review of Denison's August responses to Information Requests on the draft Environmental Impact Statement, outstanding concerns by ERFN on the proposed project and further build on our existing relationship.

We are committed to continuing to work collaboratively with ERFN throughout the remainder of this process, in accordance with the CNSC-ERFN project specific Terms of Reference for the Wheeler River Project [2] and commitments made in the CNSC-ERFN monthly meetings, as well as collaborating on ongoing oversight and monitoring after any project or licensing decisions are made. Whether the project is approved or not, CNSC staff are committed to ongoing, respectful, and open communication and collaboration with ERFN, as demonstrated by the long-term relationship Terms of Reference currently being finalized between ERFN and CNSC [3].

Please feel free to contact me if you have any other questions or comments regarding ERFN's participation in the environmental assessment process for this project, or the consultation that has occurred to date.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N. Kwamena'.

Nana Kwamena
Director, Environmental Review Division

Cc:

ERFN: C. Hunt

CNSC: J. Way, R. Froess, A. Levine, C. Cattysse, P. Burton

Saskatchewan Ministry of Environment: B. England, J. Dereniowski

References:

- [1] Letter, Acting Chief Jenny Wolverine and Councillor Randy McIntyre (English River First Nation) to N. Kwamena (CNSC) and Brianne England (Saskatchewan Ministry of Environment), Consent for the Wheeler River Project (the “Project”), September 27, 2023 (e-doc 7141151)
- [2] Terms for Consultation and Assessment Activities between Canadian Nuclear Safety Commission (CNSC) and English River First Nation in respect of the Denison’s Wheeler River Project, December 2021 (e-doc 6700787)
- [3] Draft Terms of Reference for English River First Nation – Canadian Nuclear Safety Commission Long-Term Engagement (e-doc 7103668)

From: [Yen, Wish](#)
To: [Froess, Ryan](#); [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#); [Way, Jessica](#); [Akhter, Salman](#);
Cc: [Levine, Adam](#); Cheyenna Campbell; [Gorzkowski, Konrad](#); [Nickolet, Sydney](#);
Subject: 2023-11-28-CNSC and ERFN Wheeler River Project meeting minutes
Sent: 2023-11-30 10:37:10 AM

Good morning Cheyenna,

Please find the minutes from our Wheeler River Project meeting below.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer | Agente en examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

wish.yen@cnsccsn.gc.ca | 343.553.2233



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English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

November 28, 2023 2-3 PM CST

Attendees: Cheyenna Hunt, Ryan Froess, Konrad Gorzkowski, Jes Way and Wish Yen

CNSC and ERFN Outreach and Engagement

- ERFN has applied for funding to host a sweat lodge event with CNSC. This event is to provide CNSC perspective on ERFN's culture, ceremonies and views on traditional knowledge and how to sustain these

ERFN Update

- ERFN had a ratification vote for the Wheeler River project and the community provided full support with a 70% positive vote for the project
 - ERFN had a campaign to get information related to the project out to members, including open houses at Saskatoon, Patchuanak and La Plonge
 - ERFN visited the Wheeler River site to pray and offer blessings to the land. Members discussed that historically, ERFN used to walk from La Plonge up to Wheeler River area over a two week period
- Technical Review: ERFN confirms that the IR from the technical review has been approved – the changes made in the EIS by Denison have been accepted by ERFN
- Public Comments Review: SVS's perspective felt like a template that is against industry which doesn't reflect ERFN. ERFN is now working with Robin Kusch to work with community members to capture issues and concerns that better capture the ERFN community's feedback in a more industry positive light
 - Public comments have been summarized into three categories for Denison to address
 - ERFN has 15 areas of concern; Denison has responded to the majority of them with 3 outstanding which still need to be worked on by Denison
- Licensing Review: ERFN has reviewed training workbooks and plans shared by Denison

CNSC EA Update

- The FIRT technical review is currently being wrapped up, a draft response has been shared back with Denison and a final version aimed to be shared by the end of the week
- Once the technical review has concluded, all the responses will be posted onto the IAAC registry and notifications will be shared out through the distribution list

CNSC Licencing Update

- Denison has provided a majority of program documents for CNSC's review, but a few are still outstanding, including the Engagement Program

Cameco Hearing Decisions (Key, MacArthur, Rabbit Lake)

- ERFN was really upset with the commissions decision but has no way to appeal the decision by the CNSC Commission to grant Cameco a 20 year licence. ERFN is very frustrated and wants to request a federal judicial appeal, but does not have the funds to action this.
- ERFN is concerned that President Velshi cemented the previous mentality towards decisions without consideration of UNDRIP, with a perspective that focuses safety over Indigenous Rights. Consultation should be on-going and the 20-year licence won't provide the ERFN an opportunity to action their traditional laws under UNDRIP.
 - Cameco has been in ERFN's territory without consent for decades and this will continue with these licences that have been granted by the Commission
- Cheyenna believes the presentation by Chief Tammy Cook-Searson is a conflict of interest and shouldn't have been considered as this person was voted onto Cameco's board a week after the hearing
- CNSC staff want to request ERFN's feedback on how we can help to present ERFN's concerns to the Commission better and staff are committed to continue to work with the Nation to work on this

UMMD ROR

- December 14th 1PM EST Hybrid Meeting – Interventions can be made virtually
- CNSC confirms receiving ERFN's written interventions

Action Items

- Ryan will set up a kick-off meeting for Angie with CNSC before the Christmas Holidays **(complete)**
- Will review and discuss funding for the sweat lodge proposal before Christmas Holidays **(ongoing)**
- Ryan will follow-up on the Terms of Reference for ERFN with CNSC **(complete)**
- Ryan to update January Meeting agenda to discuss EA report and RIA report drafting for Wheeler River **(complete)**

From: [Nickleto, Sydney](#)
To: [Cheyenna Hunt](#); angie.campbell@desnedhe.com;
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Yen, Wish](#);
Subject: ERFN & CNSC Monthly Meeting Summary - January 23rd
Attachments: [ERFN_Rights_Impact_Assessment_Framework_Presentation.pdf](#)
Sent: 2024-01-26 4:27:08 PM

Hello Cheyenna and Angie,

Please see below the notes from our monthly meeting on Tuesday. I have attached the presentation that Ryan gave and he is currently working on the Table of Contents document for the RIA and will send over next week. Hope you both have a great weekend 😊

ERFN & CNSC Monthly Meeting – January 23rd 2pm-3:30pm CST

Participants: Ryan Froess, Sydney Nickolet, Wish Yen, Cheyenna Hunt and Angie Campbell

Denison Update:

- CNSC completed our technical review of Denison's last IR submission from August
 - It has been published on the [IAAC Registry](#) in mid-December
- Denison is planning to resubmit near the end of January but CNSC is unsure if Denison is still planning to follow through with that timeline
 - Denison is planning to submit a revised EIS as well with this submission instead of revised IR responses
 - Depending on the information provided, this review may take CNSC 90 days to review but timelines may shift
 - ERFN is requested to review the next EIS submission to ensure that ERFN's information is incorporated correctly- this would include ensuring that Bobby John's information and concern regarding his land use isn't the sole representation of ERFN in the EIS as well as including the validation process of issues and concerns with ERFN. The validation process means that Denison should be working with ERFN on the issues and concerns that have been raised by community members on the project and verifying how those concerns will be addressed or not addressed.
- CNSC advises Denison to take their time on the submission and ensure that the information provided is fulsome
- ERFN is internally working with their consultants on the validation process to ensure that Denison has incorporated all the concerns or that they are addressed within the IBA. ERFN will also be working with Carolanne on this process
 - Within the IBA with ERFN, Denison and ERFN have set an agreement within the IBA that if there are disagreements that they will allow the regulator to decide but that there is a minimum standard that the parties have to live up to
- CNSC will need to write our internal EA report that will be included in the Commission member document (CMD) once we have reached a final EIS for the Denison project prior to the Commission hearing
- Cheyenna asked about overlapping territories and how the CNSC treats other Nations that are claiming to be impacted on the project and how this information comes across to the Commission
 - Ryan responded that currently the CNSC is working internally on how to properly articulate this information to the Commission prior to these hearings- more to come on that process

Rights Impact Assessment (RIA):

- Ryan presented on the rights impact assessment- CNSC will include the presentation with the notes
- CNSC needs to understand how the Nation will be impacted by the project
- CNSC has developed a framework for RIA's
 - The framework includes 8 steps on the steps that the CNSC considers when doing RIA's
- A lot of the work that ERFN has done on the studies will be included in the RIA. There shouldn't be much additional information outside of the studies and information that has already been shared with CNSC
- Ryan shared the draft table of contents document in the meeting to show the draft chapters that are being proposed
- ERFN is open to both options where CNSC writes the RIA and ERFN reviews and provides comments or the other option where ERFN would write the document.
- ERFN has a longer study with more information that wasn't shared with CNSC and ERFN will provide those details into the RIA when reviewing
- The first 3 chapters of the RIA can be written and worked on now but chapters 4-6 will need to be drafted once the final EIS comes in for Denison
- We can either continue to discuss the RIA during the last 30 minutes of our monthly meetings or we can set up separate meetings- whatever works better

TOR, Workplan and Funding:

- CNSC and ERFN will work together on a media signing once the TOR is finalized
- Need to attach a budget to the workplan
 - The goal would be to have 4 meetings a year and 1 of those meetings would be around the UMM ROR engagement session that CNSC typically holds in the fall
 - Our first meeting will likely be in April around the time of the ceremony and sweat
- April 12th and 13th should work well for the ceremony. One day would be used for our TOR meeting and the second day would be a full ceremony and feast

ACTIONS:

- CNSC will attach the RIA presentation and the draft table of contents document to the notes for ERFN's reference
- CNSC will send over the link for the hiring of CNSC Indigenous summer students
- ERFN can put together a budget for the TOR workplan that will be reviewed by CNSC federal review committee
- ERFN needs to apply for Stream 3 funding prior to the conference in Calgary in order to get funding for travel for the conference
 - ERFN can include Angie's travel costs as well if she is planning to attend
- CNSC will begin writing some of the RIA chapters and will share with ERFN

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la patrie des Métis*



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

CNSC's Indigenous and/or Treaty Rights Impact Assessment Framework



Background

- Rights impact assessments have become common place for major resource projects and major regulatory processes in Canada
- Main drivers include:
 - Government of Canada priorities, policies and directives (e.g. rights recognition and implementation framework, Principles Respecting the Government of Canada's Relationship with Indigenous Peoples, reconciliation, TRC Calls to Action)
 - Legislative (e.g. IAAC, CERA, UNDRIP)
 - Precedents (e.g. Frontier Oil Sands Mine, Roberts Bank Terminal (CEAA 2012))

Objectives

- The objectives of developing a framework and policy related to the assessment of the potential impacts to Indigenous and/or Treaty rights are to ensure:
 - that projects undergoing an Environmental Assessment and/or licensing processes led by the CNSC that trigger the duty to consult and accommodate take into account all the potential impacts on Indigenous and/or Treaty rights
 - the Commission receives clear and complete information and analysis regarding potential impacts on rights with regards to their decisions
 - the CNSC's approach to consultation is aligned with current and evolving requirements and expectations of the courts, legislation, and best practices and approaches across the federal government

Criteria for RIA

- Conducting a RIA is appropriate when certain criteria are met:
 - The project/Commission's Decision raises the Duty to Consult
 - Identified Indigenous Nations and communities are actively engaged, have identified/demonstrated the exercise of Indigenous and/or treaty rights in the vicinity of the project and have identified specific concerns with regards to potential impacts from the proposed project on their rights and interests
- There is a range of options for the implementation of a RIA including the CNSC developing it with little to no input from an Indigenous group to a fully collaborative approach where the CNSC and the Indigenous Nation and community share the drafting and analysis in a separate RIA Report. The recommended approach is based on a number of criteria including:
 - Level of engagement of the Indigenous Nations and communities
 - Level of concerns raised by the Indigenous Nations and communities
 - Severity of potential impacts
 - Level of traditional activities identified by the Indigenous Nations and communities in the vicinity of the project
 - Project timelines
 - Resources of CNSC staff and the Nations and communities

CNSC's Framework for Rights Impact Assessment (RIA)

- CNSC is currently the Responsible Authority for 6 ongoing EAs under CEAA 2012 where the Duty to Consult has been triggered and a number of Indigenous groups have asserted through consultation processes that their rights and interests may be impacted
- CNSC staff have conducted benchmarking against existing RIA frameworks and guidance (e.g. IAA Interim Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples)
- CNSC staff have worked from these examples to create a RIA framework that can be applied to CNSC regulatory processes and tailored to each particular project and Indigenous group being consulted

CNSC's Framework for RIA

Step 1: Identification of potentially impacted rights and interests

Step 2: Identification of current baseline conditions including cumulative effects, current territorial capacity and historical context

Step 3: Identification of potential project interactions/pathways with identified rights and interests (i.e. potential changes to current baseline conditions related to the project)

Step 4: Identification of severity of potential project interactions with identified rights and interests

Step 5: Identification of potential mitigation and/or accommodation measures to address identified potential project interactions with identified rights and interests

Step 6: Identification of any residual impacts after consideration of proposed mitigation and/or accommodation measures

Step 7: Consideration of any additional mitigation and/or accommodation measures, should residual impacts be identified, and conclusions on seriousness of any remaining impacts or concerns

Step 8: Documenting and submitting process steps and outcomes to decision-makers (the Commission)

- Collaborative drafting of rights impact analysis report to be appended to CNSC staff's EA report or CMDs
- Collaborative drafting of relevant sections of the Indigenous consultation section of CNSC staff's EA report or CMDs
- Written submissions from the Indigenous group to the Commission and oral intervention at Commission hearings

Role of Project Proponents

- The RIA process is to be conducted primarily between the Crown (CNSC) and potentially impacted Indigenous Nations and communities , however, project proponents have an important role to play throughout the EA or licensing process, where appropriate:
 - Providing data and information on the project and potential project impacts (including historical context and future plans)
 - Providing information regarding proposed mitigation measures to address potential environmental effects and/or impacts on rights as well as other commitments or measures to address concerns raised by Indigenous groups
 - Providing support and capacity for additional studies and information gathering that feeds into the RIA process, where appropriate (e.g. Indigenous Knowledge and Land Use, alternative means, and psycho-social studies)
 - Participating in discussions around potential additional measures and commitments (e.g. accommodations) to address any identified remaining impacts on rights

Questions?

From: [Wheeler River Project - Projet de Wheeler River](#)
[Wheeler River Project - Projet de Wheeler River](#); Yen, Wish; marcus.edino@ec.gc.ca; cari-lyn.egg@ec.gc.ca;
[julie.c.anderson@hc-sc.gc.ca](#); Dutchak, Cassidy (HC/SC); Hancock, Terina; Clarke, Christina; Kim,Duck (ECCC); Lam, Jeffrey;
To: [Sauvé, Daniel](#); Zheng, Qinghui; Hamlat, Said; Froess, Ryan; Boser, Sydney; Mistry, Rajesh; Barker, Jackie (TC/TC); [Cheyenna Hunt](#); [DeActis, Natasha](#); [Mogge, Brandi](#); James, Clayton;
[ja-ei@hc-sc.gc.ca](#); paul.partridge@hc-sc.gc.ca; Kwamena, Nana-Owusua; Dereniowski, Jeff ENV; Purvis, Caroline; Fabian
[Mendoza, Melissa](#); Levine, Adam; Ramsey, Renee; Burton, Patrick; Way, Jessica; Takala, Torin; Dodkin, Christina; Lane, Rachel;
Cc: [England, Brianne ENV](#); [Dagher, Elias](#); Konopski, Heather (elle | she, her) (ECCC); [Brown, Gillian \(ECCC\)](#); [Gorzowski, Konrad](#);
[Sampat, Upasana](#); Longo, Samantha (ECCC); [Scott, Ken ENV](#); [Way, Jessica](#); Yen, Wish;
Subject: RE: Wheeler River EA Project - January 2024 Update
Attachments: E-DOCS-#5908054-v4-EA_-_Guidance_for_Federal_and_Provincial_Reviewers_on_EIS_Review_Process_-_CEAA_2012_DOCX;E-DOCS-#5906585-v1-EA_-_Advice_to_the_proponent_re_EIS_-_template.DOCX;#7220817-2024-02-12-Submission_#4-Denison_Wheeler_River_EA.ZZZ.DRF;E-DOCS-#7226750-v1-2024-02-10-Wheeler_River_EA-EIS_Submission_#4-IR_Review_Table_-_Outstanding_IRs.DOCX;
Sent: 2024-02-22 11:18:00 AM

Hi Everyone,
We have finished our completeness check of Denison's submission from last week, and have determined that we have everything we need to move to the next phase of review. Please share the below information and attached information with anyone from your teams that will participate in the next phase of review.

There are currently 96 unresolved IRs (CNSC: 36*, ECCC: 47*, HC: 11, NRCan: 2). *Note, some of the totals are IRs shared between ECCC and CNSC, which is why they don't total to 96.

Technical review details:

Your assistance is requested to review Responses to IRs for which you/your organization was an author or co-author, within the mandate and scope of your organization.

With this submission, Denison have provided the following:

- Denison's responses to FIRT IRs – tables provided in Word (e-doc: 7220826) and table plus attachments provided in PDF (note the PDF version contains both round 2 and round 1 responses) (e-doc: 7220824)
- Responses to Advice to proponent response table (e-doc: 7220828)
- Fully revised draft Environmental Impact Statement, with a Word version including all tracked changes and a PDF version in chapters (Folder e-doc: 7220833)
- Fully revised Indigenous Engagement Report (e-doc: 7225757)
- Commitments Register – updated to include commitments made during the EIS review period (e-doc: 7225758)
- Concordance table – summary of changes from the October 2022 Draft EIS to the January 2024 revised Draft EIS (e-doc: 7225759)

The e-doc references and attachments are for CNSC staff, along with the attache folder (e-doc: 7220817) which contains all of the documentation. For the other federal departments, here is where this information can be accessed:

- File Link: <https://denisonmines.egpyte.com/fl/27VG5YKWPY/TRANSFER>
- Password: be2AvBVRjAMa

Timeline:

The review period for the technical review by SMEs will last 5 weeks. Therefore, you are requested to provide the result of your technical review by

Thursday March 28th, 2024, including management approval if required.

Note, an important change for this review period: Where there are outstanding concerns that cannot be resolved and it is clear that there discrepancy between the information Denison is providing and what is expected based on EA requirements, we are planning to schedule technical meetings in mid-April to discuss with Denison as required. We recognize there are areas where Denison believes they have meet the requirements, and yet from SME perspective, information is outstanding. We think that direct discussions may increase the efficiency in communicating these epectations. With this in mind, the table below reflects these discussions and there may be a need for additional director approvals, which has also been factored in. Please see also the second important date, **Friday May 10th, 2024**.

	Timeline	Start	End
Submission Date	Milestone	Feb 10	-
Completeness check	2 weeks	Feb 12	Feb 21
Technical review by FIRT			
FIRT Conducts EIS Technical Review (All participants)	5 weeks	Feb 22	Mar 28
FPIRT Review completed and any additional IRs due to CNSC Lead	Milestone	-	Mar 28
CNSC Lead compiles review of FPIRT, verifies information, asks questions, etc.	2 weeks	Apr 2	Apr 12
IR Discussions with SMEs	1.5 weeks	Apr 15	Apr 23
Revisions following IR discussions	1.5 weeks	Apr 24	May 3
Director approvals	1 week	May 6	May 10
Director approved IRs due to Jes and Wish	Milestone	•	May 10
CNSC Internal Approvals of IRs, letter and assessment / DIR Review	1 week	May 10	May 17
Revisions following DIR review	2 days	May 15	May 17
Admin Formatting	1 day	May 17	May 20
Round #3 Completion date		-	May 20

Documenting Review Findings:

A table of all outstanding IRs in the review format requested is attached (e-docs: 7226750). Please save an alternative version for your Department or division, for submission at the end of the review period. Also attached is a template for *Advice to the Proponent* comments (e-doc: 5906585). This can be used for any additional comments, for cases where the comment does not qualify as an IR and may be considered as advice.

I am not planning to organize an official kick off, but will be reaching out to lead coordinators to discuss in further detail, as necessary.

As always, we are available to answer any questions. We can also arrange for meetings with Denison, CNSC and/or between members of the FPIRT as you feel the need to support your technical review. If you have any questions regarding the review or anything else, please contact either myself or Wish Yen at Wish.Yen@cnscccsn.gc.ca.

Thanks,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Officer | Agente en examen de l'environnement

Environmental Review Division | Division de l'examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

My work hours might not be the same as your work hours – please reply at your convenience.

From: Wheeler River Project - Projet de Wheeler River

Sent: Thursday, February 15, 2024 1:13 PM

To: Wheeler River Project - Projet de Wheeler River ; Yen, Wish ; marcus.edino@ec.gc.ca; cari-lyn.epp@ec.gc.ca; julie.c.anderson@hc-sc.gc.ca; Cassidy.Dutchak@hc-sc.gc.ca; Hancock, Terina ; Terina.Hancock@dfo-mpo.gc.ca; Clarke, Christina ; christina.clarke@NRCan-RNCan.gc.ca; Kim,Duck (ECCC) ; duck.kim@ec.gc.ca; Lam, Jeffrey ; Sauvé, Daniel ; Zheng, Qinghuai ; Hamlat, Said ; Froess, Ryan ; Nickolet, Sydney ; Mistry, Rajesh ; Barker, Jackie (TC/TC) ; Schiocchet, Claudia (HC/SC) (she, her, hers elle, la, lui) ; Cheyenna Hunt ; DeActis, Natasha ; Mogge, Brandi ; James, Clayton

Cc: ia-ei@hc-sc.gc.ca; paul.partridge@hc-sc.gc.ca; Kwamena, Nana-Owusua ; Dereniwski, Jeff ENV ; Purvis, Caroline ; Fabian Mendoza, Melissa ; Levine, Adam ; Ramsey, Renee ; Burton, Patrick ; Way, Jessica ; Takala, Torin ; Dodkin, Christina ; Lane, Rachel ; England, Brianne ENV ; Dagher, Elias ; Konopski, Heather (elle, la she, her) (ECCC) ; Brown, Gillian (ECCC) ; Gorzkowski, Konrad ; Sampat, Upasana ; Longo, Samantha (ECCC) ; Scott, Ken ENV

Subject: RE: Wheeler River EA Project - January 2024 Update

Hi All,

I should have flagged this sooner but we did receive Denison's resubmission over the weekend. Our completeness check is underway and I have more information to come for timelines and the review, but I am anticipating sending this information part way next week.

Please feel free to let us know if you have any questions or concerns.

Thanks,

Jes

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>

Sent: Tuesday, January 30, 2024 8:31 PM

To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; marcus.edino@ec.gc.ca; cari-lyn.epp@ec.gc.ca; julie.c.anderson@hc-sc.gc.ca; Cassidy.Dutchak@hc-sc.gc.ca; Hancock, Terina <Terina.Hancock@dfo-mpo.gc.ca>; Clarke, Christina <christina.clarke@NRCan-RNCan.gc.ca>; Kim,Duck (ECCC) <duck.kim@ec.gc.ca>; Lam, Jeffrey <jeffrey.lam@cnscccsn.gc.ca>; Sauvé, Daniel <daniel.sauve@cnscccsn.gc.ca>; Zheng, Qinghuai <qinghuai.zheng@cnscccsn.gc.ca>; Hamlat, Said <Said.Hamlat@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Mistry, Rajesh <rajesh.mistry@cnscccsn.gc.ca>; Barker, Jackie (TC/TC) <Jackie.Barker@tc.gc.ca>; Schiocchet, Claudia (HC/SC) (she, her, hers elle, la, lui) <Claudia.Schiocchet@hc-sc.gc.ca>; Cheyenna Hunt <cheyenna.hunt@desnedhe.com>; DeActis, Natasha <natasha.deactis@cnscccsn.gc.ca>; Mogge, Brandi <Brandi.Mogge@dfo-mpo.gc.ca>; James, Clayton <Clayton.James@dfo-mpo.gc.ca>

Cc: ia-ei@hc-sc.gc.ca; paul.partridge@hc-sc.gc.ca; Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnscccsn.gc.ca>; Dereniwski, Jeff ENV <Jeff.Dereniwski@gov.sk.ca>; Purvis, Caroline <Caroline.Purvis@cnscccsn.gc.ca>; Fabian Mendoza, Melissa <Melissa.FabianMendoza@CNSC-CCSN.GC.CA>; Levine, Adam <Adam.Levine@cnscccsn.gc.ca>; Ramsey, Renee <renee.ramsey@cnscccsn.gc.ca>; Burton, Patrick <Patrick.Burton@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Takala, Torin <torin.takala@cnscccsn.gc.ca>; Dodkin, Christina <Christina.Dodkin@cnscccsn.gc.ca>; Lane, Rachel <Rachel.Lane@cnscccsn.gc.ca>; England, Brianne ENV <brianne.england@gov.sk.ca>; Dagher, Elias <Elias.Dagher@cnscccsn.gc.ca>; Konopski, Heather (elle, la she, her) (ECCC) <Heather.Konopski@ec.gc.ca>; Brown, Gillian (ECCC) <Gillian.Brown@ec.gc.ca>; Gorzkowski, Konrad <konrad.gorzowski@cnscccsn.gc.ca>; Sampat, Upasana <upasana.sampat@cnscccsn.gc.ca>; Longo, Samantha (ECCC) <Samantha.Longo@ec.gc.ca>; Scott, Ken ENV <Ken.Scott@gov.sk.ca>

Subject: RE: Wheeler River EA Project - January 2024 Update

Hi Everyone,

I wanted to update that Denison is planning to resubmit on or around February 9th. More information to come on review timelines and information, once the review starts. If you have any questions or concerns, please don't hesitate to reach out.

Thanks,

Jes

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>

Sent: Thursday, January 18, 2024 7:25 PM

To: Yen, Wish <wish.yen@cnscccsn.gc.ca>; Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>; marcus.edino@ec.gc.ca; cari-lyn.epp@ec.gc.ca; julie.c.anderson@hc-sc.gc.ca; Cassidy.Dutchak@hc-sc.gc.ca; Hancock, Terina <Terina.Hancock@dfo-mpo.gc.ca>; Clarke, Christina <christina.clarke@NRCan-RNCan.gc.ca>; Kim,Duck (ECCC) <duck.kim@ec.gc.ca>; Lam, Jeffrey <jeffrey.lam@cnscccsn.gc.ca>; Sauvé, Daniel <daniel.sauve@cnscccsn.gc.ca>; Zheng, Qinghuai <qinghuai.zheng@cnscccsn.gc.ca>; Hamlat, Said <Said.Hamlat@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Mistry, Rajesh <rajesh.mistry@cnscccsn.gc.ca>; Barker, Jackie (TC/TC) <Jackie.Barker@tc.gc.ca>; Schiocchet, Claudia (HC/SC) (she, her, hers elle, la, lui) <Claudia.Schiocchet@hc-sc.gc.ca>; Cheyenna Hunt <cheyenna.hunt@desnedhe.com>; DeActis, Natasha <natasha.deactis@cnscccsn.gc.ca>

Cc: ia-ei@hc-sc.gc.ca; paul.partridge@hc-sc.gc.ca; Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnscccsn.gc.ca>; Dereniwski, Jeff ENV <Jeff.Dereniwski@gov.sk.ca>; Purvis, Caroline <Caroline.Purvis@cnscccsn.gc.ca>; Fabian Mendoza, Melissa <Melissa.FabianMendoza@CNSC-CCSN.GC.CA>; Levine, Adam <Adam.Levine@cnscccsn.gc.ca>; Ramsey, Renee <renee.ramsey@cnscccsn.gc.ca>; Burton, Patrick <Patrick.Burton@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Takala, Torin <torin.takala@cnscccsn.gc.ca>; Dodkin, Christina <Christina.Dodkin@cnscccsn.gc.ca>; Lane, Rachel <Rachel.Lane@cnscccsn.gc.ca>; England, Brianne ENV <brianne.england@gov.sk.ca>; Dagher, Elias <Elias.Dagher@cnscccsn.gc.ca>; Konopski, Heather (elle, la she, her) (ECCC) <Heather.Konopski@ec.gc.ca>; Brown, Gillian (ECCC) <Gillian.Brown@ec.gc.ca>; Gorzkowski, Konrad <konrad.gorzowski@cnscccsn.gc.ca>; Sampat, Upasana <upasana.sampat@cnscccsn.gc.ca>;

Longo, Samantha (ECCC) <Samantha.Longo@ec.gc.ca>; Scott, Ken ENV <Ken.Scott@gov.sk.ca>

Subject: Wheeler River EA Project - January 2024 Update

Hi All,

Happy New Year to those of you who I have yet to connect with!

I am reaching out to provide an update that it sounds like Denison may resubmit their responses to our last round of responses to IRs before the end of January. Apologies for the last minute update on this, but it has been a little bit unclear what their plans are. Flagging as a just in case. Given that the number of outstanding IRs has been reduced, we will likely also propose a shorter review time frame for your review. For those of you who are leading on the these reviews for your respective departments, I welcome feedback on this. I realize there is a lot going on at the moment, but also want to be fair to Denison when we are down to less than half of the number of the original IRs.

Thanks to those of you who are already looking at some of the outstanding IRs through a separate review process.

Please don't hesitate to reach out with any questions or concerns you may have.

Thanks

Jes

From: Yen, Wish <wish.yen@cnscccsn.gc.ca>

Sent: Wednesday, December 13, 2023 11:47 AM

To: Wheeler River Project - Projet de Wheeler River <Wheelerriver@cnscccsn.gc.ca>; marcus.edino@ec.gc.ca; angus.calderhead@ec.gc.ca; cari-lyn.epp@ec.gc.ca; julie.c.anderson@hc-sc.gc.ca; Cassidy.Dutchak@hc-sc.gc.ca; Hancock, Terina <Terina.Hancock@dfo-mpo.gc.ca>; Clarke, Christina <christina.clarke@NRCan-RNCan.gc.ca>; Kim, Duck (ECCC) <duck.kim@ec.gc.ca>; Lam, Jeffrey <jeffrey.lam@cnscccsn.gc.ca>; Sauvé, Daniel <daniel.sauve@cnscccsn.gc.ca>; Zheng, Qinghui <qinghui.zheng@cnscccsn.gc.ca>; Hamlat, Said <Said.Hamlat@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Mistry, Rajesh <rajesh.mistry@cnscccsn.gc.ca>; Barker, Jackie (TC/TC) <Jackie.Barker@tc.gc.ca>; Schiocchet, Claudia (HC/SC) (she, her, hers elle, la, lui) <Claudia.Schiocchet@hc-sc.gc.ca>; Cheyenna Hunt <cheyenna.hunt@desnedhe.com>; DeActis, Natasha <natasha.deactis@cnscccsn.gc.ca>

Cc: ia-ei@hc-sc.gc.ca; Yen, Wish <wish.yen@cnscccsn.gc.ca>; paul.partridge@hc-sc.gc.ca; Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnscccsn.gc.ca>; Dereniowski, Jeff ENV <Jeff.Dereniowski@gov.sk.ca>; Purvis, Caroline <Caroline.Purvis@cnscccsn.gc.ca>; Fabian Mendoza, Melissa <Melissa.FabianMendoza@CNSC-CCSN.GC.CA>; Levine, Adam <Adam.Levine@cnscccsn.gc.ca>; Ramsey, Renee <renee.ramsey@cnscccsn.gc.ca>; Burton, Patrick <Patrick.Burton@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Takala, Torin <torin.takala@cnscccsn.gc.ca>; Dodkin, Christina <Christina.Dodkin@cnscccsn.gc.ca>; Lane, Rachel <Rachel.Lane@cnscccsn.gc.ca>; England, Brianne ENV <brianne.england@gov.sk.ca>; Dagher, Elias <Elias.Dagher@cnscccsn.gc.ca>; Konopski, Heather (elle, la she, her) (ECCC) <Heather.Konopski@ec.gc.ca>; Brown, Gillian (ECCC) <Gillian.Brown@ec.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Sampat, Upasana <upasana.sampat@cnscccsn.gc.ca>; Longo, Samantha (ECCC) <Samantha.Longo@ec.gc.ca>; Scott, Ken ENV <Ken.Scott@gov.sk.ca>

Subject: Wheeler River EA Project-Completion of the technical review of Denison's response to IRs submission

Good morning everyone,

On December 5, 2023, the Federal, Indigenous Review Team (FIRT) completed the technical review of Denison's responses to information requirements (IRs). The technical review of the 238 IRs has resulted in 144 accepted IRs and 18 follow-up IRs. Please find the letter from CNSC staff to Denison with the outcome of the technical review attached and links for the [updated IR table](#) and [Advice to Proponent](#) table.

We would like to thank you and your teams for the expertise, time and support provided throughout the technical review and will be reaching out soon with requests for technical meetings with Denison as necessary.

If you have any questions regarding the technical review, please contact either myself or Jes Way at jessica.way@cnscccsn.gc.ca.

Thanks,

Wish on behalf of Jes Way

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnscccsn.gc.ca | 343.553.2233



From: [Nickolet, Sydney](#)
To: [Angie Campbell](#); [Cheyenna Hunt](#);
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Yen, Wish](#);
Subject: ERFN & CNSC Monthly Meeting Notes - March 6th
Sent: 2024-03-11 2:01:00 PM

Hello Angie,

Thank you for meeting with us last week for our monthly meeting – sorry we missed you Cheyenna but looking forward to our next chat 😊 See below the notes from the meeting. Please let me know if you have any comments on the notes! Thanks

CNSC & ERFN Monthly Meeting – March 6th 11am-12pm

Participants: Angie Campbell, Sydney Nickolet, Ryan Froess, Jessica Way, Dana Pandolfi and Torin Takala

CNSC Denison Update:

- CNSC received the updated EIS and responses to IR's in February and supplementary information from Denison and CNSC is currently reviewing those responses which would be a 90-day review
- CNSC sent emails to the federal Indigenous review team and the subscribers list to let everyone know that it was received
- There may be a few technical discussions with Denison on resolving a few IR's - these meetings will probably take place in April to discuss any outstanding topics
- CNSC is planning to start rights impact assessment work with ERFN and sharing documents with ERFN when ready

Cumulative Effects Conference and Ceremony:

- Cheyenna, Adam and Denison will be presenting together at the conference in Calgary April 9-10
- Adam may talk about UNDRIP and CNSC's role in the process and relationship building
- Planning for April 12th for the sweat ceremony and feast
- Could possibly have our meeting on the afternoon of April 11th - should work for CNSC
 - Part of the meeting could be to discuss the Denison project since Jess will be there in-person

Terms of Reference (TOR):

- Ryan mentioned that we can do the signing for the TOR on April 11th and then we will need to get the financial portion sorted out for it through ISCF and workplan will need to be submitted to FRC for approval.
- ERFN will need to confirm who will be involved in the TOR working group whether they have a youth, Elder and community members involved - usually about 4-6 people involved.

ACTIONS:

- CNSC to include Angie on the mailing list for Denison updates
- CNSC will add Angie to the regular occurring monthly meeting invite (complete)

-CNSC will work with ERFN to get the financial piece sorted out for the TOR in next month but will need to build out workplan ASAP with ERFN.

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties
intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory
and Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité
6 et la patrie des Métis*

From: [Boser, Sydney](#)
To: [Boser, Sydney](#)
Subject: RE: 2024-03-26 ERFN-CNSC monthly project meeting minutes
Sent: 2025-07-24 12:41:19 PM

From: Yen, Wish <wish.yen@cnscccsn.gc.ca>
Sent: April 9, 2024 8:58 AM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Pandolfi, Dana <Dana.Pandolfi@cnscccsn.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: 2024-03-26 ERFN-CNSC monthly project meeting minutes

Good morning Cheyenna,

Please find our March monthly project meeting minutes below. Please don't hesitate to reach out with any edits, questions or concerns.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnscccsn.gc.ca | 343.553.2233



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English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project
March 26, 2024 4-5:30PM EST

Attendees: Cheyenna Hunt, Ryan Froess, Dana Pandolfi, Jes Way, Wish Yen

ERFN Update

- Denison and ERFN had a community meeting mid-March. Denison's experts and ERFN's consultant provided a walkthrough of the licensing process.
 - This meeting was to remind the community that Denison still has to meet additional federal and provincial standards for licensing before shovels hit the ground
 - The community is happy to know that there are still additional requirements that need to be met before Denison can proceed. Some members had felt the process was moving quickly
- ERFN has heard that [other Nations] are threatening legal action against Denison and CNSC
 - ERFN is concerned that [other Nations] are trying to go around ERFN as they make these land claims. Cheyenna's grandmother, ERFN elders and other community members have been walking this land and can demonstrate how they use the lands. ERFN members have never run into [other Nation] members using the land
 - ERFN wants to take actions to ensure ERFN's lands and interests are protected and aren't diluted by [other Nations] claims and stakes

- This could impact ERFN's demonstration that they are the primary users of the land in the hearing
 - ERFN feels like their questions and concerns were diluted by nations on the outskirts of impacted areas/projects for the relicensing hearings
 - [other Nations] are using ERFN member's land use to bolster [other Nations] representation
 - Ideally this can be addressed at the Nation level, but CNSC recognizes that ERFN is a primarily impacted nation because of all the information ERFN shared to date

CNSC-ERFN

- Wheeler River Project updates and RIA discussions in-person at a fall meeting (tag on to the UMMD ROR presentation)

CNSC Technical Reviews

- FIRT SME reviews will be concluding March 29th and is aimed to be completed May 23rd
- CNSC will be setting up technical discussions with Denison once FIRT reviews are in to discuss and attempt to resolve outstanding IRs
- Final EIS is anticipated before the end of 2024, but we will have a better idea of the schedule once this round of technical reviews has concluded

Licensing

- Currently documents are being reviewed or checked for sufficiency
- Preliminary decommissioning plan and financial guarantee documents are currently under review by CNSC and CNSC staff have requested that they be submitted to Province as soon as possible.

Sweat lodge in April

- ERFN will demonstrate continued use of the lands around the Wheeler site as the sweat lodge will be built with rocks and birch brought down from the north and sweetgrass, sage, sweet tobacco offerings and medicines are also harvested from Patuanak
- ERFN will provide tobacco or cloth and ask for blessings on behalf of CNSC and blessings for the land, if you wish to have personal blessings, please bring your own tobacco offering
- Cheyenna will share protocols specific to women (please bring a skirt or dress that will extend to your calves) (Completed)
- Bring a towel and warm clothes

ToR signing

- CNSC's new Registrar will be present, this would be an opportunity for ERFN to provide feedback on positive and negatives of the current hearing processes
- ERFN has a tour of the newly acquired coffee roasting facility planned as part of the signing event

Boser, Sydney

Subject: Hold - ERFN Terms Of Reference signing, sweat and feast
Location: GRASSWOOD ESSO (HWY 11 S,, Saskatoon SK S7K 4E3)

Start: Fri 2024-04-12 12:00 AM
End: Sat 2024-04-13 12:00 AM

Recurrence: (none)

Meeting Status: Accepted

Organizer: Froess, Ryan
Required Attendees: Burton, Patrick; Adam Levine (CNSC/CCSN); Way, Jessica; Nickolet, Sydney; Snider, Richard

More to come...

Meeting in morning – sweat in afternoon, followed by feast into evening with ERFN

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Pour les organisateurs : [Options de réunion](#) | [Réinitialisez la connexion au code NIP](#)

From: [Nickolet, Sydney](#)
To: [Cheyenna Hunt](#); [Angie Campbell](#);
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Gorzowski, Konrad](#); [Way, Jessica](#);
Subject: ERFN & CNSC Monthly Meeting Summary - April 26th
Sent: 2024-05-01 3:42:33 PM

Hey Chey and Angie – please see below the notes from our monthly meeting on Friday. Lots of actions to follow up with on both sides so we will be in touch about those shortly! Hope you both have a great evening 😊

CNSC & ERFN Monthly Meeting – April 26th 10am-11am CST

Participants: Sydney Nickolet, Ryan Froess, Wish Yen, Konrad Gorzowski, Angie Campbell and Cheyenna Hunt

Denison Update:

- CNSC is finalizing the review of Denison's IR's and should be wrapping it up around mid-May but need to have further discussions first - roughly about 50 IR's still remaining
- CNSC would like to meet with Denison to discuss any outstanding IR's within the next month so they are aware on what is still outstanding and how to address them moving forward. There are about 30 outstanding IR's that need further discussion
- CNSC will be wanting to have future discussions with ERFN on the summary of issues and concerns tables to ensure that they have been validated by Denison and ERFN is happy to proceed
- CNSC will be beginning the RIA discussions with ERFN soon
- Denison licensing is going well and there is still a sufficiency check happening and there are only 2 outstanding programs - security and human performance
 - Still waiting to hear back from Denison on timelines for the licensing
 - CNSC can't make a licensing decision until the EA decision is made
- ERFN mentioned the NexGen project and how NexGen has been reaching out with a letter to meet based on CNSC's recommendation. ERFN has mentioned they have no interest in the NexGen project as it is outside their traditional territory however, ERFN is mentioning this because they feel this may also happen for the Denison project and they don't agree that CNSC should be casting the net for Nations so broadly.

TOR for Long Term Engagement:

- CNSC would like to get a photo of the Chief signing the TOR and same goes from our end where Clare will also sign with a photo for CNSC
- ERFN is open to a social media post regarding the signing to share both with ERFN social media accounts and CNSC's
- ERFN will work on the workplan for the TOR and the funding portion
 - Wanting to add a blurb at the bottom of the workplan saying that other issues/projects may come up that can be discussed in the workplan as well
- June may be a good time to have our first kick off TOR quarterly meeting and then September for the second one around the ROR event and the third one in December

-Stream 1 funding is now open and the deadline is June 15th. CNSC will work with ERFN on this and set up a meeting to discuss further

ACTIONS:

- CNSC will set up a future meeting to meet with ERFN regarding the rights impact assessment discussions
- CNSC will work with ERFN on setting up a lunch and learn sharing session with CNSC staff including Stream 3 funding
- ERFN to follow up with CNSC comms team on the signing and photo of the TOR
- ERFN to finalize the TOR workplan and attach a budget to that. CNSC will resend the information to ERFN
- CNSC will send around some potential dates for the first TOR kick off meeting
- CNSC will set up a meeting with ERFN and Adam Levine to talk about the Stream 1 funding. ERFN will send CNSC the application for the guardians program that was denied.

Thanks,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
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I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la patrie des Métis

From: [Yen, Wish](#)
To: [Cheyenna Hunt](#); [Angie Campbell](#);
Cc: [Nickolet, Sydney](#); [Gorzowski, Konrad](#); [Takala, Torin](#); [Pandolfi, Dana](#); [Levine, Adam](#); [Way, Jessica](#); [Froess, Ryan](#);
Subject: 2024-05-30-ERFN-CNSC Monthly meeting minutes
Sent: 2024-06-04 3:59:00 PM

Good afternoon Cheyenna and Angie,

Please find the meeting minutes for our June meeting below for your review. Please don't hesitate to reach out if there are any questions or concerns.

Thank you

Wish Yen (she, her, elle)

Environmental Review Officer | Agente en examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

wish.yen@cnsccsn.gc.ca | 343.553.2233



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English River First Nation (ERFN)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

May 30, 2024 4-5PM EST

Attendees: Cheyenna Hunt, Angie Campbell, Ryan Froess, Torin Takala, Jes Way, Wish Yen

WISTEM Update

- The WISTEM event was well set up and was a great opportunity for Indigenous girls to learn about STEM and reality of university life
- The students found the event to be helpful and fun, but would've appreciated shorter days and activities that weren't related to STEM to have a break
- Cheyenna was thankful to be asked to Co-Chair alongside Karen Owen-Whitred from the CNSC for this event and working alongside other Indigenous women mentors.

Wheeler River Project EA

- CNSC shared back a draft of the technical review results with Denison on Friday May 24th, and will be providing another revised draft in the coming days
- CNSC and Denison will be meeting in person in Ottawa from June 4-6, 2024 to discuss outstanding IRs and the next steps, such as commitments, EA conditions or carry over to the licensing review
- Issues and concerns tables are currently underway and CNSC staff hope to validate the tables during the in-person meetings with ERFN in mid-June
- CNSC-ERFN In-person June 17 meeting in Saskatoon :
 - Overview of outstanding IRs (high level themes)
 - Fulsome look at the next steps in the Wheeler River EA process
 - Review and validation of CNSC's issues and concerns tables
 - Planning the RIA drafting process

Wheeler River Project Licensing

- There are 4 more programs (out of 15) that need to complete the sufficiency check – whether all the content and topics have been provided
- Out of the 11 documents under technical review, only a couple documents remain and will require some discussions at the CNSC-Denison in-person meetings June 4-6, 2024
 - discussions will focus on more detailed engineering aspects of the project

Terms of Reference

- Please share a signed copy with CNSC and a photo of the Chief signing the ToR and CNSC will also have a signed copy to share back
 - CNSC comms team will merge the signing photos together and share out a notification of the ToR signing when ERFN is ready
- The ToR will ensure that CNSC-ERFN have regular annual meetings and funding on CNSC projects following preparation of the workplan

OPG Update

- OPG has reached out to Cheyenna to learn how to engage on low-level waste with Indigenous Nations in Ontario

Funding discussions

- Outline for the ERFN Guardians program and related funding
- Funding would help with the administration planning for the Guardians program as well

Action Items

- Ryan will share potential meeting times for CNSC-ERFN to discuss the ERFN Guardians program (complete by June 6, 2024)

-----Original Appointment-----

From: Froess, Ryan <ryan.froess@cnsccsn.gc.ca>

Sent: Thursday, September 2, 2021 2:56 PM

To: Froess, Ryan; Way, Jessica; Wish Yen (wish.yen@cnscccsn.gc.ca); Cheyenna Hunt; Angie Campbell

Cc: Nickolet, Sydney; Gorzkowski, Konrad; Takala, Torin; Pandolfi, Dana; Levine, Adam

Subject: ERFN/CNSC - Denison Wheeler River Project - Monthly meetings

When: May 30, 2024 2:00 PM-3:30 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

Hi Cheyenna,

As discussed I am resending our monthly meetings as requested.

Proposed Monthly Standing Agenda

ERFN - Update on the Denison Wheeler River Project

CNSC - Update on the Denison Wheeler River Project

CNSC/ERFN - Opportunities for collaboration and to work together (ToR, Rights Impacts Assessment)

Next Monthly Meeting – Topics of Interest and Action Items

We will follow-up with the meeting minutes and any action items from our meetings monthly.

Thanks,

Ryan

Microsoft Teams meeting

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Terms of Reference for English River First Nation – Canadian Nuclear Safety Commission Long-Term Engagement

June 2024

1. Parties involved and Areas of Interest

English River First Nation (“ERFN”) is a First Nation whose members have used and occupied their ancestral lands in northern Saskatchewan for thousands of years to sustain themselves, to carry out their livelihood, and to practice and pass down their culture. In its Dene language, ERFN refers to its ancestral lands as Nuhtsiye-kwi Benene, a map of which is attached as Schedule “A” to these terms of reference. ERFN’s use of Nuhtsiye-kwi Benene, and the corresponding responsibility to protect Nuhtsiye-kwi Benene for future generations, is inherent and sacred.

Over the years, ERFN has identified concerns related to Canadian Nuclear Safety Commission (CNSC)-regulated nuclear facilities and activities, and to the processes under the Nuclear Safety and Control Act (NSCA) related to activities within Nuhtsiye-kwi Benene. This includes impacts to ERFN’s Aboriginal and Treaty rights, interests, culture, or traditional uses, ongoing community use, and reliance on the area.

CNSC is mandated under the NSCA to regulate the use of nuclear energy and materials to prevent unreasonable risk to health, safety, security, and the environment; to implement Canada’s international commitments on the peaceful use of nuclear energy; and to disseminate objective scientific, technical, and regulatory information to the public.

As an agent of the Government of Canada and as Canada’s nuclear regulator, the CNSC recognizes its responsibility to uphold the honour of the Crown and meet its consultation and accommodation obligations relating to the interests of ERFN when its decisions could potentially affect ERFN’s rights and interests. The CNSC prioritizes the importance of a strong relationship with ERFN given the fact of uranium extraction in Nuhtsiye-kwi Benene and potential for adverse impacts to ERFN Aboriginal and Treaty rights.

2. Vision

ERFN and CNSC are committed to the establishment of a meaningful and collaborative approach to address issues and concerns that ERFN may have in relation to areas of interest, consultation on potential amendments to the NSCA, and issues or concerns related to CNSC-regulated nuclear facilities and activities of interest (“CNSC Activity” or “CNSC Activities”). The parties are committed to working together to address consultation and accommodation obligations, regulatory processes, and potential environmental impacts that may arise from CNSC Activities.

ERFN and CNSC staff will work together to identify areas of interest and address issues or concerns important to ERFN related to CNSC-regulated nuclear facilities and activities in Nuhtsiye-kwi Benene.

3. Purpose and Objectives

The purpose of these Terms of Reference are to strengthen the ERFN –CNSC relationship through ongoing respectful and open dialogue regarding CNSC Activities that are of interest to ERFN. These Terms of Reference further aim to provide procedures and principles to ensure:

- Clarity on the roles and responsibilities of the parties involved.
- Ongoing, respectful, and open communication – i.e., the parties involved come to the table with a view to finding solutions, are open, listen, and respect each other's views.
- Collaboration and participation in the process steps in a timely and efficient manner.

4. Relevant Facilities and Activities of Interest

The projects and facilities that are covered by these Terms of Reference include, but are not limited to:

Operating uranium mines and mills

- Key Lake Operation
- McArthur River Operation
- Cigar Lake Operation
- Rabbit Lake Operation

Proposed new projects

- Denison's proposed Wheeler River project
- Cameco's proposed Millennium project

5. Governance

Collaboration under these Terms of Reference will be co-managed by ERFN and CNSC staff through a Working Group.

Working Group

The parties will, within thirty (30) days of the signing of this agreement, form a joint Working Group. It will be composed of 6 members appointed by ERFN and 2 members appointed by CNSC staff. Each party will appoint their respective members by delivering written notice to the other party. Parties may invite guests, including advisors, to attend Working Group meetings if notice is provided in advance to the other party.

Co-Chairs

ERFN and the CNSC will each appoint one member of the Working Group as their Co-Chair. Either party may also appoint a delegate for their Co-Chair.

Replacement of a Member or Co-Chair

Either party may replace a member that they have appointed to the Working Group. To replace a member, the respective party must deliver written notice to the other party, to the Co-Chairs and to the affected member who is to be replaced. Either party may further replace their Co-Chair by following the same procedure.

6. Meetings

Frequency

Working Group meetings under these Terms of Reference will occur quarterly. Additional collaborative activities may occur at the discretion of the Co-Chairs.

Location

ERFN – CNSC collaborative activities under these Terms of Reference will be held using a hybrid approach of virtual meetings and in-person meetings at locations agreed to by the Co-Chairs of the Working Group. The Co-Chairs will consider the most efficient use of limited resources when agreeing to locations for in-person meetings.

Agenda and Agenda Items

An agenda will be developed for each meeting and will be agreed to by the Co-Chairs of the Working Group, or their designate. Such an agenda may include information regarding any CNSC Activity that requires additional consultation or collaboration between the CNSC and ERFN.

This agenda and any supporting materials will be distributed at least five (5) business days in advance of a meeting.

Dispute Resolution

The Working Group will aim to resolve any disagreements in an amicable and expeditious manner. Disagreements that are not resolved by the Working Group may be immediately referred by either Co-Chair to the [Position] for the CNSC and the Chief of ERFN for resolution. The parties will then attempt to resolve the matter in good faith with a view to achieving consensus. If consensus cannot be achieved on some matters, ERFN will still retain the opportunity to present the issue before the Commission in accordance with existing procedures.

Record-keeping

The Co-Chairs, or their designate, are responsible for preparing summaries or minutes for meetings, workshops, or other activities conducted under these Terms of Reference, including agreed upon action items. Summaries or minutes will be reviewed by the parties and approved by the Co-Chairs, or their designate.

Funding

Reasonable funding to facilitate participation in meetings under these Terms of Reference will be provided by the CNSC. This may be provided through the CNSC's funding programs. On an annual basis the ERFN-CNSC Working Group will develop a proposed budget based on the annual workplan. The budget proposal will be submitted by ERFN to the CNSC and follow the CNSC's funding programs application approvals process, including the review and recommendations by the Funding Review Committee.

Other Participants

Subject to the approval of the Co-Chairs, or their designate, other participants, such as subject matter experts, licensee representatives, academics, other Indigenous peoples and members of the public, may be involved in collaborative activities.

7. Reporting

The Co-Chairs are responsible for ensuring that there is summary reporting and updates provided to the leadership of ERFN and to the CNSC Commission through a relevant Commission Member Document such as a Regulatory Oversight Report.

At least once every year, ERFN representatives and CNSC staff will prepare a written summary and distribute to the ERFN Chief and Council and to the Commission on the progress and any related outcomes of collaborative activities.

8. Review and Amendment

These Terms of Reference will be reviewed at least once a year to ensure that they continue to support collaboration on issues or concerns of interest to ERFN related to CNSC-regulated nuclear facilities and activities on Nuhtsiye-kwi Benene.

These Terms of Reference may be amended by written agreement of ERFN and the CNSC.

9. Duration

These Terms of Reference are intended to help formalize and strengthen the ERFN - CNSC relationship for the long term. If either the ERFN or CNSC staff come to view these Terms of Reference as no longer facilitating meaningful collaboration on issues or concerns of interest to ERFN related to CNSC-regulated nuclear facilities and activities, either party can, with 60-days' written notice, request that these Terms of Reference be terminated.

10. Notices

Any notice required to be given under these Terms of Reference to the other Party shall be sufficiently given if physically delivered, or sent by email upon return email confirmation of receipt:

In the case of notice to English River First Nation, to:

English River First Nation
General Delivery, Patuanak SK, S0M 2H0
Attention: Chief

and to:

English River First Nation Lands and Resources Office
301-2555 Grasswood Road Saskatoon, SK S7T 0K1
Attention: Director, Lands and Consultation
Cheyenna.hunt@desnedhe.com

In the case of notice to the Canadian Nuclear Safety Commission, to:

Canadian Nuclear Safety Commission
Ryan Froess- Senior Advisor, Indigenous Consultation
ryan.froess@cnsccsn.gc.ca

Signatories

Clare Cattysse

Director - Indigenous and Stakeholder Relations
Division
Canadian Nuclear Safety Commission

Alfred Dawatsare

Chief – English River First Nation

X

X



Annex A: English River First Nation's Principles for Consultation and Engagement

For any CNSC regulated project, facility or activity that could raise the Duty to Consult and Accommodate, English River First Nation (ERFN) expects the CNSC and ERFN to follow a thorough, western science and Indigenous science, evidence-based approach for collaboration and consultation with regards to the project and regulatory process.

The process for collaboration and consultation will be consistent with the Government of Canada's commitments with respect to recognition, protection, and upholding of the rights of Indigenous peoples, including the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), ERFN's Aboriginal and Treaty rights, interests, culture, or traditional uses.

ERFN and CNSC staff will work collaboratively to assess the adequacy of proposed measures including mitigation, follow-up and monitoring, and/or any other measures proposed by third parties, the CNSC, the Province of Saskatchewan, or other Government organizations, to mitigate, avoid, or offset any identified or reasonably foreseeable adverse impacts on ERFN's Aboriginal and Treaty rights as a result of proposed projects regulated by the CNSC, as appropriate.

Steps taken for a collaborative consultation process should include collection of Traditional/Indigenous Knowledge, in addition to the perspectives of ERFN members and ERFN leadership. Any reports or agreements will clearly demonstrate how this Traditional/Indigenous Knowledge has informed outcomes, in accordance with these principles or any other mutually agreed upon process(es) as between the parties in conducting meaningful consultation with ERFN.

ERFN expects that the consideration of potential adverse impacts as a result of a CNSC activities or decisions to ERFN's Aboriginal and Treaty rights, interests, culture, and traditional uses, through a principled methodology will help improve the CNSC's decision-making processes and will advance the objectives of reconciliation. Processes and methodologies that are collaboratively designed and mutually agreed by Indigenous peoples and governments improve the understanding and assessment of a project's potential effects on Aboriginal and Treaty rights, interests, culture, or traditional uses. Further, by establishing these cooperative processes, the CNSC may better understand and consider the Traditional/Indigenous Knowledge and cultural values of ERFN, as well as ERFN's laws and traditions.

For any potential project or regulatory process undertaken by the CNSC that could raise the duty to consult and accommodate ERFN, ERFN expects the CNSC and ERFN to collaboratively follow these process steps and principles:

- Creation of a project specific information sharing and consultation protocol
- Funding support for ERFN
- Participation in the technical review process
- Community engagement
- Assessment of potential impacts on ERFN's Aboriginal and treaty rights
- Negotiation and considerations of mitigation and accommodation measures to address any identified impacts on ERFN's rights and interests

These process steps and principles can be further elaborated on in a project specific consultation arrangement, such as a Terms of Reference for consultation between ERFN and the CNSC.

Edoc # 7103668



From: [Way, Jessica](#)
To: [Cheyenna Hunt](#)
Cc: angie.campbell@desnedhe.com; [Froess, Ryan](#); [Yen, Wish](#); [Nickle, Sydney](#);
Subject: For Review - Issues and Concerns Table for ERFN
Attachments: [E-DOCS-#6769022-v2-ERFN-Issues_and_Concerns_Tables_for_Wheeler_River_EA.XLSX](#)
Sent: 2024-06-20 4:20:17 PM

Hi Cheyenna,

I have a few notes jotted down from our meeting earlier this week and the presentation to share (all to come), but I didn't want to delay in sending along the issues and concerns table we promised.

Please see attached, CNSC's draft issues and concerns table for your review. These are compiled from meeting minutes, the traditional land use studies shared by ERFN, as documented by Denison in the draft EIS and Indigenous Engagement Report, as noted in ERFN's submission to the comment period of the draft EIS, and what has been shared with CNSC in informal discussion. Some of these have required responses from Denison, and others will require that CNSC provide responses that will be incorporated into the responses to the Indigenous and Public comment tables.

We want to ensure that all issues and concerns are adequately captured, and whether all topics have been resolved to ERFN's satisfaction, or there are any outstanding issues or concerns in this table to be discussed. If you have time to take a look before our next meeting then we can make this focus of our meeting on Tuesday.

Please take a look at the tab titled "Detailed Working Table" (this has the yellow/orange lines). The "Source" tab is just for our reference, and the "Summarized EA Report Table" will be populated at a later date, to include this information in the EA report we draft.

Looking forward to discussing further in our meeting on Tuesday. If you don't get time to look before then, please let us know if you want to postpone.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Review Specialist | Spécialiste d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

My work hours might not be the same as your work hours – please reply at your convenience.

From: [Nickolet, Sydney](#)
To: [Cheyenna Hunt](#); [Angie Campbell](#);
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Yen, Wish](#); [Gorzkowski, Konrad](#); [Pandolfi, Dana](#); [Noakes, Rain](#);
Subject: ERFN & CNSC Monthly Meeting Notes - June 25th
Sent: 2024-06-28 9:08:00 AM

Hi Cheyenna and Angie,

Please see below the notes from our meeting on Tuesday. Hope you both have a great long weekend! 😊

CNSC & ERFN Monthly Meeting – June 25th 2pm-3pm CST

Participants: Ryan Froess, Sydney Nickolet, Jessica Way, Konrad Gorzkowski, Dana Pandolfi, Rain Noakes, Cheyenna Hunt and Angie Campbell

- The next couple of meetings are going to focus on more specific aspects of the Denison project like issues and concerns, rights impact assessments and the EA report.
- The summary of issues and concerns table was sent to Cheyenna to review and discuss. We will discuss this at our next meeting on July 23rd.

ROR:

- The ROR has now been moved to the end of January 2025 right before the Beaverlodge hearing in Saskatoon.
- September 18th is the day of the in-person ROR engagement session and should work for ERFN.
- The CMD won't be posted until October but ERFN is okay with the engagement session going ahead in September anyway for the ROR. CNSC staff will work to provide a brief overview of the facilities in Saskatchewan for the session.

Funding:

- ERFN has narrowed their guardians program application down and can apply under Stream 3 in the interim until Stream 1 opens again next year.
- Anne from the funding team will reach out with a grant application form for the TOR budget and workplan for ERFN to fill out if she hasn't already.

Denison Licensing:

- Denison came to Ottawa for in-person meetings to discuss the design of their proposed facility (ISR technology).
 - A lot of the discussions were around water, run off and taking water off site.

ACTIONS:

1. CNSC will check if July 23rd works for our next meeting to discuss the issues and concerns tables and if not, will provide an alternative time to ERFN.

Thanks,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division

Canadian Nuclear Safety Commission

Email: sydney.nickolet@cnscccsn.gc.ca

New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées

Commission canadienne de sûreté nucléaire

Email: sydney.nickolet@cnscccsn.gc.ca

New Phone Number: 343-596-9556

I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis

Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la patrie des Métis

English River First Nation (ERFN) - Canadian Nuclear Safety Commission (CNSC)

ERFN-CNSC Working Group Meeting

In-Person Saskatoon, ERFN Urban Reserve

September 19, 2024, 9:00 am – 1:00 pm

Attendees:

ERFN Councillor - Jenny Wolverine

ERFN Director of Lands and Resources (Co-Chair) - Cheyenna Hunt

ERFN Elder – Fred Campbell

ERFN – CNSC Pathfinder - Angie Campbell

ERFN Youth – Olivia Maurice

ERFN Land User – Bernie Eaglechild

Director - Uranium Mines and Mills Division - Patrick Burton

Director General - Directorate of Nuclear Cycle and Facilities Regulation – Luc Sigouin

Senior Advisor - Indigenous Stakeholder Relations (Co-Chair) – Ryan Froess

Policy Officer – Indigenous and Stakeholder Relations - Sydney Nicolet

Project Officer – Uranium Mine and Mills Division – Konrad Gorzkowski

Draft Agenda:

9:00 – 9:30 am

- Welcome , Introduction, & Opening prayer/remarks
- Review and adopt agenda for todays meeting
- Review in detail the CNSC/YNLR Workplan for 2024-2025 (we can print off copies)
- Workplan discussion and questions/additions
- CNSC /ERFN update on funding opportunities (UMM ROR, ToR, other)

Break - 10:30 until 10:45 am

- CNSC provide update on upcoming hearings
- CNSC update on Denison Wheeler River Project

Lunch - 11:45 – 12:30

- Other Business and next meeting date – Q1 2025
- Closing Prayer

Meeting Adjournment at 1:00 pm

From: [Way, Jessica](#)
To: alfred.dawatsare@erfn.net
Cc: [Cheyenna Hunt](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Gorzkowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Frigault, Nicole](#); [Way, Jessica](#); [Froess, Ryan](#); [Levine, Adam](#); [Noakes, Rain](#); [Dereniowski, Jeff ENV](#); [Piper, Candace ENV](#);
Subject: Wheeler River Field Test - Renewal Notification Letter to ERFN
Attachments: [E-DOCS-#7421361-v1-2024-12-05-Wheeler_River_Field_Test_-_Renewal_Notification_Letter_to_ERFN.pdf](#)
Sent: 2024-12-07 4:54:00 PM

Dear Chief Dawatsare,

The purpose of the attached letter is to notify you of an application for renewal from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,

Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.



December 7, 2024

e-Doc: 7421361

Chief Alfred Dawatsare
English River First Nation
alfred.dawatsare@erfn.net

**Subject: Denison Wheeler River Project - Nuclear Substances and Radiation Devices
Licence Renewal Application**

Dear Chief Dawatsare:

This letter is to inform you that Denison Mines Corp. (Denison) has submitted an application to the Canadian Nuclear Safety Commission (CNSC) to renew Nuclear Substances and Radiation Devices licence No. 60677-1-24.0, issued for the Wheeler River Exploration Project in northern Saskatchewan. This licence application is for the temporary storage of natural uranium collected during the Feasibility Field Test. The recovered material will be temporarily stored above ground while Denison pursues a licence to continue operations at the Wheeler River site.

Proposed Wheeler River Project

The Wheeler River Property is located in the eastern part of the Athabasca Basin, approximately 4 km west of Highway 914 and 35 km north of the Key Lake mill. Denison has proposed a project to construct, operate, and decommission an in-situ uranium mine. An [Environmental Assessment \(EA\) under the Canadian Environmental Assessment Act of 2012](#) (CEAA 2012), led by CNSC staff, has been underway since 2019 for the proposed Wheeler River Project,. Concurrently, the Government of Saskatchewan is also leading a [provincial EA](#).

Field work at the site has been occurring since 2007, with advanced drilling and testing occurring since 2019. These activities have had continual oversight from the Saskatchewan Ministry of Environment, and the CNSC, as necessary.

Feasibility Field Test

The feasibility field test has concluded and the recovered mineralized material containing natural uranium is currently in above ground storage tanks at the Wheeler River site. The material remains the property of the Crown, under the oversight of the Saskatchewan Ministry of Environment (SMOE).

Denison's current request to renew the Nuclear Substances and Radiation Devices licence is to permit the mineralized solution to remain at the site and perform sampling of the material for further analysis. There is no change to the design or construction of storage tanks and protective barriers at the site. Likewise, there is no change to the CNSC regulatory requirements imposed through this licence.

The licence is proposed to have a term of two years, expiring December 31, 2026. Denison would be required to either renew the Nuclear Substances and Radiation Devices licence, transfer the material to another CNSC licence, or remove the material from the Wheeler River site prior to expiry of this licence.

Licensing Process

Unlike Class I nuclear facilities and uranium mines and mills, licences for use of Nuclear Substances and Radiation Devices are issued by a Designated Officer (DO) of the CNSC. A DO is a member of CNSC staff who has been designated specific powers under the *Nuclear Safety and Control Act* with respect to licensing and compliance. Like the Commission, DOs demonstrate independence and procedural fairness. With their extensive knowledge, regulatory training and operational experience, DOs are well qualified to make decisions on behalf of the Commission. DO decisions are based on rigorous reviews performed by CNSC staff, who verify that the applicant would meet regulatory requirements. After completing their evaluations, CNSC staff prepare DO documents – which include technical and regulatory information, conclusions and recommendations – to help inform DO licensing decisions.

DOs will only grant the licence if they are satisfied that the authorized activities do not pose a risk to health, safety, security and the environment.

Further Information

CNSC staff will continue to keep you apprised of the status of this licence application, DO decision and next steps, including more information on the CNSC's licensing requirements and oversight activities should a renewed licence be granted to Denison.

If you would like to meet to discuss in further detail, and have any questions relating to this licence renewal application for the Wheeler River Project, please contact:

- Jes Way, Environmental Review Officer, Wheeler River EA Lead
Email: jessica.way@cnsccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous Consultation and Engagement Division
Email: ryan.froess@cnsccsn.gc.ca

If you haven't already, you may also sign-up to the CNSC mailing list to receive notifications CNSC website is updated, including notices for hearings, meetings and Participant Funding Program opportunities. Visit the following link and choose the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

Sincerely,



Nicole Frigault

A/Director, Environmental Review Division
Canadian Nuclear Safety Commission
E-mail: nicole.frigault@cnsccsn.gc.ca

c.c.: C. Hunt, ERFN
S. Faille, N. Babcock, P. Burton, K. Gorzkowski, N. Kwamena, J. Way, R.
Noakes, A. Levine, R. Froess, CNSC
J. Dereniowski, C. Piper, SEASB

Wheeler River – Monthly Meeting with ERFN

Title: Wheeler River – Monthly Meeting with ERFN

Date: December 17, 2024

Participants:

- **CNSC:** Jes Way, Torin Takala, Brenda Duhaime, Sydney Nickolet, Ryan Froess, Rain Noakes
- **ERFN:** Cheyenna Hunt & Angie Campbell

Agenda:

- Discuss Denison's Final EIS acceptance
- Provincial EA status
- Participant Funding Program
- Hearings, Interventions, ROR

Summary:

- **Final EIS Review:** Jes updated the team on the final EIS review process, mentioning that the deadline for the Denison final EIS Acceptance is December 21st. If everything is adequately incorporated, they will send Denison a letter confirming the acceptance of the final EIS and post everything on the registry. In the new year, they will work on the EA report and compile conclusions from subject matter experts.
 - **Final EIS Submission:** Jes mentioned that the final EIS was provided by Denison on November 22nd, and the team has been reviewing it to ensure all necessary information is incorporated. The deadline for confirming the adequacy of the EIS is December 21st, after which a letter will be sent to Denison confirming its acceptance.
 - **Registry Posting:** Once the final EIS is accepted, it will be posted on the registry. This step is crucial for transparency and public access to the document.
 - **EA Report Preparation:** In the new year, the team will focus on preparing the EA report, which involves compiling conclusions from subject matter experts. This report will summarize the findings and provide a comprehensive overview of the environmental assessment.
 - **Hearing Timelines:** Jes noted that there are ongoing discussions about the timelines for a hearing, which will depend on the registrar's decisions. This is a critical step in the process, as it will determine the schedule for further evaluations and public consultations.
- **Provincial EIS Review:** Cheyenna discussed the provincial EIS review, mentioning that they received funding from the ministry and Denison. They hired Robin to review the provincial version of the EIS to ensure it aligns with the letter of support from ERFN. Cheyenna requested the most recent copy of the EIS from Jes.

- **Funding Sources:** Cheyenna mentioned that they received funding from both the ministry and Denison to support the provincial EIS review. This funding is crucial for ensuring a thorough and independent review process.
- **ERFN's Review:** New hire to review the provincial version of the EIS to confirm that it aligns with the letter of support previously issued by ERFN. This step is essential to ensure consistency and accuracy in the documentation.
- **EIS Copy Request:** Cheyenna requested the most recent copy of the EIS from Jes, as they were having difficulty locating it online. Jes mentioned that the versions they have are large and not yet posted, but she would try to provide a preview link or suggest contacting Denison directly for access.
- **Response Deadline:** Cheyenna highlighted the urgency of the review, as they need to respond to the Ministry of Environment by December 22nd. This tight deadline necessitates prompt access to the necessary documents for Robin's confirmation.
- **Funding and Budget:** Ryan and Cheyenna discussed the remaining \$22,000 in the budget for Denison's terms of reference. Cheyenna will review her budgets to confirm if the amount is still available or if it has been spent.
- **Licensing Update:** Brenda introduced herself as the new lead on the file, taking over from Konrad. She provided an update on the sufficiency review, weekly meetings with Denison, and the project plan and strategy for the CMD. Torin mentioned the administrative monetary penalty issued to NextGen for preparation of the site without a license.
 - **New Lead Introduction:** Brenda introduced herself as the new lead on the file, taking over from Konrad, who is on paternity leave. She is a senior project officer with the uranium mining and mill division.
 - **Sufficiency Review:** Brenda provided an update on the sufficiency review, stating that it is completed. The team is now focused on reviewing additional documentation and meeting weekly with Denison for updates.
 - **Project Plan and CMD:** The team is working on the project plan and strategy for the CMD (Commission Member Document). This involves detailed planning and coordination to ensure all necessary information is included and accurately presented.
- **Next Steps and Hearing Timelines:** Ryan and Cheyenna discussed the next steps in the Denison process, including sending a letter in the new year outlining hearing timelines, PFP announcements, and other next steps. They also discussed the need to reapply for Angie's position and the importance of having funding in place for the review process.
 - **Next Steps Letter:** Ryan mentioned that they will send a letter in the new year outlining the next steps in the Denison process, including hearing timelines, PFP announcements, and other important details. This letter will provide a clear roadmap for the upcoming activities.

- **Angie's Position:** Cheyenna noted the need to reapply for Angie's position, as her term is ending next fall. This is crucial to ensure continuity and support for the ongoing work.
- **Funding for Review:** Ryan emphasized the importance of having funding in place for the review process. This includes ensuring that financial resources are available ahead of time to support the review of documents and participation in hearings.
- **Hearing Timelines:** Ryan discussed the hearing timelines, mentioning that they are tracking towards a hearing in the new year. This will be a significant milestone in the Denison process, marking the first new uranium mine hearing in northern Saskatchewan in over 20 years.
- **Cancer Study Grant:** Cheyenna mentioned that they received a grant for a two-year study on cancer rates and the medicines and plants they harvest. This study is a continuation of a previous food study funded by Health Canada.

Follow-up tasks:

- **Final EIS Review:** Send Denison a letter confirming the final EIS has been accepted if everything is adequately incorporated by December 21st. (Jes)
- **Provincial EIS Copy:** Send Cheyenna a preview link or an official version of the EIS for Robin to review and confirm it matches the approved version. (Jes)
- **Budget Review:** Check the budget to confirm if the 22K funding has been spent or is still available. (Cheyenna)
- **Access to EIS:** Reach out to Brianne England at Denison to get access to the EIS file share. (Cheyenna)
- **Financial Review:** Review financials to ensure funding is available in January for early 2025 work. (Cheyenna)
- **Letter of Support:** Draft and send a letter of support to the Ministry of Environment by December 22nd. (Cheyenna)

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan; Way, Jessica;](#)
[alfred.dawatsare@erfn.net; cheyenna.hunt@desnedhe.com; jenny.wolverine@erfn.net;](#)
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[scoupland.sgcresearch@gmail.com; mirmirans@cna.ca; Bruce Hanbidge; Dennis Sherratt;](#)
[jessielacosta2017@gmail.com; Damien Georges; Gorzkowski, Konrad; Kwamena, Nana-Owusua; Burton,](#)
[Patrick; Takala, Torin; Paul James; Noakes, Rain; McKeown, Justin; Nickolet, Sydney; Chani Campbell;](#)
[Janna Switzer; Brianne England; Carolanne Inglis-McQuay; Executive Secretary; Margaret Rosling;](#)
[alfred.dawatsare@erfn.net; Brianne England; Kwamena, Nana-Owusua; Frigault, Nicole;](#)

Subject: CNSC Wheeler River December 2024 EA Update - Accepted Final EIS

Sent: 2024-12-24 12:28:00 PM

Hi Everyone,

In our last update, we noted the completion of the technical review of Denison Mines Corp.'s (Denison) responses to outstanding Information Requests (IRs) for the Wheeler River environmental impacts statement (EIS). This update had also indicated that on November 22nd Denison submitted a final EIS package.

Following a 30 day review, the Canadian Nuclear Safety Commission (CNSC) has accepted the final EIS. This acceptance follows a comprehensive EIS technical review process by the Federal Indigenous Review Team (FIRT), including consultations with Indigenous Nations and communities and members of the public. CNSC staff will now proceed with the preparation of the *Canadian Environmental Assessment Act, 2012* Environmental Assessment (EA) Report, which will be made available, along with a Commission Member Document, for review by Indigenous Nations and communities and the public prior to a public Commission hearing.

The following documents have now been posted to the Canadian Impact Assessment Registry (CIAR) for this project:

- [Letter: CNSC to Denison- Wheeler Project- Acceptance of the Final EIS and Supporting Documents](#)
- [Final environmental Impact Statement](#)
- [Combined Final EIS Appendices](#)
- [Commitments Register Version 5- Wheeler River Final EIS Submission](#)

With these conclusions, along with the sufficient licence application, CNSC staff will notify CNSC Commission Registrar of this acceptance, who will proceed with scheduling public hearing dates. Further details regarding how to participate will be provided once the Commission Secretariat has announced the hearing dates. In early January, notifications will be sent to Indigenous Nations and communities with detailed next steps in the consultation process.

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)



Tel: 306.649.6111

English River First Nation
301-2555 Grasswood Road
Saskatoon, SK S7T 0K1

Fax: 306.664.8923

January 17, 2025

Mr. Pierre Tremblay
President and Chief Executive Officer

Pierre.Tremblay@cnsccsn.gc.ca

Mr. Ramzi Jammal
Executive Vice-President and
Chief Regulatory Operations Officer
Ramzi.jammal@cnsccsn.gc.ca

RE: Timeline for Approval of the Wheeler River Project

We are writing to express our congratulations to the CNSC, the CNSC staff, and the Federal Indigenous Review Team (“FIRT”) for all of the work done to determine and announce that Denison Mines has filed a satisfactory final Environmental Impact Statement for the Wheeler River Project, and will now be subject to a hearing process by the Commission. We would like to recognize the CNSC for including English River First Nation’s own subject matter expert, Ms. Cheyenna Hunt, on the FIRT team where she was respectfully considered as a valuable contributor to this highly skilled team.

The Wheeler River Project is within the boundaries of Treaty 10 and the Nhutsiye-kwi Benéne (Ancestral Lands) of ERFN. As such, we can confirm to you that Denison has gone to substantial effort over year to educate itself on the various ways in which the Project poses potential risks to ERFN rights and interests. Denison has worked closely with ERFN to design suitable mitigation measures aimed at ensuring minimal impact and provide economic benefits for ERFN and its members. The work we have done together has resulted in ERFN providing consent and support for the Project – following the successful completion of a community ratification vote in favour of the Project.

The Des Nedhe Development Corporation was established by ERFN in 1991, and is mandated to grow sustainable employment and business opportunities for ERFN community members. For generations, the local Dene people have used the word Des Nedhe to describe the “great river” that flows next to them – known today as the Churchill River in northern Saskatchewan. Like that great river, Des Nedhe Group is powerful and relentless – always moving forward. In that spirit, the Des Nedhe Group has been working closely with Denison to ensure that our businesses and associated opportunities are ready to be deployed at the Wheeler River Project for when construction commences.

With the community ratification vote having been completed over a year ago and with substantial progress and investment being made to ready our businesses to support Denison's execution of the Wheeler River Project, we are requesting that the Commission consider the importance of the forthcoming hearing and approval process for the Project to be completed as soon as possible – ideally, before the end of 2025. Our businesses and Members are ready to be meaningfully involved in this Project, and we believe it would be inconsistent with the CNSC's expressed interest in applying the principles of UNDRIP and the Calls to Action from the Truth and Reconciliation Report, to not act immediately to approve a project that has been deemed technically and environmentally sound and has secured ERFN's consent to be built in our ancestral lands.

We have observed that Denison has consistently demonstrated that it is a capable and trustworthy partner and has already successfully navigated an extensive and extended evaluation of the Project by both the Federal and Provincial government. Accordingly, we believe that it is in the best interest of all parties for the remainder of the approval process to proceed rapidly.

We thank the CNSC and its staff for the responsible oversight of this project, and invite you to contact either of us at the contact information provided below should you require any further information.

Sincerely,



Alfred Dawatsare
Chief of English River First Nation



Sean Willy
President and CEO of Des Nedhe Group

From: [Way, Jessica](#)
To: alfred.dawatsare@erfn.net
Cc: [Levine, Adam](#); [Burton, Patrick](#); [Way, Jessica](#); [Froess, Ryan](#); [Duhaime, Brenda](#); [Gorzowski, Konrad](#); [Noakes, Rain](#); [Zenobi, Adam](#); [Cheyenna Hunt](#); angie.campbell@desnedhe.com; [Wheeler River Project - Projet de Wheeler River](#);
Subject: Next Steps of Consultation with ERFN - Proposed Wheeler River Project
Attachments: [2025-01-22-Letter-CNSC_to_ERFN_-_Next_steps_of_the_Regulatory_Process-Wheeler_River_EA.pdf](#)
Sent: 2025-01-22 6:47:03 PM

Dear Chief Dawatsare,

I am sending the attached letter on behalf of the CNSC, outlining proposed next steps of the CNSC's consultation process with English River First Nation for the Wheeler River regulatory review process.

We look forward to hearing back from you and setting up a meeting to discuss further.

Sincerely,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.



CIAR NO.: 80178

e-Doc: 7444175

January 22, 2025

Chief Alfred Dawatsare
English River First Nation
General Delivery, Patuanak SK
S0M 2H0
alfred.dawatsare@erfn.net

Subject: Proposed Next Steps of Consultation with English River First Nation for the Remaining Steps of the Regulatory Review Process for the Proposed Wheeler River Project

Dear Chief Dawatsare:

The purpose of this letter is to provide an update and share a proposed consultation approach with English River First Nation (ERFN) on the remaining steps of the regulatory review process for Denison Mines Corp.'s (Denison) proposed Wheeler River Project (the Project).

Current Status of the Process of the federal Environmental Assessment

On December 24, 2024, the federal review of Denison's Environmental Impact Statement (EIS) concluded, and the Final EIS was accepted by CNSC staff as it meets the requirements of the *Canadian Environmental Assessment Act*, 2012 (CEAA, 2012). As communicated in CNSC's December 24th, 2024 email to the project distribution list for the project, the documents can be found on the [Canadian Impact Assessment Registry \(the Registry\)](#).

CNSC staff have reviewed the responses Denison provided to comments that were received during the public comment period on the draft EIS in 2023, including those from ERFN. The comments and Denison's responses are now [available on the Registry](#). CNSC staff have also drafted responses to comments that were applicable to CNSC's oversight and responsibilities and look forward to further discussing these as part of our proposed next steps as described below. CNSC's responses to these comments can also be [found on the Registry](#).

Proposed Next Steps of Consultation

Building on the ongoing consultation, relationship building, and engagement that began in 2019 between ERFN and CNSC in relation to the Project, CNSC staff provide the consultation approach as outlined in Appendix 1. Table 1 of this letter details the suggested consultation and collaboration activities for the remaining steps of the regulatory review process for the Project.

The CNSC staff will be preparing the following reports and documents to support staff's recommendations to the Commission:

- **An EA Report** which provides information and analysis to assist the Commission in its determination on whether the proposed project is likely to cause significant adverse environmental effects.
- **A Consultation Report** which will include an assessment of the Project's potential impacts to the Rights and interests of select Indigenous Nations and communities as well as recommendations regarding the Duty to Consult and Accommodate and ERFN's perspective and position on their Free, Prior and Informed Consent (FPIC), as appropriate.
- **A Commission Member Document (CMD)** which presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation.

CNSC staff are interested in collaborating with ERFN to ensure that ERFN's perspectives, issues and concerns, Indigenous Knowledge and Land use information, potential impacts of the proposed Project on ERFN rights, and other topics of interest to ERFN are properly reflected in CNSC staff's reports and recommendations. This would involve CNSC staff developing the content as a first step based on information that ERFN has submitted and provided to date to the CNSC and Denison and then sharing the draft content with ERFN representatives for their review and comment. CNSC staff will be providing detailed timelines on the remainder of the regulatory process once a Commission hearing date has been identified by the Commission Registry.

The activities outlined in the proposed consultation approach are flexible, and CNSC staff would like to discuss the remaining steps of the regulatory review process with ERFN. Some potential topics for discussion include:

- review of and input to the CNSC's assessment of the Project's potential impacts on ERFN rights and interests.
- review of sections of CNSC's EA report, CMD and Consultation Report, specifically related to information on ERFN community member perspectives, knowledge, land use, concerns, and rights.
- awarding funding through the CNSC's PFP to support the review of CNSC staff's Reports and consultation and engagement with the CNSC.
- discussions and collaboration with the CNSC and Denison, as appropriate, regarding potential commitments, mitigations and accommodations to address potential impacts on ERFN's rights and interests.
- participation in the CNSC's Commission hearing process through interventions as well as collaboration on the inclusion of ERFN cultural practices and protocols as part of the Commission hearing process, as appropriate.
- discussions on the assessment and overall evaluation of Denison's engagement activities with ERFN as per REGDOC 3.2.2: Indigenous Engagement.
- discussions and collaboration with the CNSC on conclusions and recommendations related to topics of concern and interest to ERFN.

CNSC staff are committed to continued collaboration with ERFN to ensure that the consultation for the Project is meaningful, addresses ERFN's concerns, protects your Nation's rights and interests, and upholds the Honour of the Crown. To discuss any matters related to the regulatory review process of the Project, please contact:

- Jes Way, Environmental Review Officer, Wheeler River EA Lead
Email: jessica.way@cnscccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous Consultation and Engagement Division
Email: ryan.froess@cnscccsn.gc.ca

Please review the proposed consultation process for the remaining steps of the regulatory review process for the Wheeler River Project (Appendix 1) and **provide any feedback by February 17, 2025 or we would be happy to set up a meeting to discuss.**

The CNSC looks forward to continuing to build a long-term relationship with ERFN and working together throughout the regulatory review process for the proposed Wheeler River Project.

Yours sincerely,



Nana Kwamena
Director
Environmental Review Division
Canadian Nuclear Safety Commission



Justin McKeown
A/ Team Leader, Western & Northern Regions
Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission

c.c./c.c. : CNSC: A. Levine, P. Burton, J. Way, R. Froess, B. Duhaime, K. Gorzkowski, R. Noakes, A. Zenobi
ERFN: C. Hunt, A. Campbell

Enclosure: (1) Proposed consultation process with English River First Nation for the regulatory review process of the Wheeler River Project

References:

- [1] CNSC, Regulatory Guide, *REGDOC- 3.2.2: Indigenous Engagement*, Version 1.2, February 2022, <https://www.cnscccsn.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc3-2-2-v1-2/>
- [2] CNSC, *Generic Guidelines for the Preparation of an Environmental Impact Statement*, May 2016, <http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>

Appendix 1

Proposed Consultation Process with English River First Nation for the Remaining Steps of the Regulatory Review Process of the Wheeler River Project

1. Introduction

These proposed next steps in the consultation process, which started in 2019, are intended to guide federal Crown (led by the CNSC) consultation activities with English River First Nation (ERFN) during the remaining steps of the regulatory review process of the Wheeler River Project (the Project). They communicate CNSC's objectives for consultation, the proposed structure for integrating consultation into the regulatory review process, and the proposed activities in which the CNSC and ERFN can work together to address ERFN's concerns regarding the Project. This document is intended to be a "living document" that can be updated as necessary during the regulatory review process, as a result of ongoing discussions between CNSC and ERFN.

2. CNSC's Consultation Objectives

- To continue the establishment of a positive and productive working relationship with ERFN during the remaining steps of the regulatory review process.
- To communicate with ERFN about the Project and developments during the regulatory review process in a timely manner.
- To establish how ERFN would like to be consulted during the remaining steps of the regulatory review process and establish a flexible and responsive consultation approach.
- To work with ERFN to continue to:
 1. identify any potential environmental effects of the Project, including those on current use of lands and resources for traditional purposes, health and socio-economic conditions, and heritage resources
 2. identify adverse impacts of the Project on your community's potential or established rights
 3. ensure options for avoiding, mitigating, or accommodating adverse impacts are considered
- To work with ERFN and the proponent to respond to specific questions and requests regarding issues raised related to the Project.
- To listen to and understand the concerns raised, and consider the feedback, perspectives, and issues raised by ERFN in order to inform decision-making.
- To collaborate with ERFN and the proponent to identify any potential commitments, mitigations, accommodations and conditions to address ERFN's concerns regarding any potential impacts on ERFN's rights and interests as a result of the proposed project.

3. Integrating Consultation into the Regulatory Review Process

Table 1 provides a description of the main remaining steps in the regulatory review process and a description of how the CNSC proposes to integrate consultation activities into those steps. This table describes what ERFN should receive, have access to, or expect from the CNSC, on behalf of the federal Crown, and what ERFN could share and provide to the regulatory review process.

Table 1: Integrating Consultation into the Remaining Steps of the Regulatory Review Process¹

Regulatory Review Step²	Description of Activities³	What ERFN should receive, have access to, or expect from the federal Crown	Information ERFN may want to consider providing to the federal Crown, and ways ERFN may want to participate
Project Description Review and Scoping Decision <i>(Completed in 2019-20)</i>	<ul style="list-style-type: none"> • Opportunity for ERFN to provide comments on the Project Description – Completed 	<ul style="list-style-type: none"> • CNSC notification to ERFN of the project and project description review process – Completed • PFP offering – Completed • Early information sharing and offers of consultation meetings – Completed 	<ul style="list-style-type: none"> • Provide comments on the project description – Completed

¹ Adapted from a template developed by the Canadian Environmental Assessment Agency (CEAA) (CEAA references the BC First Nations Environmental Assessment Technical Working Group Toolkit Workshop as a basis for this document).

² Any updates to dates related to the regulatory review process will be communicated to ERFN.

³ Denison's activities during this step of the regulatory review process are not specifically steps of the regulatory review process, but these are expectations of Denison, by CNSC staff.

Regulatory Review Step ²	Description of Activities ³	What ERFN should receive, have access to, or expect from the federal Crown	Information ERFN may want to consider providing to the federal Crown, and ways ERFN may want to participate
Environmental Impact Statement (EIS) Review <i>(Initiated 2022 – complete as of December 24, 2024)</i>	<ul style="list-style-type: none"> • Opportunity for ERFN to provide comments on draft EIS - Completed • Denison to revise documentation to address comments and concerns raised by ERFN. - Completed • Denison expected to discuss with ERFN how their comments and concerns have been addressed. - Completed 	<ul style="list-style-type: none"> • Opportunity to provide feedback to the Crown on adequacy of Denison's responses to ERFN's comments and concerns. - Completed • Opportunity to participate in technical discussions with CNSC staff regarding ERFN's outstanding comments and concerns, as well as other discussions as necessary (e.g. teleconferences and/or meetings with Chief and Council, community open houses). - Completed • Opportunity to discuss how to integrate Traditional Knowledge and Land Use (TKLUS) information into the remaining steps of the regulatory review process. - Completed • Opportunity for direct and continued discussions between ERFN and the CNSC. - Completed 	<ul style="list-style-type: none"> • Provide ERFN's views on the accuracy of Denison's information about issues ERFN have raised and on any proposed ways of addressing those impacts. - Completed • Provide feedback on the adequacy of Denison's responses to ERFN's comments and concerns. - Completed • Participate in technical discussions with CNSC staff to address ERFN's outstanding comments and concerns. - Completed

Regulatory Review Step ²	Description of Activities ³	What ERFN should receive, have access to, or expect from the federal Crown	Information ERFN may want to consider providing to the federal Crown, and ways ERFN may want to participate
<p>Development of draft Consultation Report</p> <p><i>(Current phase – 2025)</i></p>	<ul style="list-style-type: none"> The CNSC's Consultation Report includes a summary of consultation with Indigenous Nations and communities, potential impacts to potential or established rights of Indigenous Nations and communities, views and concerns expressed by Indigenous Nations and communities and the CNSC's response to those concerns, including potential mitigation and accommodation measures and commitments and conditions to address those concerns. The CNSC's goal is to work towards a consensus on the key issues and concerns in relation to the proposed project with ERFN. 	<ul style="list-style-type: none"> Opportunity to collaboratively develop sections of the draft Consultation Report specific to ERFN such as Indigenous Knowledge and Land Use information, potential impacts of the Project on ERFN's rights and interests and concerns expressed. <ul style="list-style-type: none"> A collaborative drafting process refers to CNSC staff writing the draft sections and providing to ERFN for review and comment for consideration and/or inclusion. The objective is to obtain mutually agreed upon text, between CNSC staff and ERFN (as noted in the next step, where ERFN has diverging views with CNSC staff's analysis and findings, these will be reflected in the Consultation Report, and we also invite ERFN to capture this information in their written and/or oral intervention to the Commission). 	<ul style="list-style-type: none"> Review and provide comment on sections of the Consultation Report specific to ERFN.

<p>EA Report, Consultation Report and Licensing CMD Review</p> <p>AND</p> <p>Commission Public Hearings</p> <p><i>(Hearing date 2025 –2026 TBD)</i></p>	<ul style="list-style-type: none"> • The EA Report presents the CNSC staff’s evaluation on the findings of the EA, including conclusions and recommendations regarding the adverse environmental effects that are likely to result from the project, appropriate measures that would mitigate those effects, the significance of residual effects after implementation of the mitigation measures, as well as the components of the follow-up and monitoring program. • CNSC staff will submit and make publicly available, for review, the draft EA Report, Consultation Report and licensing CMD in advance of public hearings (timing to be determined by CNSC Registry). • The licensing CMD presents CNSC staff’s findings, recommendations and conclusions from the technical review of Denison’s licence application and supporting documentation. • The Commission will hold public hearings with opportunities for public and Indigenous Nations and communities to submit oral and/or written interventions. CNSC staff and the Registry are open to working with ERFN to ensure that the Commission hearings include and reflect ERFN’s cultural protocols and processes. 	<ul style="list-style-type: none"> • Opportunity to review the Final EA Report, Consultation Report and licensing CMD to inform oral and/or written interventions. 	<ul style="list-style-type: none"> • Present ERFN’s views to the Commission by providing information orally and/or in writing. • It is recommended that any diverging views with CNSC staff’s analysis and findings in CNSC’s reports be captured in ERFN’s written and/or oral intervention to the Commission, if required.
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Regulatory Review Step ²	Description of Activities ³	What ERFN should receive, have access to, or expect from the federal Crown	Information ERFN may want to consider providing to the federal Crown, and ways ERFN may want to participate
<p>Commission's EA and Licensing Decisions</p> <p><i>(Future phase – TBD)</i></p>	<ul style="list-style-type: none"> The Commission considers the EA Report, Consultation Report and CMD and interventions from the public and Indigenous Nations and communities and determines whether, taking into account the mitigation measures, conditions, accommodations and commitments proposed, the Project is likely to cause significant adverse environmental effects and if the duty to consult and accommodate was met. Should the Commission issue an EA decision statement allowing the Project to proceed, the Commission will also include legally binding conditions with which Denison must comply to implement appropriate mitigation measures and a follow-up and monitoring program. 	<ul style="list-style-type: none"> Notification and sharing of the Commission's Detailed Record of Decisions (EA and licensing). Meetings with ERFN to discuss the Commission's decision and next steps for ongoing engagement and collaboration. 	<ul style="list-style-type: none"> Feedback on preferred approach to ongoing engagement, information sharing, oversight, monitoring, reporting and collaboration.

From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Way, Jessica](#); [Froess, Ryan](#); [alfred.dawatsare@erfn.net](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [bnatomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#); [Dennis Sherratt](#); [jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [Noakes, Rain](#); [McKeown, Justin](#); [Boser, Sydney](#); [Chani Campbell](#); [Janna Switzer](#); [Brianne England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#); [alfred.dawatsare@erfn.net](#); [Brianne England](#); [Kwamena, Nana-Owusua](#); [aj wilson](#);
Bcc:
Subject: CNSC Wheeler River February 2025 EA Update - Participant Funding Opportunity
Sent: 2025-02-03 3:50:00 PM

Hi Everyone,

The Canadian Nuclear Safety Commission (CNSC) is offering participant funding to assist Indigenous Nations and communities, members of the public and interested parties in reviewing the environmental assessment (EA) and licence application for Denison's Wheeler River Project and in participating in a future Commission hearing process. Here is the participant funding notice, with the details on how to apply: [Participant funding for Denison's Wheeler River Project](#)

This participant funding opportunity is open from February 3 to April 4, 2025.

Additional information about the Wheeler River EA process can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team
Email: WheelerRiver@cnsccsn.gc.ca
Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

From: [Boser, Sydney](#)
To: [Cheyenna Hunt](#)
Cc: [Angie Campbell](#); [Way, Jessica](#); [Froess, Ryan](#);
Subject: CNSC & ERFN Meeting Notes - Feb 4th 2025
Attachments: [Wheeler_River_-_Rights_Impact_Assessment_Framework_Presentation - ERFN Feb 2025.pdf](#)
Sent: 2025-02-11 11:12:00 AM

Hi Cheyenna,

Please see below the notes from our monthly meeting as well as the presentation that Ryan gave attached. We will be in touch in the coming weeks on beginning the RIA – hope you have a great week!

-

CNSC & ERFN Monthly Meeting – Feb 4th 2:30pm-3:30pm

Participants: Ryan Froess, Sydney Boser, Jes Way, Rain Noakes, Torin Takala, Cheyenna Hunt

Denison Project Update:

- CNSC completed the final EIS review and accepted the final EIS on December 24th
- CNSC will be shifting focus to the environmental assessment report (EA report) and will be drafting that including the commission member document (CMD) and the consultation report. The RIA will be included as part of the EA report which CNSC will work with ERFN on.
- CNSC doesn't have timing yet as it is currently with Registry to make those decisions but are looking at Part 1 of the hearing being in the fall and Part 2 following that
- Part 1 is CNSC and Denison presentation and then Part 2 is where Nations would intervene
- PFP funding is now available to apply for to receive funding for this process. The deadline to apply is April 4th
- CNSC is still working on the Denison licensing review
- CNSC is wanting to do more outreach in the communities for the Denison project in the Spring sometime but will keep ERFN updated on that

RIA Discussion:

- Ryan presented on the RIA and next steps in the process
- Our next few meetings with ERFN will focus on the RIA as CNSC will need support from ERFN on those discussions and review of the information included; we may need to increase the frequency of these meetings (every two weeks possibly)

Other Funding topics:

- The funding for Angie's position expires later this year and ERFN will need to reapply under Stream 1 when it becomes available this Spring. CNSC will keep ERFN updated when the funding is live.
- If ERFN need additional funding for the RIA work, this could be considered as part of Wheeler River TOR funding – Cheyenna will take a look at how much funding they have remaining for the EA process

Actions:

- Send presentation to ERFN on the RIA that was presented (complete)
- CNSC to begin drafting RIA specific to ERFN and share with them for review when ready
- Cheyenna to review remaining EA funding and let CNSC know if additional funding is needed for RIA work

Cheers,

Sydney Boser née Nickolet (she/her/elle)

Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnsccsn.gc.ca
Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties
intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnsccsn.gc.ca

*I acknowledge that the land on which I live and work is the traditional Treaty 6
Territory and Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel
du Traité 6 et la patrie des Métis*



VIA EMAIL

e-Doc 7465624 (Word)

e-Doc 7465626 (PDF)

February 24, 2025

Alfred Dawatsare
Chief of English River First Nation
301-2555 Grasswood Road
Saskatoon, SK S7T 0K1

Sean Willy
President and CEO of Des Nedhe Group
301-2555 Grasswood Road
Saskatoon, SK S7T 0K1

Dear Chief Dawatsare and Sean Willy,

Re: Timeline for the Wheeler River Project

I write in response to your letter of January 17, 2025, written to President Tremblay and Executive Vice-President and Chief Regulatory Operations Officer Jammal regarding the timing for Commission proceedings in relation to the Wheeler River Project.

I am the Commission Registrar. Part of my role is to manage the Commission's public proceedings and, in relation to those proceedings, it is the Commission Registry through which all hearing-related questions are directed. This is to ensure a fair and transparent process. It is also the reason I am replying to the elements of your letter relating to a future public hearing.

Please be assured that your letter has been considered in the planning for the upcoming public hearing in this matter, alongside several other factors in order to ensure the informal and expeditious proceedings that are mandated by subsection 20(3) of the *Nuclear Safety and Control Act*.

In addition to considering your and other letters, the Registry has received recommendations for hearing dates from CNSC staff and has met with Denison Mines representatives on this issue. Hearing dates are being confirmed and will be announced in the coming days.

I thank you for your request for an expeditious hearing, and for the perspectives you have provided. I look forward to further communication as we plan for this proceeding.

Please do not hesitate to reach out if you have any further questions.

Sincerely,



Candace Salmon

Commission Registrar
Legal and Commission Affairs Branch
Canadian Nuclear Safety Commission
candace.salmon@cnsccsn.gc.ca / cell: (343) 630-3471

Registraire de la Commission
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cc. Pierre Tremblay – pierre.tremblay@cnsccsn.gc.ca
Ramzi Jammal – ramzi.jammal@cnsccsn.gc.ca
Cheyenna Hunt - cheyenna.hunt@desnedhe.com

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Boser, Sydney](#); [Way, Jessica](#); [alfred.dawatsare@erfn.net](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [bнатомagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeaty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#); [Dennis Sherratt](#); [jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [Noakes, Rain](#); [McKeown, Justin](#); [Boser, Sydney](#); [Chani Campbell](#); [Janna Switzer](#); [Brienne England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#); [alfred.dawatsare@erfn.net](#); [Brienne England](#); [Kwamena, Nana-Owusua](#); [aj wilson](#); [Duhaime, Brenda](#); [Trieneke Gastmeier](#); [Ryan Smith](#); [Keegan McGrath](#);

Bcc:

Subject: CNSC Wheeler River March 2025 EA Update - Hearing Dates and Participant Funding

Sent: 2025-03-06 8:24:00 PM

Hi Everyone,

On February 27, 2025, the Canadian Nuclear Safety Commission (CNSC) announced hearing dates for a public hearing on Denison Mines Corporation's licence application to prepare a site for and construct its Wheeler River mine and mill project. The hearing will also consider the Environmental Assessment, which is being conducted under the *Canadian Environmental Assessment Act*, 2012.

The two part hearing will be held as follows:

Part 1:

- Date: October 8, 2025
- Place: To be determined (National Capital Region and/or virtually via zoom)
- Time: As set by the agenda to be published prior to the hearing date

Part 2:

- Date: Week of December 8, 2025
- Place: To be determined (Saskatoon)
- Time: As set by the agenda to be published prior to the hearing date

More information can be found in the CNSC's public notice here: <https://api.cnscccsn.gc.ca/dms/digital-medias/Notice-of-Public-Hearing-and-Participant-Funding-2025-H-09.pdf/object>

Also, a reminder if you are planning to apply, **participant funding applications are due on April 4, 2025.**

Additional information about the Wheeler River EA process can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnscccsn.gc.ca

Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#)

Boser, Sydney

Subject: In Person Meeting - ERFN/CNSC - Denison Wheeler River Project
Location: Microsoft Teams Meeting

Start: Tue 2025-03-25 11:00 AM
End: Tue 2025-03-25 1:00 PM

Recurrence: Weekly
Recurrence Pattern: every 3 week(s) on Tuesday from 4:00 PM to 5:30 PM

Meeting Status: Accepted

Organizer: Way, Jessica
Required Attendees: Cheyenna Hunt; angie.campbell@desnedhe.com; Boser, Sydney; Froess, Ryan
Optional Attendees: Gorzkowski, Konrad; Noakes, Rain

Categories: Denison Wheeler River

Hi All,

It may not be possible to have this as a teams meeting, so I have removed the virtual option.

Standing Agenda:

- Status updates:
 - ERFN to provide an update on work with Denison (and anything else)
 - CNSC to provide updates on project / hearing / drafting of consultation and EA Reports
- Discussions on any topics where information / input is needed from ERFN and reviews of report content
- Any other topics
- Next steps / meeting agenda

We will follow-up with the meeting minutes and any action items from our meetings.

Thanks,
Jes

From: [Way, Jessica](#)
To: Cheyenna Hunt
Cc: [angie.campbell@desnedhe.com](#); [Noakes, Rain](#); [Boser, Sydney](#); [McKeown, Justin](#); [Way, Jessica](#);
Subject: FW: CNSC & ERFN Documents for Review - Denison Wheeler River: Consultation Report and EERRs
Attachments: [ERFN Consultation Report Section 4.1 - For Review.docx](#); [E-DOCS-#7508609-v3-2025-04-25-ERFN_EA_Content_For_Review.DOCX](#);
Sent: 2025-04-30 10:24:18 AM

Hi Chey,

Apologies for any confusion, but there are a couple of edits in the EA Report content. I realized that I missed a couple of things when compiling, please see edits in track changes.

Thanks,
Jes

From: Boser, Sydney <sydney.boser@cnscccsn.gc.ca>
Sent: Friday, April 25, 2025 5:17 PM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: Angie Campbell <Angie.Campbell@desnedhe.com>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>
Subject: CNSC & ERFN Documents for Review - Denison Wheeler River: Consultation Report and EERRs

Good afternoon Cheyenna,

As discussed previously, please see attached the information for your review. There are two documents attached which are the following:

1. Section 4.1 of the Consultation Report which outlines our consultation activities since the beginning of the Wheeler River project in 2019. This also includes background information on ERFN, a table summary of key consultation activities to date, a summary of concerns raised to date and CNSC staff's response. This information will be publicly accessible, once published.
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Please review both documents for **accuracy** and return to us no later than **May 23rd, 2025**. Please note that if we do not receive comments by the deadline then this information will be included without ERFN's feedback. If you have any questions, please reach out to myself or Jes Way or we can discuss further at our meeting on May 13th.

Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnscccsn.gc.ca

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Je reconnais que les terres sur lesquelles je vis et travaille sont le territoire traditionnel du Traité no 6 et la patrie des Métis*

From: [Noakes, Rain](#)
To: cheyenna.hunt@desnedhe.com; angie.campbell@desnedhe.com;
Cc: [Way, Jessica](#); [Boser, Sydney](#); [McKeown, Justin](#); [Gorzowski, Konrad](#);
Subject: CNSC/ERFN Meeting Minutes - April 25
Sent: 2025-05-02 3:34:00 PM

Hello,

Please see below for the minutes from our meeting on April 25, 2025. Do not hesitate to let us know if you would like to make any edits.

Cheers,

Rain

Meeting Minutes: Wheeler River - CNSC and ERFN

Date: April 25, 2025

Location: Microsoft Teams

Attendees: CNSC (Jes Way, Sydney Boser, Justin McKeown, Konrad Gorzowski, Rain Noakes), English River First Nation (Cheyenna Hunt)

1. Concerns regarding CNSC Consultation Process

- ERFN raised questions regarding the CNSC process for evaluating Indigenous Nations rights and title claims in proposed project areas. CNSC went on to explain that they are not a rights-determining body and that claims must be supported with examples of land-use or evidence of potential impact to Indigenous and/or Treaty rights in the area when evaluating the level of consultation or engagement that's required.
- CNSC encouraged ERFN to raise these consultation-related concerns with the Commission. The option of having a "closed-door" session with Commission to present confidential information was raised. Sydney has already mentioned to the Registry that ERFN is interested in this option and encourage ERFN to reach out to the Registry to discuss further.

2. Consultation and EA Report Review

- ERFN is to receive the Consultation Report from CNSC on April 25; This section will include consultation activities that have taken place between CNSC and ERFN.
- Along with the consultation report, ERFN will receive excerpts from the EA report. These "Views Expressed" will be included in chapters 6 to 8 of the EA report, reflecting the issues and concerns raised by ERFN throughout the process (at a high level), on environmental topic areas and valued components.
- ERFN is to review for accuracy and expected to complete their review by May 23.

3. Meeting Schedule

- Justin McKeown will be in Saskatoon on May 27 to meet at the ERFN office for our next TOR meeting.
- A meeting invite will be sent out for the upcoming TOR meeting.

4. ACTIONS:

- a. CNSC to send out Consultation and EA report sections for ERFN to review (**complete**)
- b. CNSC to share Registry contact info with ERFN (**complete**)
- c. CNSC to send out TOR meeting invite for May 27th (**complete**)
- d. ERFN to complete review by May 23rd

Rain Forest Noakes, MEnv

(he / him / il)

Environmental Review Officer | Agent en examen de l'environnement
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Rain.Noakes@cnsccsn.cg.ca | Tel: (778) 687-1324

My work hours might not be the same as your work hours – please reply at your convenience.

From: [Cheyenna Hunt](#)
To: [Way, Jessica](#); [Boser, Sydney](#);
Subject: Fw: CNSC & ERFN Documents for Review - Denison Wheeler River:
Consultation Report and EERRs
Sent: 2025-05-20 4:27:17 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

Cheyenna Hunt B.A., LL.B.
Director, Lands & Consultation
English River First Nation

301-2555 Grasswood Road E
Saskatoon, Sk S7T0K1

306.291.6808
cheyenna.hunt@desnedhe.com

From: Robin Kusch <robin_kusch@hotmail.com>
Sent: Tuesday, May 20, 2025 7:25:11 PM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Subject: Re: CNSC & ERFN Documents for Review - Denison Wheeler River: Consultation Report and EERRs

Good day Chey,

Sorry for the delay; I reviewed the E-DOCS-#7508609-v3-2025-04-25-ERFN_EA_Content_For_Review.docx and the summary of the views expressed is well developed, thorough and based on the full set of documents submitted by ERFN, including the Draft Environmental Impact Statement Technical Review Community Wellness and Rights (Shared Value Solutions 2022). I do not have any edits to request. The ongoing monitoring indicated by CNSC regarding engagement between Denison and First Nations also aligns with ERFN's expectations.

Cheers,
Robin

From: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Sent: May 13, 2025 11:02 AM
To: Robin Kusch <robin_kusch@hotmail.com>
Subject: Fw: CNSC & ERFN Documents for Review - Denison Wheeler River: Consultation Report and EERRs

Can you review this for me please? Need to know if it is accurate. I have left it to today's date and need to have a response sent to CNSC by May 23rd (sorry). As always please submit your costs to me for the work done.

Chey

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Wednesday, April 30, 2025 8:23 AM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: Angie Campbell <Angie.Campbell@desnedhe.com>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; Boser, Sydney <sydney.boser@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: FW: CNSC & ERFN Documents for Review - Denison Wheeler River: Consultation Report and EERRs

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Jes

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Sent: Friday, April 25, 2025 5:17 PM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: Angie Campbell <Angie.Campbell@desnedhe.com>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>
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Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnsccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des
Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnsccsn.gc.ca

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and Homeland of the Métis*

Je reconnais que les terres sur lesquelles je vis et travaille sont le territoire traditionnel du
Traité no 6 et la patrie des Métis

From: [Way, Jessica](#)
To: Cheyenna Hunt
Cc: [Boser, Sydney](#); [Noakes, Rain](#); [McKeown, Justin](#); [Angie Campbell](#);
Subject: RE: For ERFN Review - Excerpt from EA report
Sent: 2025-05-30 5:11:29 PM

Awesome, thanks for getting back to me so quickly!

Jes

From: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Sent: Friday, May 30, 2025 7:06 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Boser, Sydney <sydney.boser@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Angie Campbell <angie.campbell@desnedhe.com>
Subject: Re: For ERFN Review - Excerpt from EA report

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE
--

Jes this is all accurate information. I would not make edits.

Cheyenna

Cheyenna Hunt B.A., LL.B.
Director, Lands & Consultation
English River First Nation

301-2555 Grasswood Road E
Saskatoon, Sk S7T0K1

306.291.6808
cheyenna.hunt@desnedhe.com

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Friday, May 30, 2025 4:58:55 PM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: Boser, Sydney <sydney.boser@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Angie Campbell <angie.campbell@desnedhe.com>
Subject: For ERFN Review - Excerpt from EA report

Hi Chey,

As we have been reviewing and pulling together the final elements of the EA Report, and some additional text was identified that we'd like to have ERFN review. This is information included in the *Indigenous uses: Current use of lands and resources for traditional purposes* Section of the EA report.

English River First Nation

The Project is located within the Ancestral Lands of ERFN that stretch from the Churchill River in south to Wapata Lake in northeastern Saskatchewan. The Traditional Knowledge and Indigenous Knowledge (TK/IK) that is contained within Denison's EIS was also shared with the CNSC by ERFN for the purposes of the EA process [REF].

This information indicates that the LSA and RSA are important hunting areas for large game such as moose and gathering areas for berries and medicinal plants. ERFN maintains a culture camp in the RSA at kilometre 160 of Highway #914, approximately 100 km south of the project where the highway crosses the Haultain river. ERFN land users gather at the culture camp several times a year with Elders and youth to carry out land use activities such as berry picking, fishing, moose hunting, cultural teachings, and other activities. Moose hunting locations and woodland caribou harvesting sites were mapped along the Wheeler River mine site access road and adjacent to the Key Lake highway corridor in the LSA and RSA. The heaviest concentration of contemporary harvesting by ERFN in the region is between the Haultain lake reserve lands and the McArthur River mine, on both sides of the Key Lake highway located within LSA/RSA. Closer to the Project site, ERFN TK study participants identified fishing locations in the LSA at Russell Lake and in the smaller lakes and creeks close to the Project site. Plant and berry harvesting areas were also mapped in the LSA around the Fox Lake Road close to the proposed Project site and near the Wheeler River bridge. ERFN also documented a multi-generational history of trapping in the RSA east of the proposed Project, and these same trails are now used currently for subsistence hunting. ERFN reported that lynx, muskrat, fisher, fox, otter, and mink were trapped in the RSA within the last 10 years. ERFN also mapped 61 cultural sites overall in the region, with 10 of those occurring within the LSA. Cultural sites mapped included a birth site, historic family village sites, historically significant sites, ERFN recreation areas, and other sites culturally significant travel routes to ERFN.

Sorry to be sending along more content after the fact, but this section came together a bit later. If you could please let us know if you have any edits before June 13th, I'd appreciate it. It's a pretty short excerpt, so I hope that two weeks is enough time to review.

Have a wonderful weekend.

Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.

From: [Noakes, Rain](#)
To: Cheyenna Hunt
Cc: [Way, Jessica](#); [Boser, Sydney](#);
Subject: Call for Edits - Wheeler River - June 17
Sent: 2025-06-27 1:42:59 PM

Hi Cheyenna,

Please see below for the draft minutes from our meeting on June 17th. As always, do not hesitate to reach with any questions or concerns.

Cheers,

Rain

Meeting Minutes: CNSC-ERFN Engagement on Denison Wheeler River Project

Date: June 17, 2025

Location: Virtual Meeting on MS Teams

Participants:

- **ERFN Representatives:** Cheyenna Hunt
 - **CNSC Representatives:** Sydney Boser, Jes Way, Rain Noakes
-

Project Updates and Next Steps

a. Consultation Report

- CNSC confirmed the consultation report is in final internal review.
- The Issues and Concerns Table will be sent to ERFN by the end of next week (by June 27) and will be given until mid-end July for review and comment.
- ERFN will review and provide feedback before the report is finalized.
- The Rights Impact Assessment (RIA) will begin after the consultation report is finalized and will be developed collaboratively. CNSC will begin a draft and share back and forth with ERFN until finalized.

b. Timeline and Coordination

- ERFN and CNSC agreed to align timelines:
 - Issues and Concerns Table due back around July 22–23.
 - RIA drafting to begin after that, with CNSC and ERFN working iteratively.
- CNSC confirmed that the consultation report and RIA will support the Part 1 and Part 2 Commission hearings, respectively.

Funding and Work Planning

a. Participant Funding Program (PFP)

- ERFN confirmed receipt of PFP funding for the Denison hearing

b. Terms of Reference (ToR) and Work Plan

- ERFN's ToR and work plan were extended to September 30, 2025. CNSC and ERFN will need to work together to develop a new workplan and funding application to continue the TOR past end of September.
- Three meetings have been held under the current ToR:
 - September 19, 2024
 - October 17, 2024
 - May 27, 2025

- One more meeting is planned (July 9, 2025) to complete the current ToR cycle.

C. Remaining Budget

- Approximately \$3,000 remains under the current ToR.
- Funds will be used for the July 9 meeting, which will also serve as a listening tour session.
- If additional funds are needed, CNSC will coordinate with the funding team to top up.

Stream 1 and Stream 3 Funding

a. Stream 1

- ERFN has already applied for the full amount under Stream 1.
- Clarification provided regarding a consultant who attempted to apply on ERFN's behalf without authorization.
- CNSC will disregard any duplicate applications and confirmed ERFN's application is valid and complete.

b. Stream 3

- ERFN expressed interest in hosting a decommissioning workshop.
- CNSC confirmed this would fall under Stream 3 and can be applied for at any time.
- ERFN to follow up with a proposal for the workshop.

NexGen Compliance Concerns

- ERFN raised concerns about NexGen's administrative monetary penalty (AMP) related to unauthorized drilling at the Rook I site.
- Concerns included:
 - Lack of transparency from NexGen.
 - Perception of regulatory non-compliance.
 - Potential erosion of trust with Indigenous communities.

Upcoming Meetings

- July 9: Listening tour and ToR meeting.
- July 23: Monthly ERFN–CNSC meeting (rescheduled from July 8 and 29).
 - Will focus on reviewing the Issues and Concerns Table.

Action Items and Follow-Ups

Action Item	Responsible	Timeline
Send Issues and Concerns Table to ERFN	CNSC (Sydney)	By June 27, 2025
Review and return Issues and Concerns Table	ERFN	By July 22–23, 2025
Begin Rights Impact Assessment drafting	CNSC & ERFN	Late July 2025
Host Listening Tour / ToR Meeting	ERFN & CNSC	July 9, 2025
Submit Stream 3 application for decommissioning workshop	ERFN	TBD
Respond to consultant (Marlene) regarding Stream 1	CNSC	Complete
Reschedule monthly meeting to July 23	CNSC & ERFN	Confirmed

Rain Forest Noakes, MEnv

(he / him / il)

Environmental Review Officer | Agent en examen de l'environnement

Environmental Review Division | Division de l'examen de l'environnement

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Rain.Noakes@cnsccsn.gc.ca | Tel: (778) 687-1324

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From: [Boser, Sydney](#)
To: [Cheyenna Hunt](#)
Cc: [McKeown, Justin](#); [Way, Jessica](#); [Noakes, Rain](#); [Angie Campbell](#);
Subject: CNSC & ERFN - Issues Tracking Table - For Review: Wheeler River
Attachments: [ERFN Issues Tracking Table Appendix A.1 - For Review.docx](#)
Sent: 2025-06-27 2:24:00 PM

Good afternoon Chey,

Please see attached the ERFN's issues tracking table for the Denison Wheeler River Project for your review. This tracking table includes concerns that ERFN has raised throughout the EA process for the Project and includes CNSC's response. This table will be appended to the Consultation Report for the Project in advance of the Part 1 hearing.

Please review the document for **accuracy** and return to us no later than **July 23rd, 2025**. Please note that if we do not receive comments by the deadline then this information will be included without ERFN's feedback. If you have any questions, please reach out to myself or Rain Noakes and we can discuss further at our meeting on the 23rd.

Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
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Phone Number: 343-596-9556

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From: [Cheyenna Hunt](#)
To: [Boser, Sydney](#)
Cc: [McKeown, Justin](#); [Way, Jessica](#); [Noakes, Rain](#); [Angie Campbell](#);
Subject: RE: CNSC & ERFN - Issues Tracking Table - For Review: Wheeler River
Sent: 2025-07-22 11:39:00 AM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

Hi Sydney.

I have reviewed the Issues Tracking table. The comments are accurate as to the contents of the ERFN issues and Concerns that are listed.

Cheyenna

From: Boser, Sydney <sydney.boser@cnscccsn.gc.ca>
Sent: July 17, 2025 3:29 PM
To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; Angie Campbell <angie.campbell@desnedhe.com>
Subject: RE: CNSC & ERFN - Issues Tracking Table - For Review: Wheeler River

Good afternoon Chey,

I just wanted to send a reminder that the deadline to provide feedback on the issues tracking table is Wednesday July 23rd. I know we have our next meeting on July 23rd so we can discuss more then if needed!

Thank you,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
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To: Cheyenna Hunt <cheyenna.hunt@desnedhe.com>
Cc: McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; Angie Campbell <angie.campbell@desnedhe.com>
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B.3 Key Correspondence with Kineepik Métis Local

See Appendix B.5 for correspondence with KML between 2019-2021 as CNSC was consulting directly with MN-S during this time

From: [Walter Smith](#)
To: [Froess, Ryan](#)
Cc: [Interventions / Interventions \(CNSC/CCSN\)](#); [Alex Ross](#); [Mike Natomagan](#); [Billie Jo Natomagan](#);
Subject: Removal of Delegation
Attachments: [Denison Wheeler River Project - Formal Letter.pdf](#); [Denison Wheeler River Project.pdf](#);
Sent: 2021-11-24 7:49:05 AM

Follow Up Flag: Follow up

Flag Status: Flagged

Good morning, Ryan, please find attached a formal letter indicating that we are removing all delegations previously assigned for Kineepik Metis Local(KML) in relations to the Denison Mines. For clarity KML will manage all Duty to Consult processes for projects that occur on and adjacent to our mapped territory.

Additionally, we would like to request a meeting with the CNSC to learn about increasing Uranium project activity that may affect our protected rights. We would be pleased to host a meeting for CNSC about the efforts we have developed in communicating with our traditional land users and our community members including sharing our digitally mapped territory.

We are also curious on what specific conversations are occurring within the CNSC since Canada has signed UNDRIP.

Sent from [Mail](#) for Windows



Kineepik Metis Local

Friday, November 12, 2021

Government of Saskatchewan
Director, Aboriginal Consultation Unit
Lands and Consultation Branch
220 - 1855 Victoria Avenue
REGINA, SK S4P 3T2
Toll free: 1-877-879-7099
Email: Aboriginal.Consultation@gov.sk.ca

To Whom it May Concern:

Please consider this letter as formal notification effective immediately that Kineepik Metis Local #9 (KML) will manage all aspects of the Duty to Consult and Accommodation process for the Denison Mines, Wheeler River Project. All previous delegations are now removed.

Sincerely,

Mike Natomagan
President, Kineepik Metis Local #9

cc: Alex Ross, Executive Director KML
Glen McCallum, MNS President
David D. Cates President & CEO

Box 166 • Pinehouse Lake, SK • S0J 2B0 • Canada
Phone 306 884 2016 • Fax 306 884 2365



Kineepik Metis Local #9
Box 166
Pinehouse Lake, SK
S0J 2B0

Monday, November 15, 2021

DENISON MINES CORP.
230-22nd Street East, Suite 200
Saskatoon, SK
Canada, S7K 0E9

Dear Carolanne Inglis-McQuay

As you are aware, Kineepik Metis Local formally notified the Aboriginal Consultation Unit and the Metis Nation of Saskatchewan, effective Friday November 12, 2021, that Kineepik Metis local #9 is the sole representative for all Duty to Consult and Accommodation processes for the Indigenous community of Pinehouse. We have informed David Cates, President and CEO of Denison Mines of this immediate change. We are pleased once again to engage with Denison Mines, as a right bearing Indigenous community with proven connection to the land around Wheeler River project.

As such we are requesting a series of meetings to start negotiating towards an agreement. With the first set of meetings to obtain current information on the Wheeler River Project. Kineepik is also requesting material information that can be shared, while we were under the Delegation of Authority.

We looked forward to *a shared prosperity* for all work activities on the Wheeler River project. We are also looking forward to establishing a formal relationship with a Collaboration Agreement as we have with Cameco and Orano.

Sincerely,

Mike Natomagan
President, Kineepik Metis Local #9

Alex Ross
Alex Ross, Kineepik Metis Local #9

From: [Froess, Ryan](#)
To: [Walter Smith](#); [Billie Jo Natomagan](#); [Mike Natomagan](#);
Cc: [Adam Levine \(adam.levine@cnscccsn.gc.ca\)](#); [Phaneuf, Marcelle](#); Mossop, Veronica;
Subject: Kineepik Metis Local - CNSC Meeting - Denison Mines (Follow-up)
Attachments: [Dension EA Stage Document_Dec 2021.docx](#)
Sent: 2021-12-10 1:50:00 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon Walter,

It was really great connecting early this week and learning more about the Kineepik Métis Local (KML) and your interest in the Denison's Wheeler River project. We also would like to thank you for sharing some of your digital Traditional Land Use maps with us. As an Indigenous community with interest in this project, the CNSC is very interested and meeting with KML on the Denison Wheeler River Project moving forward and learning more about your community. I have provided some links to the CNSC website as well as some additional links to the Proposed Wheeler River Project that might be of interest to KML.

[Wheeler River Project - Canadian Nuclear Safety Commission](#)
[Wheeler River Project - Canada.ca \(ceaa-acee.gc.ca\)](#)
[Get involved in an environmental assessment - Canadian Nuclear Safety Commission \(cnscccsn.gc.ca\)](#)
[Indigenous consultation, engagement and reconciliation - Canadian Nuclear Safety Commission \(cnscccsn.gc.ca\)](#)

The CNSC will be making funding available to support Indigenous and Public participation throughout the EA process through the CNSC's Participant Funding Program (PFP). The first phase of PFP, for the review of the Draft EIS, should be announced early 2022. We will keep you updated on when the PFP notice is open and made available. If you would like to you can also sign up for and receive email notifications here: [Subscribe - Canadian Nuclear Safety Commission \(cnscccsn.gc.ca\)](#).

The CNSC is interested in meeting in January to continue our discussions on next steps and share more information on how the CNSC and KML can collaborate to involve your community and the EA process and advance our understanding of KML rights and interests. I had a quick look at my colleagues schedules and I would suggest the following dates upcoming in January. Let me know if any work and perhaps you and I can work on developing an agenda based on KML's interests for our next meeting.

January 10th – 10:00 am to 11:00 am
January 13th – 10:00 am -11:00 am or 2:30 – 3:30 pm
January 14th – 1:00 pm to 2:00 pm

If you have any questions in the meantime please do not hesitate to contact myself or the Environmental Specialist Marcelle Phaneuf.

Thanks,

Ryan Froess
Senior Policy Advisor, Policy, Aboriginal, and International Relations Division
Canadian Nuclear Safety Commission
ryan.froess@canada.ca | Cell: 306-914-7892

Marcelle Phaneuf, M.Sc
Environmental Assessment Specialist, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 343-551-4196

From: [Froess, Ryan](#)
Cc: [Adam Zenobi \(adam.zenobi@cnsccsn.gc.ca\)](#)
[kevin.mercredi@outlook.com](#); [Chief Coreen Sayazie](#); [b-tsannie@hotmail.com](#); [Shea Shirley](#); [Garrett Schmidt](#); [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#); [jerry.bernard@erfn.net](#); [Mark Calette](#); [slandriecrossland@mns.work](#); [s.nickolet@mns.work](#); [Walter Smith](#); [Billie Jo Natomagan](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [tcooksearson@lrib.ca](#); [gchristiansen@lrib.ca](#); [lournouf@mns.work](#); [tex.mns@sasktel.net](#); [Eric Sylvestre](#); [chief1@birchnarrows.ca](#); [norma.catarat@outlook.com](#); [Elmercampbell35@gmail.com](#); [glenmccallum](#);
Bcc:
Subject: CNSC Participant Funding Notice - Denison Mines Draft EIS
Sent: 2022-01-10 3:33:00 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Funding is available to assist Indigenous peoples, members of the public and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Denison is proposing to develop an in situ recovery uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit a completed participant funding application is March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/ptp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

For questions about this specific funding opportunity, please contact:

Mr. Adam Zenobi
Participant Funding Program Administrator
613-415-2814
ptp@cnsccsn.gc.ca

Thanks,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnsccsn.gc.ca | Cell: 306-914-7892

For all the latest CNSC news, visit CNSC's homepage at <http://www.nuclearsafety.gc.ca/eng/>

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If you experience any difficulties in accessing the CNSC website, please send an email to cnsccsn.info@cnsccsn.gc.ca

To unsubscribe, send an email to cnsccsn.info@cnsccsn.gc.ca

From: [Froess, Ryan](#)
To: [Walter Smith](#)
Cc: [Yen, Wish](#); Mossop, Veronica; [Way, Jessica](#); [Levine, Adam](#);
Subject: CNSC/KML - Denison Meeting (Jan)
Attachments: [Presentation_for_KML_-_Wheeler_River_Jan_2022.pdf](#)
Sent: 2022-01-21 4:54:21 PM

Good afternoon Walter,

Please find the meeting notes (thank you Wish) and PDF presentation from Wednesday January the 19th, 2022. Please let us know if we've missed anything?

Let me know some dates/times that work well for our next meeting Walter and I will do my best to coordinate with our team.
FYI - I will be away on a family holiday from Feb 19-26th.

Have a great weekend!

Ryan

Meeting between CNSC staff and Pinehouse (KML) – January 19th, 2022

Attendees

KML: Walter Smith

CNSC: Ryan Froess, Adam Levine, Jessica Way, Veronica Mossop, Wish Yen

KML and Denison engagement

- KML and Denison are holding regular and frequent communications on various projects, including Wheeler River – KML is happy with the current level of engagement
- Currently negotiations are underway with Denison, with formal documents under review by Walter, the vice-president and president of KML – potential to hire external consultants may be possible
- Denison has brought forth valued environmental components (VEC) discussions
 - KML VECs were provided to Denison to ensure they are incorporated into the EIS
 - KML is happy with the collaborative approach by Denison
 - KML requests more information regarding VECs and how CNSC uses the information
- Exploratory drilling programs by Denison to begin in the summer
 - KML is working with Denison to ensure the community participates in the program and they are pleased that Denison is being proactive rather than reactive in engagement

Wheeler River EIS Engagement

- Capacity is currently limited, external contractors may not be possible to contract even with funding
- KML does not want to hinder industry as the industry does provide benefits to the community – KML wants industry to provide the opportunity to bolster and build the Cree language and culture

Participant Funding Program (PFP)

- A separate meeting on the PFP process can be set-up at KML's availability
- Put in a request for the amount needed, Adam Zenobi from CNSC can provide PFP application forms and guidance on the PFP application process. Adam L. clarified that:
 - Funding can be applied for hiring external consultants, technical experts, travel, participation in a commission hearing, administrative costs, meeting costs
 - Funding can not be provided for salaries, but time can be charged as professional fees
 - Funding applications are reviewed by an independent funding review committee that provides recommendations for funding allocations
- CNSC staff looking for clarification for how KML and the MNS will be collaborating on the Wheeler River project
- As KML is the closest and most likely impacted Metis community, which is important information to highlight in KML's funding application to the CNSC

KML and MNS engagement

- KML and the MNS (Matt Vermette) have open communications
- KML will have discussions with the MNS and would like to lead and act on behalf of the Metis citizens from KML on the Wheeler River project.

KML and CNSC Consultation processes

- KML has indicated they wish to be involved in all activities related to the Wheeler River Project
- The community will be applying for PFP funding to ensure capacity to participate
- KML will discuss further with MNS staff (including Matt Vermette and the MNS Lands Department) on next steps and discuss with CNSC at our next meeting.

Terms of Reference (ToR) with CNSC

- The ToR would be a consultation agreement between CNSC and KML, taking into consideration activities that would be completed for a project; identifying KML's interests in projects; how involved in activities KML would be and how the engagement would take place
- CNSC staff are currently negotiating a ToR for consultation with MN-S which includes the NexGen Rook 1 Project and Denison's Wheeler River Project. CNSC staff would like to work with MN-S and KML to explore options for inclusion of KML to lead and participate in the Wheeler River components, if possible. CNSC staff are flexible on the approach and are open to exploring different options with KML moving forward.

Rights Impact Assessments (RIA)

- CNSC and KML would collaborate to determine how the project would impact KML rights in the area including mitigation measures and working with Denison to address impacts
- CNSC and Denison – Denison must demonstrate active consultation with KML and ensure that their consultation is effective and registers KML concerns or issues
- CNSC staff can provide additional guidance / potentially example on this, for more context in future meetings

EA Report

- Completed by CNSC staff
- CNSC staff will review and consider how KML's interests and knowledge is represented in the EIS submitted by Denison
- The report will be submitted to the Commission for review

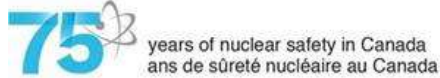
Next Steps and Actions Items

- KML to discuss CNSC participation in Denison's VEC meetings
- KML will follow up with MN-S to validate the role of KML / MN-S for projects of interest
- CNSC will provide the KML a detailed list of activities and tentative timeline of the Wheeler River Project

Thank you,

Wish Yen

Environmental Program Officer | Agente des programmes environnementaux
wish.yen@cnscccsn.gc.ca | 343.553.2233



-----Original Appointment-----

From: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>

Sent: January 10, 2022 11:28 AM

To: Froess, Ryan; Phaneuf, Marcelle; Way, Jessica; Walter Smith; Billie Jo Natomagan

Cc: Adam Levine (CNSC/CCSN); Yen, Wish; Mossop, Veronica

Subject: CNSC/KML - Denison Meeting (Jan)

When: January 19, 2022 11:00 AM-12:00 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

Hi Walter,

I think we had discussed having the following on the agenda but feel free if you wanted to add anything or any changes?

1. CNSC EA Process and Timelines
2. Participant Funding Program for Denison Project (how to apply, deadlines)
3. KML Planning – Opportunities for Involvement in the EA Process
4. Action items and Next meeting

Thanks,
Ryan



Wheeler River Project

Environmental Assessment (EA) Process Overview & Indigenous Participation

Presentation to Kineepik Métis Local Pinehouse #9
Jan 18, 2022

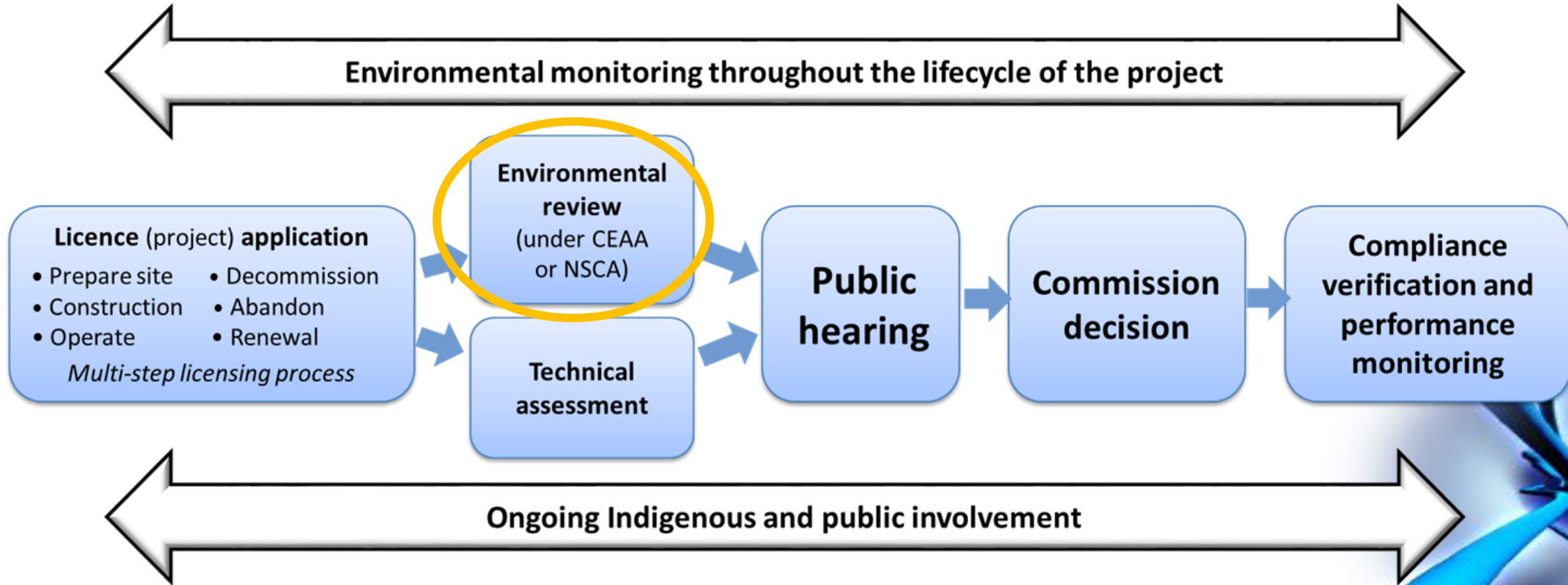


Wheeler River Project

- Joint venture project owned by Denison Mines Corp and JCU Canada Exploration Company Ltd.
- Proposed uranium mine and processing plant in the eastern area of the Athabasca Basin region
- *In situ* recovery mining process and precipitation processing plants
- Closed loop process reusing water from precipitation process to inject into *in situ* recovery mining



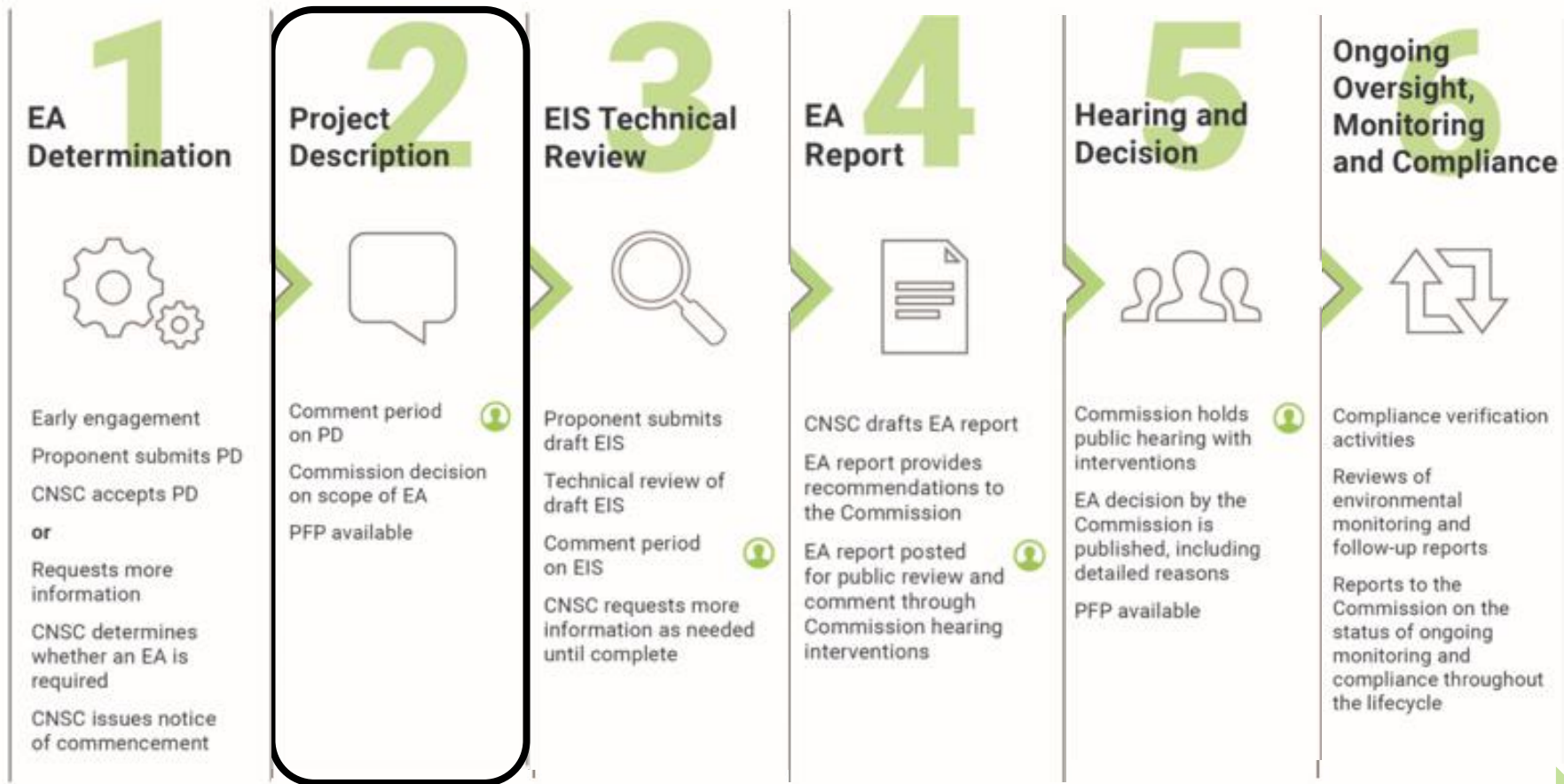
Environmental Protection Framework





Environmental Assessment Process

Canadian Environmental Assessment Act, 2012



Legend

EA: Environmental Impact Assessment
PD: Project Description
EIS: Environmental Impact Statement
PFP: Participant Funding Program
👤 : Formal Participation Opportunity

Ongoing public engagement and Indigenous Consultation throughout the EA Process



Importance of Indigenous Participation in the EA Process

*Incorporate
traditional
knowledge*

Understand the effects and potential impacts of the project on potential or established Indigenous or Treaty Rights

Ensure mitigation and accommodation is considered to address effects and potential impacts

Determine significance of adverse effects

The CNSC looks at potential impacts on the ability to exercise potential and established Indigenous and Treaty Rights in the future, should the project be allowed to proceed.



Indigenous Participation in the EA Process and EA Report

Some ways that KML might choose to participate:

- Regular correspondence and meetings to provide project updates throughout
- Public comment periods (on the draft EIS)
- Signing of Terms of Reference for consultation (if desired)
- Consultation on CEAA 2012 section 5(1)(c) effects due to the project
- Participation on the Federal and Provincial Review Team for the draft EIS
- Review and collaborative drafting of relevant sections of the EA Report
- Collaborative drafting of Rights Impact Assessments

Funding available for the activities listed above



Participant Funding

- Participant funding offering opened on January 10th, 2022
- Up to \$250,000 in participant funding will be disbursed among all eligible applicants
- Supports participants in providing new, distinctive and valuable information on Denison's upcoming draft EIS and related documentation
- This phase of funding to assist in the review of the draft EIS
- A second phase of funding will come, to assist with participation in the the review of the EA report and CMD

The deadline for submitting a participant funding application is March 14, 2022



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

Canada

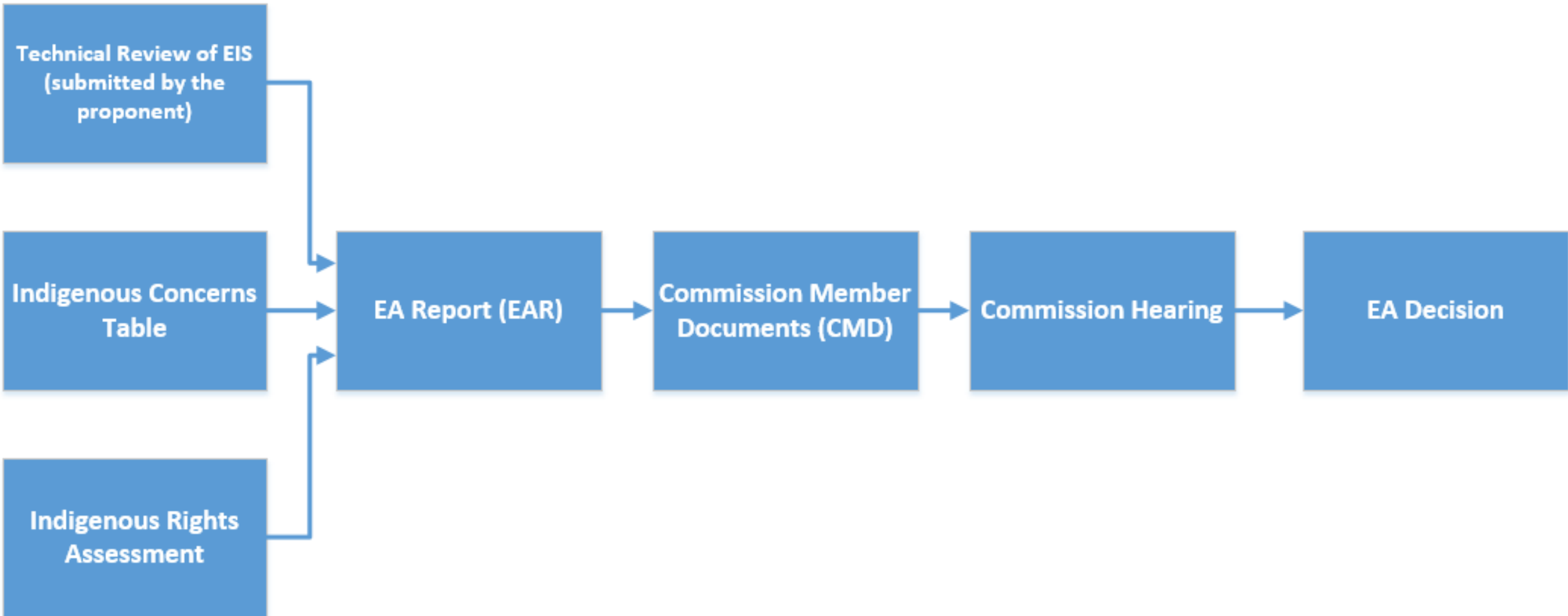


Questions?





Outputs of the EA process



From: Way, Jessica
To: wsmith@kineepik.ca
Cc: bnatomagan@kineepik.ca; aross@kineepik.ca; [Zenobi, Adam](#); [Yen, Wish](#); [DeCoste, Laura](#); [Froess, Ryan](#);
Subject: CNSC-KML Meeting Minutes - February 17, 2022
Sent: 2022-02-25 3:24:18 PM

Hi Walter,

Below are the meeting minutes from our meeting last week.

Please let us know if you have any questions or concerns.

Thanks,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

CNSC-KML Meeting Minutes – February 17, 2022, 2:15-3:30PM (EST)
Attending: Walter Smith; Adam Zenobi; Ryan Froess; Laura DeCoste; Jes Way

Participant Funding Program

- CNSC confirmed that the PFP can be used for work on Denison file which goes beyond regular salaried duties
- KML will submit a draft PFP application to CNSC for review and feedback prior to the deadline
- KML has expressed interest in training for staff to understand the EIS process
 - Currently training is taking place at a high level, but the KML would like to have additional training on how to effectively participate in the EIS process, how to highlight VCs which cause triggers/cumulative effects for regulators and the proponent
 - Additional training for general skills was requested, such as project management to run this process
 - Funding for building capacity, including training community members, is out of scope for PFP
 - KML can hire consultants to fill in gaps in knowledge under the PFP
 - CNSC can provide support and training for the EIS related processes through presentations to the team or via webinars

Cumulative effects from projects

- KML has expressed concern regarding cumulative impacts from various provincial and private projects within the same region
 - Increase in traffic as a result of all the industrial projects being undertaken is a concern
 - KML expressed concern that racial discrimination against cultural norms or language may take place as a result of job hiring preferences due to all the new projects proposed
 - KML shared an example of the loss of Cree within the community as industry only hired English speaking staff
 - Industry is working to ensure language and culture knowledge is transferred, and Denison is aware of this concern
- CNSC will review Denison's plans to address project effects
 - KML will reciprocate and provide responses on broader community impacts
 - The information may be disseminated to the community via a webinar

EIS Process

- KML has requested tentative timelines for the EA process and training on the process – specifically on funding and allocation of resources for project activities
- KML reiterated interest in participating in the EA process in order to affect change prior to the project approvals
- KML has an Indigenous Knowledge study that they may consider sharing with the CNSC, but further discussions are required on this topic
- For the Wheeler River Project, KML will be representing KML interests; not the interests of Beauval, Ile-a-la-Croix, MNS Region 3
 - KML does not have capacity to represent all the groups unless additional funding is available – this includes informing, representing and acting on behalf of these groups
 - KML and MNS are working together to build capacity but MNS does not represent KML on this project
- KML has indicated there are no concerns related to safety or regulatory processes, solely concerns related to cumulative effects and capacity

Denison update

- Denison has indicated the EIS may be delayed, but there is no concrete submission date – currently anticipated in late summer
- Denison has requested KML to lead the VC with Carolanne (Denison)
 - KML is happy with this proposition and will move forward with collaborating with Denison

Action Items

- KML to complete PFP application and send to CNSC for review and feedback
 - CNSC will work with KML to ensure work remains within the confine of the funding
- CNSC to provide a tentative timeline on the Wheeler River project
- CNSC and KML to determine knowledge gaps and prepare a presentation on engagement for the EA process

From: [Way, Jessica](#)
To: bnatomagan@kineepik.ca; wsmith@kineepik.ca;
Cc: [Froess, Ryan](#); [Yen, Wish](#); [DeCoste, Laura](#);
Subject: CNSC-KML Meeting Minutes - April 13, 2022
Sent: 2022-04-22 2:44:34 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Walter, Billy Jo,

Below are the meeting minutes from our chat last week.

Ryan and I are preparing a presentation for May 10th, and he will work with you to test the connection in advance. Happy to help or participate if needed, just let me know. We were also thinking that we could use the May 11th meeting to talk about how things went during our presentation, as well as the Federal Indigenous Review team, if we have the time.

Have a great weekend,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

KML-CNSC – Denison Wheeler River Project- Meeting Minutes – April 13th, 2022 (12-1pm CST):
Attendees: KML- Walter Smith, Billie Jo Natomagan, CNSC- Ryan Froess, Jessica Way, Wish Yen

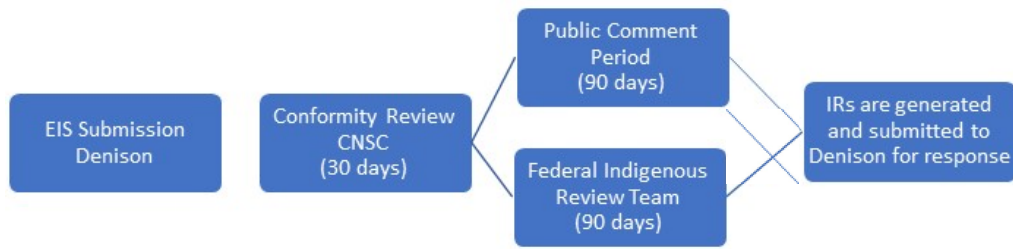
Project Updates

KML Consultation Sessions

- KML has hosted 3 consultation sessions with the community
 - KML is reaching technical capacity when responding to committee inquiries regarding the EA Process and would like to invite CNSC to present
- KML has requested that CNSC provide technical consultation sessions with the community with preference for in-person engagement
- Tentative CNSC-KML technical engagement schedule
 - 1st: High level, CNSC Who We Are and What We Do **virtual** presentation (10-ish minutes) with KML to provide updates afterwards (May 10th, 6pm CST)
 - 2nd: Joint CNSC and Denison presentation – CNSC could present an overview of the EA Process and Denison the project – Dates TBD
 - 3rd: CNSC presentation on detailed EA process for the proposed Wheeler River project. CNSC engagement with KML could be incorporated in this presentation as well
- CNSC-KML Engagement Session Preparation
 - 1st session: KML has requested testing and troubleshooting the webinar in advance of the presentation – Ryan can work with Walter on week of April 25th
 - CNSC is able to sponsor an in-person community dinner through PFP if we visit in the fall. KML suggests bringing CNSC “swag” to engage community members at in-person meetings
 - Community meetings are generally planned with 30 minutes for a meal and 1 hour for presentation and discussions
 - KML will be digitally recording and transcribing the meeting

Federal Indigenous Review Team

- CNSC will complete a conformity check to ensure all information is present in the draft EIS (30 days)
- FIRT (technical review of draft EIS) (90-day review) – formal technical Indigenous knowledge applied
 - Federal and Indigenous participants contribute according to their area of expertise (limited scope of review)
 - Denison to provide an overview of the project in a presentation for subject matter experts (SMEs)
 - CNSC invites KML to provide expert knowledge, ideally Walter or someone close to the community who can represent the community's knowledge if interested
 - Although the process is 90 days, participants must complete the review within 8 weeks so there is time to compile the information requests (IRs)
- Public Comment Period (90-day review) – funded by PFP and should involve community comments
 - Open to the public, Indigenous Nations and communities and other stakeholders for comments and concerns
 - All aspects of the EIS can be commented on in this review
 - This review is concurrent with the FIRT review



Participant Funding Program

- CNSC has made a request for a PFP budget Increase, hopefully to be approved in the Fall
 - PFP increases could provide capacity for Nations and communities in the future
 - CNSC to provide additional information to follow once a decision has been provided to CNSC staff.
 - A decision by the Federal Review Committee (FRC) on the PFP application that KML submitted to review the Draft EIS should be available in May

Wheeler Project Updates

- Denison is anticipating submission of draft EIS in late August/September
- Denison submitted the Application to Operate a Pollution Control Facility to the Province
 - Denison will need to apply for a nuclear substance possession licence from CNSC due to the potential for exceeding a threshold for the amount of uranium to be extracted

KML-Denison engagement

- KML has received the Application to Operate a Pollution Control Facility from Denison for review
 - KML was informed that once uranium is extracted, the field test will be completed and no additional work will take place
- KML is working in real time with Denison – Denison has been very active in engagement and KML is pleased with engagement to date.
- KML is currently working with Denison to validate valued components
 - KML aims to keep VCs general and has made this clear to Denison. KML is not representing other Métis communities for the VCs provided to Denison
- KML has indicated concern as they are not representing other Metis locals/communities and do not want to have any statements made to Denison to represent any other groups other than KML. KML will be risk managing information shared with Denison
 - Denison has been made aware that specific recommendations to the community should not be identifiable to KML
 - Maps, territory and other KML specific information can/should be identifiable to KML

KML-CNSC engagement/consultation

- KML wants engagement with CNSC to continue and wants more information and knowledge transfer sessions from CNSC
- KML re-iterates they are a part of MN-S and MN-S is a representative of Region 3. For the Wheeler River project, KML represents Pinehouse and will follow the community's directives. MN-S will only be a resource as needed.
- CNSC has worked with KML on the revised PFP application and has been submitted

Action Items

- KML to propose dates for 2nd and 3rd information sessions and if they wanted CNSC to be involved
- KML to reach out to MN-S for further discussion/clarification on the Wheeler River Project delegation
- CNSC will share the FIRT guidance document and go through presentation at next monthly meeting with KML (May 11 or June?)

From: [Walter Smith](#)
To: [Way, Jessica](#); [Billie Jo Natomagan](#); [chelsea_iron@cameco.com](#); [Denise Natomagan](#);
Subject: RE: KML-CNSC Meeting minutes & Engagement Session 1 Questions - May 10th and 11th, 2022
Sent: 2022-05-25 3:21:50 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Yes the timing for our consultation meeting is set always with the same schedule as the previous one. Doors are open at 5 pm supper at 5:30 followed by our presentation and the CNSC presentation at around 6:00 pm. We are hopeful but as f yet we only have one confirmed DTC process which is occurring today.

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Wednesday, May 25, 2022 1:56:53 PM
To: Walter Smith <wsmith@kineepik.ca>; Billie Jo Natomagan <bnatomagan@kineepik.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; DeCoste, Laura <laura.decoste@cnscccsn.gc.ca>
Subject: RE: KML-CNSC Meeting minutes & Engagement Session 1 Questions - May 10th and 11th, 2022

Great, thanks Walter.

Would the meeting on the 13th be at around the same time - 6pm Saskatchewan time? We can plan to be there to present, and I realize the time might not yet be set in stone, but we can aim for that and you can let us know when the plan is solidified.

Jes

From: Walter Smith <wsmith@kineepik.ca>
Sent: Saturday, May 21, 2022 8:41 AM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>; Billie Jo Natomagan <bnatomagan@kineepik.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; DeCoste, Laura <laura.decoste@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Re: KML-CNSC Meeting minutes & Engagement Session 1 Questions - May 10th and 11th, 2022

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Thank you Jessica we truly appreciated CNSC introduction to the community. We are planning on the next DTC meeting which we are tentatively planning for the 13. We look forward to learning more about CNSC role in the EA process.

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From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Tuesday, May 17, 2022 5:06:19 PM
To: Walter Smith <wsmith@kineepik.ca>; Billie Jo Natomagan <bnatomagan@kineepik.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; DeCoste, Laura <laura.decoste@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: KML-CNSC Meeting minutes & Engagement Session 1 Questions - May 10th and 11th, 2022

Hi Walter,

Here are our meeting minutes from last week's meeting.

A couple of follow up items:

- Our next meeting is June 15th, and we are planning to give our presentation on the FIRT. I will send the FIRT guidance documents shortly, as they are currently under revision.
- Ryan mentioned you and he had discussed potentially having us attend the next community meeting in order to present on the EA process that week of June 13th. Is the meeting scheduled and is there a particular day and time that would work for you?

If you have any questions or comments about the below, please let us know.

Thanks,

Jes

KML-CNSC Meeting Minutes – Denison Mines Wheeler River Project:

Date/time: May 10th, 2022 1–2 PM EST

Attendees: KML - Walter Smith, CNSC - Jessica Way, Ryan Froess, Wish Yen

PFP

- PFP decision is expected in two weeks and the CNSC can provide a walkthrough of the decision at KML's request

KML and Denison Engagement

- June 1st – Denison tour on the Wheeler River Project with the KML community
 - KML is anticipating many community members attending the session
- CNSC is reviewing the possibility of attending Denison's engagement sessions in person
 - KML would like to build the relationship with CNSC in person if possible but understand as a bit last minute
- Denison is very engaged with KML and an exploration agreement has recently been signed

KML and Province of Saskatchewan Engagement

- Province of SK (Environmental Assessment Office) is completing the Duty to Consult on the Wheeler River Project Field Test application
 - Province of SK has indicated they have been reaching out to the KML but has not received a response
 - CNSC reached out to the Province of SK and connected them with KML (Walter)
- KML also wants to understand the Province's environmental assessment process as soon as possible

KML and MN-S Relationship

- KML reiterates that on the Wheeler River Project, activities will remain separate for the PFP
 - KML will remain in charge of representing the Pinehouse/ Kineepik Métis Local community
- MN-S will represent KML on broader larger issues not related to the Wheeler Project, such as government to government relationships or land based concerns

KML and CNSC

- KML wants to reiterate that Pinehouse/Kineepik Métis Local is one of the primary impact communities or for Indigenous rights for the Wheeler River Project, as well as ERFN
- CNSC Engagement Sessions
 - Session #1 May 11th 6:15PM – 6:45PM – Broad overview of the CNSC as a regulator – introduction to the community
 - Session #2 (TBD) – CNSC EA Process – Ryan and Walter discussed, we need to schedule (CNSC wondered about the week of June 13th)
 - Session #3 (TBD) – CNSC Licensing Process
 - Future sessions – Operations and Closing
- Although sessions are currently virtual, the KML has requested in-person engagement on future sessions to meet and learn from the community directly – CNSC has communicated we would like to visit fall of 2022.

Action Items

- CNSC will share the FIRT guidance document and go through presentation at next monthly meeting with KML
- CNSC to connect KML (Walter Smith) and the Province of SK (Aimann Sadik) (COMPLETE)
- CNSC to verify or develop graphics for projects to show an impacted community perspective on the EA process

Questions Received from CNSC and KML Engagement Session #1 on May 11, 2022.

Q (René): When are hearings taking place? Will they be in Saskatchewan?

A (CNSC): Hearings have been taking place virtually as a result of COVID restrictions, but are moving towards a hybrid format with in-person and virtual interventions available. Holding hearings in-person in smaller communities is difficult due to the resources available for hosting, including hotels for the Commission, the proponent, staff and intervenors.

Q (René): I have experience in the mining industry, and as a land user would like to provide my knowledge and experience to the Commission, how can I do this?

A (Walter): Walter has offered to provide one-on-one discussions with members who are interested in intervening to ensure they all have the opportunity to participate in this process.

A (CNSC): The KML has applied for participant funding to help support briefing the community of the project and ensure the community is able to participate. This information is available publicly and the results of the PFP request by the KML will be available in the next couple of weeks. CNSC staff also plan to visit the community and would really welcome the opportunity for talk with you and can share more about how you and your community can get more involved.

From: [Walter Smith](#)
To: [Way, Jessica](#)
Cc: [Billie Jo Natomagan](#); [Mallory Lariviere](#); [Froess, Ryan](#); [Yen, Wish](#);
Subject: Re: CNSC Presentation May 11, 2022
Attachments: [2022 May 11 - CNSC-KML_Presentation_-_Who_We_Are_What_We_Do.pdf](#)
Sent: 2022-05-11 11:20:55 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Thank you for your time and your presentation to the community. We will file this with our reports. Look forward to our next engagement

Sent from my iPhone

On May 11, 2022, at 7:17 PM, Way, Jessica <jessica.way@cnsccsn.gc.ca> wrote:

Hi All,

Thanks again for your time today, for allowing us space in your meeting and for getting us connected! So great to get to see so many faces, even if not in person.

Attached is the presentation we gave (PDF version). Please let me know if you have any issues accessing it. You are welcome to share with meeting attendees.

Have a good evening,

Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

Agent en évaluation environnementale | Division de l'évaluation environnementale
Commission canadienne de sûreté nucléaire | Gouvernement du Canada
Jessica.Way@cnsccsn.gc.ca | Tel : 343-540-6213



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

Canada



CANADIAN NUCLEAR SAFETY COMMISSION

Who We Are and What We Do





Introductions – Wheeler River EA Contacts

EA Lead: Jes Way

Environmental Assessment Officer

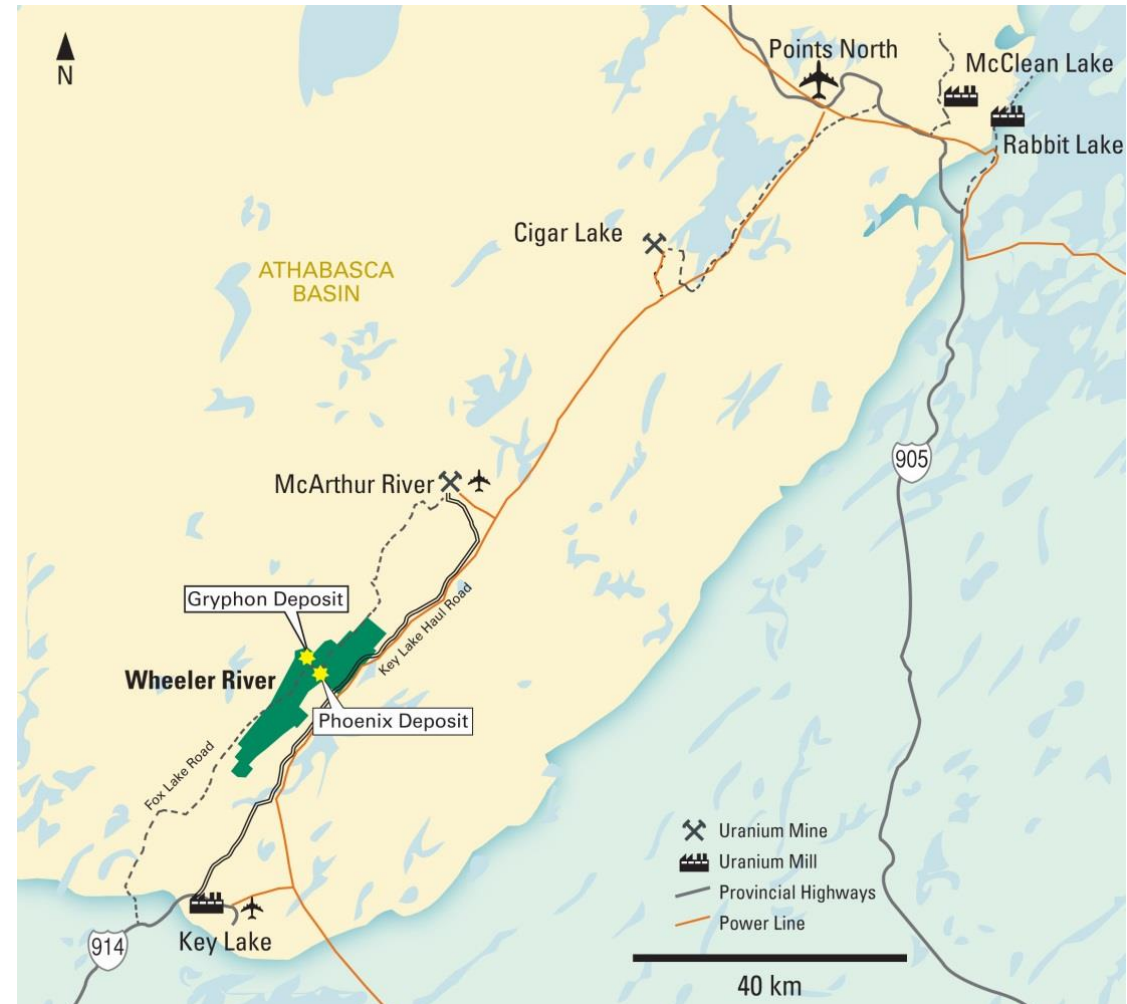
Ryan Froess

Senior Advisor, Indigenous and Stakeholder
Relations Division

Wish Yen

Environmental Assessment Officer

Email: wheelerriver@cnsccsn.gc.ca



(Source: Denison, 2018)



Canadian Nuclear Safety Commission (CNSC)



Canada's Nuclear Watch Dog for Over 75 Years



The CNSC Regulates All Nuclear-Related Activities and Substances in Canada

Uranium mining



Transportation



Dosimetry



Nuclear research



Uranium fuel processing



Nuclear medicine



Nuclear power generation



Radioactive waste management



Nuclear substance processing



Independent Commission

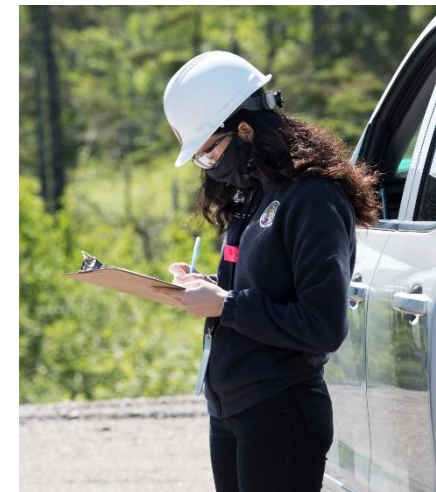


- Quasi-judicial administrative tribunal
- Agent of the Crown (Duty to Consult)
- Reports to Parliament through Minister of Natural Resources
- Considers the public and Indigenous communities' concerns and knowledge in decisions
- Commission members are independent and part-time
- Commission hearings are public and Webcast
- Staff presentations in public
- Decisions are reviewable by Federal Court

Transparent, Science-based Decision Making

The Role of CSNC Staff

- Conduct assessments on information submitted by applicants and licensees to verify that they meet requirements
- Make recommendations to the Commission
- Implement Commission decisions
- Develop regulatory requirements and guidance for Commission approval
- Verify and enforce compliance with regulatory requirements
- Engage the public and Indigenous groups through outreach activities





CNSC – What We Do (And Don't Do)



WHAT WE DO

Work for Canadians

Regulate the use of nuclear energy and materials

Disseminate information to the public

Value Indigenous knowledge

Make evidence-based decisions

Review applications/issues licences to qualified applicants

Verify safety and compliance

Shut down any activity we think is unsafe

WHAT WE DON'T DO

Do not promote the nuclear industry

Do not create energy policy

Do not own, manage, construct or operate nuclear projects

Do not have a role in revenue sharing, employment or economic development

Do not select sites

Not responsible for exploration of uranium deposits



CNSC STAFF LOCATED ACROSS CANADA

Headquarters (HQ) in Ottawa
Four site offices at power plants
One site office at Chalk River
Four regional offices



Saskatchewan Uranium Mine and/or Mill Sites

Operating

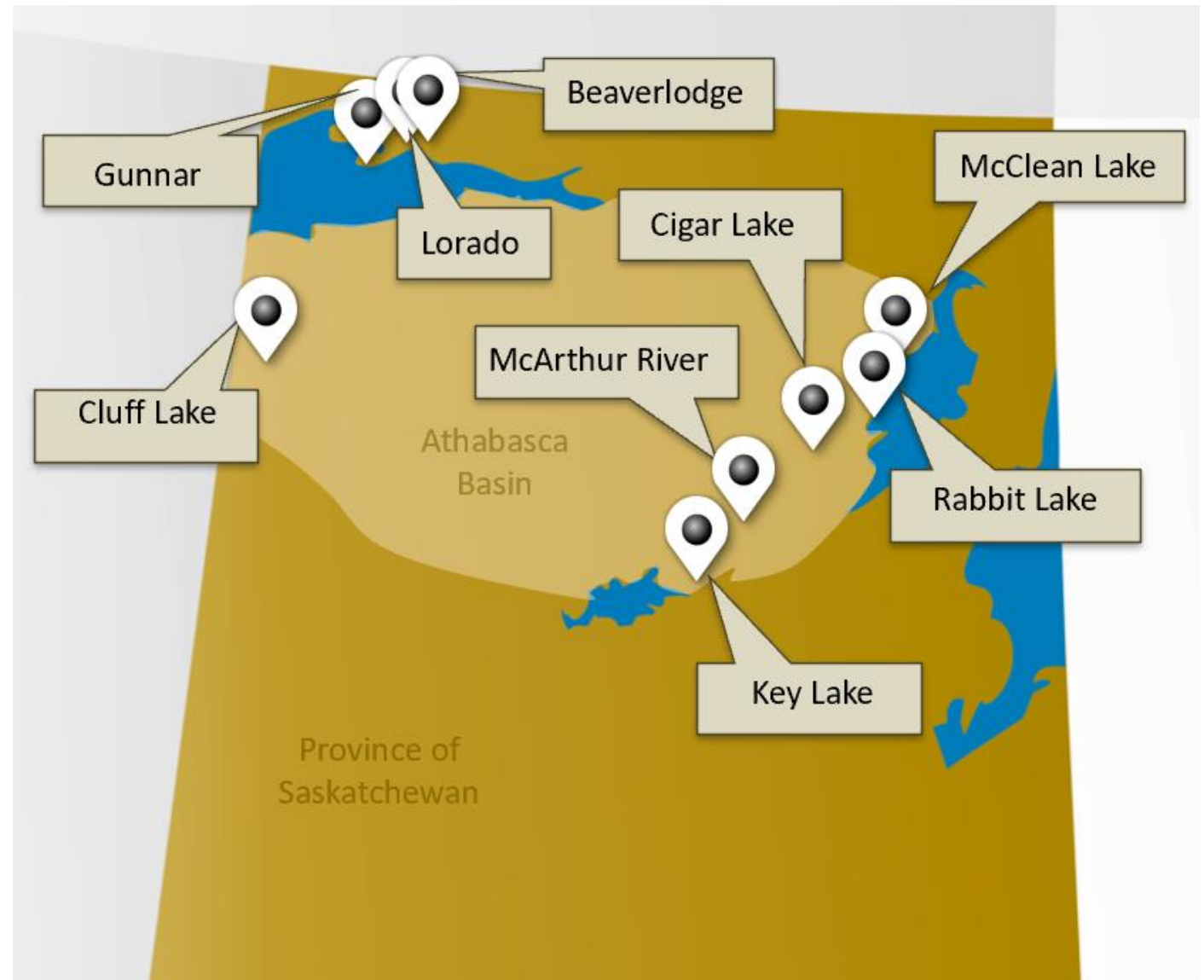
- Cigar Lake Operation (mine)
- McArthur River Operation (mine)
- Key Lake Operation (mill)
- McClean Lake Operation (mine/mill)
- Rabbit Lake Operation (mine/mill)

Decommissioned

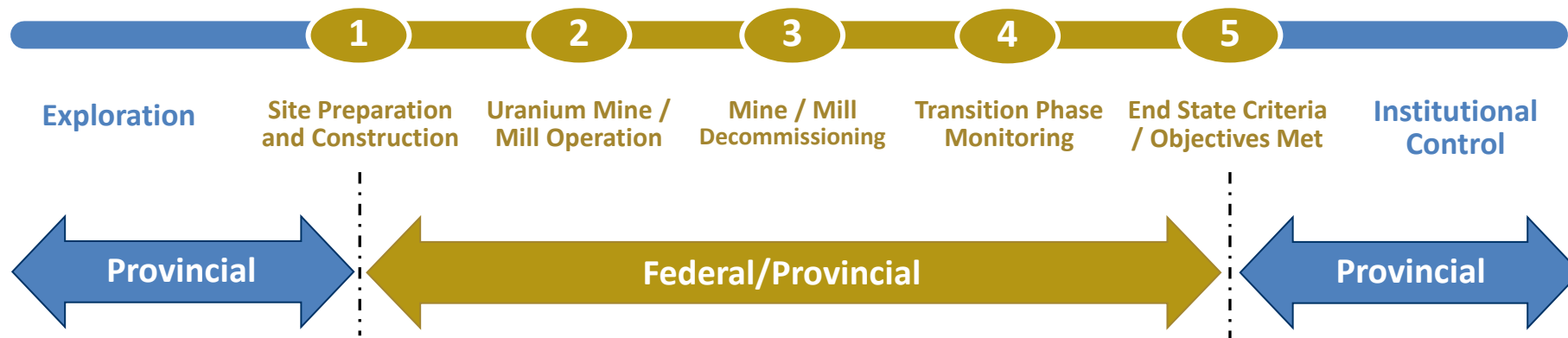
- Beaverlodge Project
- Cluff Lake Project

Remediation Projects

- Gunnar
- Lorado



Saskatchewan Uranium Mines and Mills Life Cycle



Responsibility begins with the province and returns to the province after decommissioning is completed

Open and Transparent Regulator

- Regulatory, environmental, and nuclear safety information published on CNSC's website & shared on social media
- Community outreach activities
- Responsible for meeting the Crown's duty to consult with Indigenous peoples and upholding the honour of the Crown
- Committed to building long-term positive relationships with Indigenous communities
- Public and Indigenous groups invited to participate in Commission proceedings, environmental impact assessments, and licensing reviews
- Participant Funding Program (PFP)



Committed To Building Trust

CNSC's Commitment to Indigenous Peoples

- To strengthen CNSC's relationships with Indigenous Nations and communities, and develop ongoing, respectful, and open dialogue
- To learn about and address Indigenous communities' issues and concerns in meaningful and productive ways
- To support Indigenous communities' participation in CNSC regulatory processes



CNSC's Participant Funding Program

- Gives Indigenous Nations and communities, the public, and stakeholders the opportunity to apply for funding from the CNSC to participate in its regulatory processes
- Open for all public Commission hearings, meetings, environmental monitoring, and more through a funding application process
- Applications are reviewed by an external committee



Established in 2011

Engagement and Consultation is about building and maintaining trust

- Trust in regulators is key to acceptance of decision making
- The industry, who is responsible for safety, has a key role in building trust with the public and policy makers
- Both need to establish their own long-term relationships based on cooperation, information sharing, and robust communication amongst public and Indigenous groups



THOROUGH ENGAGEMENT AND CONSULTATION IS ALWAYS
PART OF THE REGULATORY PROCESS



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

Canada

Thank You! Questions?



1-800-668-5284 · cnsccsn@canada.ca

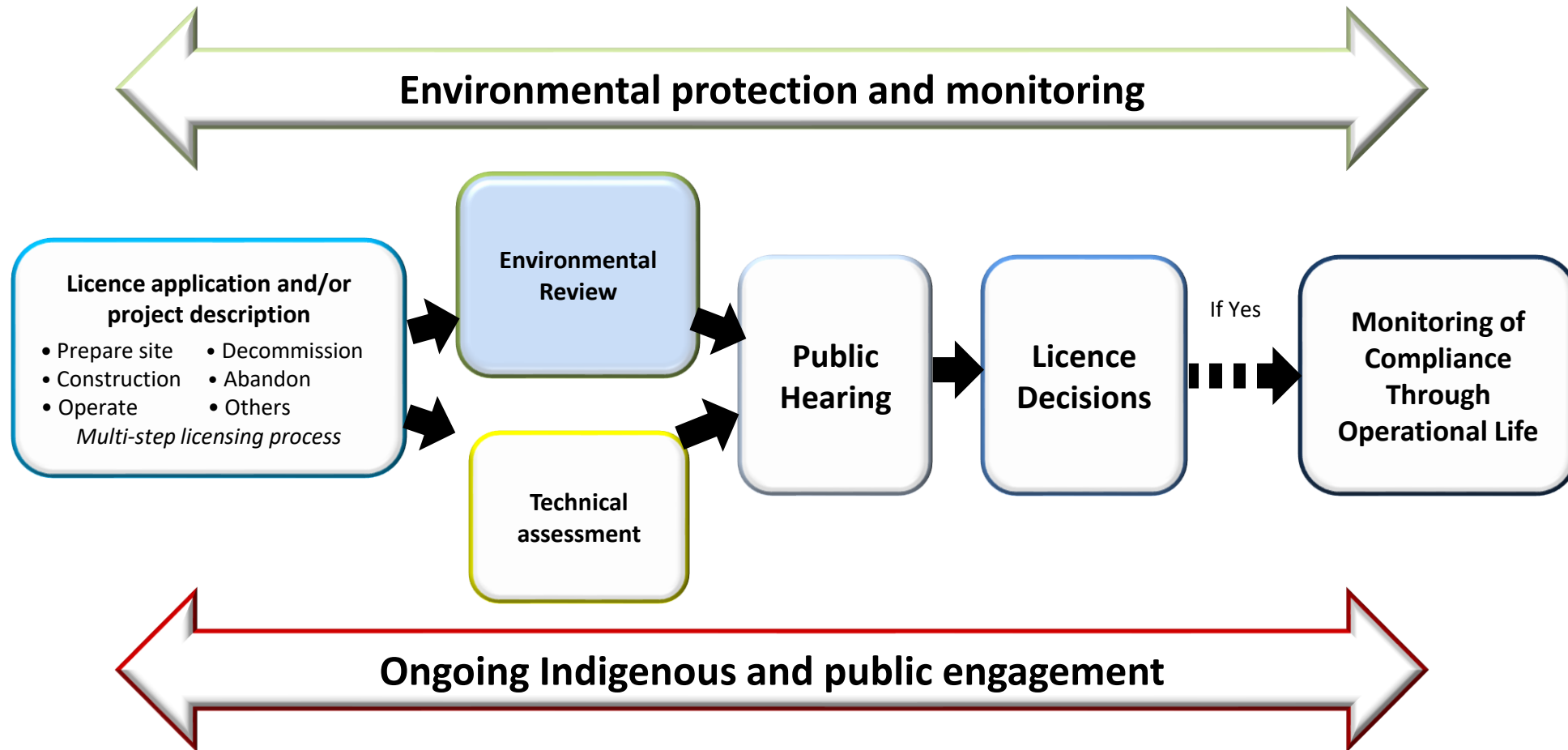
nuclearsafety.gc.ca



References

- How the CNSC Regulates: <https://youtu.be/arSY-rnCNV8>
- CNSC Hearing Process: <https://youtu.be/4wz6upY1c1s>
- Participant Funding Program: https://youtu.be/GTkYQ_b27I
- Independent Environmental Monitoring Program:
<https://youtu.be/WegnVE-1cw8>
- Nuclear Safety and Control Act: <https://laws-lois.justice.gc.ca/eng/acts/n-28.3/index.html>
- Wheeler River Canadian Environmental Assessment Registry:
<https://ceaa-acee.gc.ca/050/evaluations/proj/80178?culture=en-CA>

CNSC's Licensing Process



From: [Way, Jessica](#)
To: nvp.mike@sasktel.net
Cc: [Kwamena, Nana-Owusua](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Akhter, Salman](#); [Way, Jessica](#); [Yen, Wish](#); [Levine, Adam](#); [Froess, Ryan](#); [Aimann Sadik](#); [England, Brianne ENV](#); wsmith@kineepik.ca; bnatomagan@kineepik.ca;
Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application
Attachments: [6814216-v1A-2022_Wheeler_River_Field_Test_-_Notification_Letter_to_KML.pdf](#)
Sent: 2022-06-17 4:22:17 PM

Dear Mr. Natomagan,

The purpose of the attached letter is to notify you of an application from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,
Jes Way

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213



June 17, 2022

e-Doc: 6814216

Mike Natomagan
Kineepik Métis Local Pinehouse #9 (Métis Northern Region 3)
nvp.mike@sasktel.net

Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Dear Mr. Natomagan:

This letter is to inform you that Denison Mines Corp. (Denison) has submitted an application to the Canadian Nuclear Safety Commission (CNSC) for a Nuclear Substances and Radiation Devices licence, for the Wheeler River Exploration Project in northern Saskatchewan. This licence application is for the temporary storage and use of natural uranium in laboratory studies, for a 60 day feasibility field test that Denison are planning to conduct in August 2022. Following completion of the test, the recovered material will be temporarily stored above ground.

Proposed Wheeler River Project

The Wheeler River Property is located in the eastern part of the Athabasca Basin, approximately 4 km west of Highway 914 and 35 km north of the Key Lake mill. Denison has proposed a project to construct, operate, and decommission an in-situ uranium mine. An [Environmental Assessment \(EA\) under the Canadian Environmental Assessment Act of 2012](#) (CEAA 2012) has been underway since 2019 for the proposed Wheeler River Project, led by CNSC staff. Concurrently, the Government of Saskatchewan is also leading a [provincial EA](#).

Field work at the site has been occurring since 2007, with advanced drilling and testing occurring since 2019. These activities have had continual oversight from the Saskatchewan Ministry of Environment, and the CNSC as necessary.

It is important to note that the proposed feasibility field test is not within the scope of the CEAA 2012 EA, as this is a distinct project. The field test could therefore proceed prior to an EA decision.

Feasibility Field Test

Through the feasibility field test, Denison intends to validate previous testing and determine the feasibility of the proposed in-situ recovery mining methodology at the Wheeler River Property. This test requires no new clearing of land or new drilling, only the construction of limited temporary surface facilities.

During the planned test, mineralized material will be removed from the ground through a process that includes injecting a solution into test wells, separating liquids from solids, and collecting the resulting materials for further analysis. These materials are expected to contain elevated levels

natural uranium, and samples will be analysed for general chemistry at the on-site chemical laboratory and later transported to the Saskatchewan Research Council in Saskatoon for further analysis. Once all analysis is complete, materials will be placed in above ground storage tanks, and will remain the property of the Crown, under the oversight of the Saskatchewan Ministry of Environment (SMOE).

In March 2022 an application was also submitted to the SMOE, as Denison requires a permit to construct and operate a pollutant control facility prior to conducting the proposed feasibility field test. This permit is required under Saskatchewan's *Mineral Industry Environmental Protection Regulations, 1996*, and the application remains under provincial review.

Licensing Process

Unlike Class I nuclear facilities and uranium mines and mills, licences for use of Nuclear Substances and Radiation Devices are issued by a Designated Officer (DO) of the CNSC. A DO is a member of CNSC staff who has been designated specific powers under the *Nuclear Safety and Control Act* with respect to licensing and compliance. Like the Commission, DOs demonstrate independence and procedural fairness. With their extensive knowledge, regulatory training and operational experience, DOs are well qualified to make decisions on behalf of the Commission. DO decisions are based on rigorous reviews performed by CNSC staff, who verify that the applicant would meet regulatory requirements. After completing their evaluations, CNSC staff prepare DO documents – which include technical and regulatory information, conclusions and recommendations – to help inform DO licensing decisions.

Nuclear Substances and Radiation Devices licences have a service standard of 80 business days for a DO decision, from the date a complete application has been received. DOs will only grant the licence if they are satisfied that the authorized activities do not pose a risk to health, safety, security and the environment.

As an Indigenous Nation and/or community with a potential interest in Denison's licence application, the CNSC is interested in hearing any views or receiving any additional information you may have with respect to Denison's application to the CNSC for a Nuclear Substances and Radiation Devices Licence, for this proposed project.

Further Information

CNSC staff will continue to keep you apprised of the status of this licence application, DO decision and next steps, including more information on the CNSC's licensing requirements and oversight activities should a licence be granted to Denison for the proposed field test.

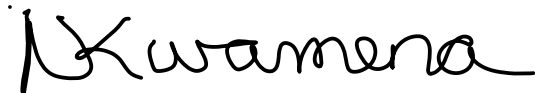
If you would like to meet to discuss in further detail, and have any questions relating to this licence application or the ongoing EA for the Wheeler River Project, please contact:

- Jes Way, Environmental Assessment Officer, Wheeler River EA Lead
Email: jessica.way@cnsccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous and Stakeholder Relations Division
Email: ryan.froess@cnsccsn.gc.ca

If you wish to receive e-mail notifications related to the EA process and other updates on this licensing process, please let us know and we can add you to the project distribution list.

You may also sign-up to the CNSC mailing list to receive notifications CNSC website is updated, including notices for hearings, meetings and Participant Funding Program opportunities. Visit the following link and choose the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

Sincerely,



Nana Kwamena

Director, Environmental Assessment Division
Canadian Nuclear Safety Commission
E-mail: nana-owusua.kwamena@cnsccsn.gc.ca

c.c.: W. Smith, B. Natomagan
S. Faille, N. Babcock, P. Burton, S. Akhter, J. Way, W. Yen, A. Levine, R.
Froess, CNSC
A. Sadik, B. England, SEASB

From: [Walter Smith](#)
To: [Way, Jessica](#)
Cc: [Billie Jo Natomagan](#); [Froess, Ryan](#); [Yen, Wish](#); [DeCoste, Laura](#); [Zenobi, Adam](#);
Subject: Re: KML-CNSC Meeting Minutes from June 17
[Notice of meeting and participant funding opportunity to review regulatory oversight report;E-DOCS-#6784056-v3-CNSC_Presentation_-_KML_Presentation_Two_-_Overview_of_the_EA_Process.pdf](#);
Attachments: [Notice of meeting and participant funding opportunity to review regulatory oversight report;E-DOCS-#6784056-v3-CNSC_Presentation_-_KML_Presentation_Two_-_Overview_of_the_EA_Process.pdf](#);
Sent: 2022-06-21 4:25:21 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Thank you for the notes very detailed and appreciated. We will continue to host our consultation meeting with community members and land users to further develop our understanding for each aspect of responsibility conducted by CNSC. We are unsure how long this will take but if we have a continuous audience that is willing to listen and learn we will continue to host and promote sharing information. Take care and look forward to seeing you in a future meeting.

Sent from my iPhone

On Jun 21, 2022, at 4:12 PM, Way, Jessica <jessica.way@cnscccsn.gc.ca> wrote:

Hi Walter,

Please see attached the minutes from our meeting on Friday.

Also attached here:

- The community presentation that Ryan and I gave on Thursday, June 16th, 2022
- The notice for the Regulatory Oversight Report for Uranium Mines and Mills in Canada: 2021 PFP offering

Note, I have also cc'd Adam Zenobi here, so that you can reach out to him with any additional questions.

At the end of the minutes, I have also included the questions raised after the presentation in the community meeting. If I missed anything, or you have any other questions or comments that need to be reflected here please let us know. Thanks again to Kineepik Métis Local for inviting us to come present – looking forward to the next one! We'll chat more about additional potential topics in the coming meetings, with consideration for information that community members will want to have going into the comment period. I've been giving this some more thought, but we will chat soon.

Sincerely,
Jes

Kineepik Métis Local (KML)-CNSC Meeting Minutes

June 17th, 2022 11:00-12:00PM SK time
Attendees: Walter Smith, Jes Way, Wish Yen

June 16th - Engagement Session #2

- Presentation went well and the community members found the session helpful
- KML feels that the community needs additional education on CNSC and our role
 - KML proposes three additional engagement sessions
 - Licensing Process (Denison hasn't applied for a licence yet, but may be of interest to the community in preparation for the licensing process)
 - Denison's draft EIS – may be of interest to KML to reach out to Denison for sections of the draft EIS
 - Additional topics to be considered
- CNSC appreciates Walter's hosting and moderating of the session and questions
- One attendee raised concerns regarding the baseline collection for the draft EIS
- KML completed a survey with attendees after the meeting
 - Regular attendees felt comfortable with the presentation and the information presented
 - New attendees require guidance and information – this can be anticipated at future sessions as members of the community learn about the project
 - GIS studies submitted to Denison were provided to the core community group to build on their knowledge and understanding of the project

- Bullet on KML and MN-S in PFP offering suggested the two collaborate on EIS review
 - In the funding release, this point is to ensure duplication of work is minimized
 - KML was expecting MN-S funding for PFP to be shared with KML
 - MN-S funding is meant for engaging other Métis nations in the region
 - KML will be following up with MN-S on their funding and engagement plans
- KML and MN-S have been meeting on a regular basis to discuss other projects
- KML has already submitted a pre-EIS document to Denison

Annual Regulatory Oversight Reports

- **What is a ROR?**
 - RORs provide information on the safety performance of licensees who are authorized to use nuclear substances
 - The reports evaluate licensees based on their safety procedures and adherence to regulatory policy
 - Key issues and emerging changes in regulation are also highlighted
- **July 15th:** PFP due date for the [ROR for Uranium Mines and Mills in Canada: 2021](#)
 - PFP should include review of the ROR, engagement with the community to share information, travel costs for in-person attendance (as needed)
 - Additional information on the application and activities to include in the funding request can be directed to Adam Zenobi (CC'd here)
- ROR information session may be locally and is anticipated for September
- Scope includes operating sites, Key Lake Mill, McArthur River Mine, Cigar Lake Mine, Rabbit Lake Mine and Mill and McClean Lake Mill
- Decommissioned sites will be reviewed again in 2024 as part of the 3-year review cycle
- KML would like to contribute to ROR with technical feedback in addition to perceived community sentiment

Action Item

- CNSC will follow up with additional information on details for the Uranium Mines and Mills ROR

Questions from Jun 16th Community Presentation, from 6-7pm SK time:

- How can community members access project documents?
- What kind of solution is being injected into the ground?
- How can we be active in participating in the EIS baseline collection process?
- When does the process end and start? When it comes to nuclear waste, the length of the life of radioactive waste extends far after project timelines.
- You said that you were transparent, but you did not answer the question about the solution being injected into the ground. How do CNSC staff respond to this?

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
 Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: nvp.mike@sasktel.net
Cc: [Kwamena, Nana-Owusua](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Akhter, Salman](#); [Yen, Wish](#); [Levine, Adam](#); [Froess, Ryan](#); [Aimann Sadik](#); [England, Brianne ENV](#); wsmith@kineepik.ca; bnatomagan@kineepik.ca;
Subject: Notice of Nuclear Substances and Radiation Devices Licence issued to Denison Mines Corp.
Sent: 2022-08-05 9:32:00 AM

Dear Mr. Natomagan,

In follow up to our email and letter from June 17th, this email is to inform you that a Nuclear Substances and Radiation Devices licence has now been granted to Denison Mines Corp. (Denison) by a CNSC Designated Officer.

Denison applied for a Nuclear Substances and Radiation licence for the Wheeler River Exploration Project in northern Saskatchewan in order to complete a feasibility field test of the proposed in-situ recovery mining methodology at the Wheeler River Property. This licence, which is valid from August 3, 2022 to December 31, 2023, authorizes Denison to temporarily store and use natural uranium in laboratory studies above ground.

As always, we remain available to discuss in more detail. To obtain more detailed information or for any questions, please contact Jes Way at jessica.way@cnscccsn.gc.ca or Ryan Froess at ryan.froess@cnscccsn.gc.ca.

Sincerely,
Jes

From: Way, Jessica
Sent: Friday, June 17, 2022 4:22 PM
To: nvp.mike@sasktel.net
Cc: Kwamena, Nana-Owusua <nana-owusua.kwamena@cnscccsn.gc.ca>; Faille, Sylvain <sylvain.faille@cnscccsn.gc.ca>; Babcock, Neil <neil.babcock@cnscccsn.gc.ca>; Burton, Patrick <patrick.burton@cnscccsn.gc.ca>; Akhter, Salman <salman.akhter@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Levine, Adam <adam.levine@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Aimann Sadik <aimann.sadik@gov.sk.ca>; England, Brianne ENV <brianne.england@gov.sk.ca>; wsmith@kineepik.ca; bnatomagan@kineepik.ca
Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Dear Mr. Natomagan,

The purpose of the attached letter is to notify you of an application from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,
Jes Way

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Walter Smith](#)
To: [Way, Jessica](#)
Cc: [Billie Jo Natomagan](#)
Subject: RE: KML Visit Next Tuesday, Sept 21st
Sent: 2022-09-23 10:28:11 AM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

When you arrive at the Gravel Road Junction 102 and 165 you can give me a call to let me know so I can estimate a time of arrival. I and perhaps Billie will meet you in Pinehouse and travel with you to KM 67.

As stated previously this will be a kick off to the anticipated Denison Wheeler River EIS, where we can meet and familiarize each other as we work through the next process of this project.

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: September 21, 2022 4:56 PM
To: Walter Smith <wsmith@kineepik.ca>
Cc: Billie Jo Natomagan <bnatomagan@kineepik.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: RE: KML Visit Next Tuesday, Sept 21st

Wonderful!

Send us the details of where you want us to go on the Tuesday when you can, so that we come to the right place, but sounds like we are good to go!

Thanks for getting back to me, and have a wonderful evening.

Jes

From: Walter Smith <wsmith@kineepik.ca>
Sent: Wednesday, September 21, 2022 6:45 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Billie Jo Natomagan <bnatomagan@kineepik.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: Re: KML Visit Next Tuesday, Sept 21st

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

This is exactly our plan. Get to know each other better and enjoy a meal. We are going to make bannock and fish together. Maybe a bolo tournament for entertainment.

Get [Outlook for iOS](#)

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Wednesday, September 21, 2022 4:38:50 PM
To: Walter Smith <wsmith@kineepik.ca>
Cc: Billie Jo Natomagan <bnatomagan@kineepik.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: KML Visit Next Tuesday, Sept 21st

Hi Walter!

from the province of Saskatchewan will also be attending, which means that we will have the following in attendance:

- Aimann Sadik (Province of Saskatchewan, Environmental Assessment and Stewardship Branch)
- Jes Way (CNSC, Environmental Assessment project lead)
- Neil Babcock (CNSC, Nuclear Substances and Radiation Devices Division)
- Rachel Lane (CNSC, Health Sciences and Environmental Compliance Division)
- Ryan Froess (CNSC, Indigenous and Stakeholder Relations Division)
- Salman Akhter (CNSC, Uranium Mines and Mills Division) – not confirmed, but highly likely
- Sydney Nickolet (CNSC, Indigenous and Stakeholder Relations Division)
- Wish Yen (CNSC, Environmental Assessment project back-up)

We are planning to leave Saskatoon at around 7am in our rented trucks, so we are thinking this would mean that we arrive probably closer to 2:30pm (giving us time to drop off our bags at the Lodge). Is this going to work for you? I don't think that you and Ryan had completely finalized timing, although it sounds like there was some discussion around potentially having dinner with you and the community members. Please let us know what you think. As well, I think we still need some details on where exactly we need to drive to, to meet you.

I also wanted to note, we have nothing formal planned. In recent meetings we had talked about future presentations, but going into Tuesday we are just planning to go with the flow. If you want anything more formal, please let me know and we are happy to have something prepared to speak to in more detail (or present on), if needed.

Is there anything else we need to be aware of, or that you would like us to plan for? Looking forward to meeting you in person, and we so appreciate that you have invited us to participate in this event. We are extremely excited!

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

Outreach / Engagement Report: Executive Summary

To: CNSC.F.ExecutiveCommitteeMembers / MembresDuComitéExécutif.F.CCSN

Cc: cnsccengagement.ccsn@canada.ca, Kwaku.Agwei@cnscccsn.gc.ca

Event: Pre-EIS submission outreach and consultation for the Wheeler River Environmental Assessment (EA).

Date: September 26-28th, 2022

Location: Saskatoon, Pinehouse, and Northern Saskatchewan

Attendees: CNSC staff (ISR, UMMD, HSECD, EAD), the Province of Saskatchewan, and Indigenous Nations and communities (English River First Nation, ERFN; Ya' Thi Néné Lands and Resources Office, YNLRO; Métis Nation – Saskatchewan; Kineepik Métis Local, KML). There were approximately **10 to 50 people in attendance at the culture camps in Pinehouse and Northern Saskatchewan.**

Background:

Prior to the COVID-19 pandemic, CNSC staff had planned outreach and engagement for the proposed Wheeler River EA with Indigenous Nations and communities potentially impacted by the project. Now that the CNSC has resumed in-person meetings and the EA is progressing, this trip was rescheduled for September 2022, in order to engage with community members face to face and continue building relationships. In addition to attending a meeting in Saskatoon, staff were invited to attend culture camps for ERFN (Northern Saskatchewan) and KML (Pinehouse).

Highlights:

- Met leadership from ERFN, YNLRO and KML, as well as our points of contact for these Nations in person.
- Attended ERFN and KML culture camps, where the CNSC was invited to share traditional meals prepared by members of the communities, saw a freshly harvested moose and participated in fileting fish. These activities supported the sharing of traditional knowledge and practices with the CNSC, in anticipation of the Wheeler River EA.
- CNSC shared information on the Wheeler River Project and the next steps for the EA with community members, but the primary outcome was on the ground relationship building.

Lessons Learned:

Community members have expressed confusion between CNSC and Denison's differing roles in the Wheeler River Project. Increased CNSC in-person presence, as it relates to the project, could help to reinforce this distinction, as could opportunities to consult and engage at events where Denison is not present. CNSC staff will continue working to increase the understanding of our role as a regulator, through meetings with community members, future consultation activities, and other opportunities identified in consultation with our points of contact for the Nations.

Conclusion:

During this trip CNSC staff gained a better appreciation for scope and scale of the geographic area of the proposed project, and how the Indigenous Nations and communities use the land for hunting, fishing, and trapping and cultural use on their traditional territories. It was an opportunity to meet with land users and increase dialogue that we can build upon as the project progresses.

Attachments:

Presentation(s) (e-Doc#): [Presentation of pictures from the trip](#) (6884652); [Presentation to YNLRO](#) (6776456); [Wheeler River Pamphlet](#) (6875181)



Elder Norman Wolverine showing CNSC staff and the Province of Saskatchewan a map of English River's traditional territory.



Elder's from KML cultural camp showing staff how to filet fish.

From: [Walter Smith](#)
To: [Way, Jessica](#)
Subject: RE: Thank You!
Sent: 2022-10-07 7:41:19 AM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

We as a community are hopeful things are well and getting better on the east coast after such a terrible storm. It was our absolute pleasure, to welcome you and our team to our community and for participating our fall cultural camp, hosted at kilometer 67. I am glad to hear you had a positive experience and that the visit was enjoyable. The Bolo game is tricky, one day your struggling the next game you win in 5 throws. Perhaps that will be your story on your next visit.

Yes, we do enjoy the fish for which we are blessed with, and our community cooks are amazing. We have a cultural calendar that is beginning to facilitate our cultural activities, which allows us to plan activities. As an example, the next significant cultural activity is the fall open water fishing which starts on Monday. We are also beginning to plan the November Challenge, which is a month-long community challenge to abstain from any substances and participate in many community planned activities.

Yes, I will stay connected as I journey through the Ph. D, and keep you posted on what I may need to support my studies.

We are eagerly awaiting the release of the EIS, we will immediately start reviewing the document once it is released to the public. Perhaps we can plan the next meeting for the I have an open day on October 27th if that works. Should this day work for yourselves as well please send me a calendar invite, with my schedule I need these computers to remind me where to be. I also need to apologise for missing the last two sessions and need to reiterate that I absolute appreciate these sessions as we start this new process.

Thank you and take care.

From: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Sent: October 7, 2022 5:53 AM
To: Walter Smith <wsmith@kineepik.ca>
Subject: Thank You!

Hi Walter,

Been slow to get back into the groove being here back on the East coast, but I wanted to reach out and give a delayed thanks again for having us last week. It was wonderful to finally get to meet you in person, and we so enjoyed the amazing meal at the culture camp on the Tuesday afternoon. So much to experience and see - we had a really great time, although I might not live down how horrible I am at the bolo game. Thankfully Wish took a photo, so it will be impossible for me to ever forget ☺

The food was delicious though, and everyone there was so warm and welcoming, and open to sharing. I hope we have opportunities to come and hear more information direct from community members in the future. We are grateful for the invite, so please share our thanks again, and thank you for making it possible.

Related to our conversation about your PHD, you will have to keep me updated on progress. As I mentioned, I think I have a ton of material that contains research that might support some of your theories and arguments, depending on which direction you go. Let me know if you want me to dig

conformity review were to pass, we would likely open the EIS comment period in approximately mid-November. It would probably be good to meet at least once in advance of this? Let me know what you think and I can share some potential time slots. If there are particular days that definitely do not work, please also let me know of what those are.

Hope you are having a good week!

Thanks,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan; Yen, Wish; Nickolet, Sydney; Cheyenna Hunt; jerry.bernard@erfn.net; nvp.mike@sasktel.net; wsmith@kineepik.ca; bnatomagan@kineepik.ca; glenmccallum@mns.work; Brent Laroque; Shannon Landrie-Crossland; garrett.schmidt@yathinene.com; shea.shirley@yathinene.com; kevin.mercredi@outlook.com; b-tsannie@hotmail.com; csayazie@hotmail.com; d.powder.nhsr@sasktel.net; d.classen@sasktel.net; chief1@birchnarrows.ca; norma.catarat@brdn.ca; receptionist@mltc.net; claire_larock@hotmail.com; karenbird@pbcn.ca; tmerasty@pbcn.ca; bmerasty@pbcn.ca; tcooksearson@llrib.ca; jtsanniejr@pagc.net; gchristiansen@llrib.ca; cheyenna.hunt@desnedhe.com; karenbird@pbcn.ca](#)
Bcc:
Subject: Wheeler River Project EIS Received - Conformity Review Underway
Sent: 2022-10-24 11:28:00 AM

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Walter Smith](#)
To: [Way, Jessica](#)
Cc: [Froess, Ryan](#); [Gorzowski, Konrad](#); [Nickolet, Sydney](#); [Yen, Wish](#);
Subject: Re: KML/CNSC Meeting Minutes - October 27th, 2022
Sent: 2022-11-02 9:36:43 AM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Thank you the notes are very helpful and i believe we can use it as a framework to prepare for the ROR and re licensing

Sent from my iPhone

On Nov 1, 2022, at 9:49 PM, Way, Jessica <jessica.way@cnsccsn.gc.ca> wrote:

Hi Walter,

Here are our meeting minutes from last Thursday. I just wanted to highlight something from the discussion- can you please confirm if this is accurate, or clarify for us?:

- CNSC asked about the TK study that was provided because it reads as though there may be additional information to come
 - Walter indicated that the study shared is a preliminary document and once the EIS is released then they will update the document

Is this the intent? We weren't sure if the most recent study would be updated, or if this was related to previous information that had already been collected.

Thanks,
Jes

-

Kineepik Métis Local (KML)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

October 27, 2022 – 3-4:00PM EST

Attendees: Walter Smith, Konrad Gorzowski, Sydney Nickolet, Jes Way, Wish Yen

Topics Discussed:

Wheeler River Project EIS

- Denison submitted the Wheeler River Project EIS on Friday October 21st
 - Currently undergoing through the 30-day conformity review
- KML will have 90-days to participate in the public comment period

KML Update on the Denison Wheeler River Project

- KML has signed the exploration agreement with Denison and is now starting to implement it
 - Currently there is a member from KML hired as staff working on the Wheeler River Project
 - KML will also have a cultural engagement member participating with Denison on the project as well
- So far everything with Denison is going well and conversations are remaining positive.
 - KML and Denison meet every two weeks

KML Studies

- CNSC asked about the study that was provided because it reads as though there may be additional information to come
 - Walter indicated that the study shared is a preliminary document and once the EIS is released then they will update the document
- Walter shared that KML also completed Bush and Harvest Study years ago and although the study is dated, it still holds true to the community.
- Walter shared the digital mapping that Pinehouse completed in 2018 with CNSC at the meeting on his screen
 - Mapping was completed using GIS software and showcases different land use patterns and historical/cultural sites

UMM ROR Update (December 15th)

- Walter/KML wants to better understand the Commission process, specifically the UMM ROR in December, at a future meeting
- KML wants to go over the ROR report and then we can discuss in more detail. Has been thinking a lot about how he intends to present to the commission, and CNSC staff offered to talk through it further as he considered how he wants to do this. Also suggested that he focus on concerns with the process, given concerns with the indefinite licence request and how that limits opportunities to come in front of the Commission.
 - Konrad (CNSC) spoke a little about the ROR process and purposes of the Commission meeting – the ROR is meant to be an opportunity for the Commission to assess a proponent's activities during a facility's lifecycle prior to a licensing renewal. It is also a tool to disseminate information about the facilities to the public and Indigenous Nations and communities

- KML wants to submit something to CNSC on the communities broader concerns on uranium (more discussion to be had)
- Concerns noted for future RORs included:
 1. Potential economic leakage and ensuring KML has an opportunity to recover from systemic economic leakage
 2. Lack of foundational education in schools
 - KML recognizes that additional work is necessary for the community to obtain opportunities within the uranium industry – which is currently the largest employer in the region. This requires long term resources to build capacity within younger generations of the community. Currently, transference of knowledge is temporary and limited to specific topics presented by industry, which is insufficient for the community.
 - KML also notes that there is limited resources available and resources need to be allocated for specific purposes, limiting the KML's opportunity to target the community's needs
 3. Indefinite licensing proposed by Cameco for Rabbit Lake, Key Lake and McArthur River Operations
 - KML feels that this would deprive them of the opportunity to evaluate and present whether a facilities' presence in conjunction with new proposed projects could impact the community – this could infringe upon UNDRIP's requirement of participation of Indigenous peoples in a meaningful way
 - Research project from University of Calgary studying trade, the Canadian Northern Corridor concept, and how transportation corridors through mid/northern Saskatchewan impacted communities

Actions:

- CNSC will send around a monthly meeting invite to allow for a more consistent meeting schedule (completed)
- CNSC and KML to discuss a presentation on the EIS in preparation for the Public Comment Period

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
 Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Walter Smith](#)
Cc: [Nickolet, Sydney](#); [Yen, Wish](#); [Froess, Ryan](#); [Gorzowski, Konrad](#); [Billie Jo Natomagan](#);
Subject: RE: KML-CNSC Meeting Minutes - November 10th, 2022
Sent: 2022-11-17 5:00:00 PM

Apologies, sent with only the partial CC list. Sending again, and including everyone else.

From: Way, Jessica
Sent: Thursday, November 17, 2022 5:43 PM
To: Walter Smith <wsmith@kineepik.ca>
Cc: Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Subject: KML-CNSC Meeting Minutes - November 10th, 2022

Hi Walter,

Please see below for the meeting minutes from our call last week.

Have a great weekend!

Jes

Kineepik Métis Local (KML)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

November 10, 2022 – 11:00am-12:00pm CST

Attendees: Walter Smith, Konrad Gorzowski, Ryan Froess, Sydney Nickolet, Jes Way, Wish Yen

Topics Discussed:

UNDRIP

- Walter believes that the CNSC is moving at a good pace for the rights bearing community (Pinehouse) when it comes to UNDRIP
- Walter requires more time to digest the CNSC UNDRIP response as it was shared with Nations one hour prior to this meeting
- Walter reiterated the need to build capacity for the KML
 - KML continues to evaluate capacity and allocation of resources
 - CNSC would be happy to have additional conversations regarding this concern and Ryan has mentioned that new ISRD funds may be able to support KML in this area

Wheeler River Project EIS

- Conformity review is underway and CNSC is anticipating the public comment period to begin on November 21st, should Denison pass the conformity review
- CNSC can help KML direct their focus when reviewing the Denison EIS. This would include providing KML with the sections that would directly impact them to help focus KML's review

(Action for CNSC)

- Province of Saskatchewan's EA is a parallel process with the CNSC EA and the Province does not defer to CNSC
- KML is speaking to the Province to learn more about their process for the Denison EIS review
 - KML will accept the Province's fast-track grant for their review
 - KML expresses concern around the uncertainty of the Province of SK EA process and how the KML can participate and identify their concerns and valued components to the Province
 - Province of SK defers the consultation to the proponent – as a result, Denison is engaging and consulting on behalf of the provincial Crown
 - Walter has expressed concern that the Province of SK should be protecting KML's rights – the community continues to raise environmental concerns for exploration and mining. Should CNSC have oversight of explorations? This seems to be a loophole for proponents

UMM ROR Update (December 15th)

- Walter has a meeting with Ryan on Tuesday morning in Saskatoon about getting KML's presentation ready for the ROR
- CNSC & KML discussed longer licensing and which sites will be discussed at the ROR
 - Walter wants to mention the legacy of Pinehouse within KML's intervention for the ROR and the discrepancy in capacity and resources
 - Extending licensing terms removes the opportunity for KML to raise concerns and for KML to participate and impact Cameco's operations should there be disagreements
 - KML still doesn't feel comfortable that studies demonstrate sufficient protection from 40 years of uranium mining
 - KML continues to feel disparity between the community
 - KML voices that community health is impacted by the mining – not by mining or environmental impacts, but by the presence of the mines resulting in the loss of language and culture within the community
 - KML can trace the loss of language to the introduction of roads to the mines
- CNSC mandate is to disseminate information, ensure protection of environment and health of peoples and to engage with Indigenous peoples and the work currently underway between CNSC and KML is only the start of our relationship – we hope to continue building and strengthening this relationship

Actions:

1. CNSC can share the relevant sections for Walter to focus his review of the Denison EIS for our next meeting

From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#);
[Cheyenna Hunt](#); 'jerry.bernard@erfn.net'; 'nvp.mike@sasktel.net'; 'wsmith@kineepik.ca';
'bnatomagan@kineepik.ca'; 'glenmccallum@mns.work'; 'Brent Laroque'; 'Shannon Landrie-Crossland';
'garrett.schmidt@yathinene.com'; 'shea.shirley@yathinene.com'; 'kevin.mercredi@outlook.com'; b-
tsannie@hotmail.com; csayazie@hotmail.com; d.powder.nhsr@sasktel.net; 'd.classen@sasktel.net';
Bcc: 'chief1@birchnarrows.ca'; 'norma.catarat@brdn.ca'; 'receptionist@mltc.net';
'claire_larock@hotmail.com'; 'karenbird@pbcn.ca'; 'tmerasty@pbcn.ca'; 'bmerasty@pbcn.ca';
'cooksearson@lrib.ca'; 'jtsanniejr@pagc.net'; 'gchristiansen@lrib.ca'; 'cheyenna.hunt@desnedhe.com';
'karenbird@pbcn.ca';
Subject: RE: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins
Sent: 2022-11-21 3:42:00 PM

Sorry all- Correction, the deadline for comments is **February 18th 2023**.

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Sent: Monday, November 21, 2022 3:34 PM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

Hi Everyone,

In update to my email below, Canadian Nuclear Safety Commission (CNSC) staff undertook a conformity review of Denison's draft environmental impact statement (EIS) submission, and we have now deemed the submission complete. The letter to Denison has been posted to the Canadian Impact Assessment Registry (the Registry), as has the draft EIS and executive summary, along with all appendices and technical support documents.

The CNSC is now seeking comments during a 90-day public comment period on Denison's draft EIS, for the proposed Wheeler River Project. For the purposes of this comment period, the draft EIS and supporting documents can be accessed by visiting [All Records](#) for the project. The EIS can also be found under Key Documents, located on the main Registry page for the [Wheeler River Project](#), as well as here: <https://iaac-aeic.gc.ca/050/evaluations/document/145552>

The draft EIS provides an analysis of the project's potential environmental effects and measures to mitigate those potential impacts. The public comment period gives Indigenous nations and communities, members of the public, and government departments and agencies an opportunity to submit their views in writing to the CNSC on the adequacy of the information presented in the EIS, as measured against the [Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012](#) (the Guidelines), and on the technical merit of the information presented. The Guidelines provide direction to the proponent and identify the information that is required in the EIS.

Written comments must be submitted by **February 18, 2023** to:

Jes Way
Environmental Assessment Officer
Email: wheelerRiver@cnscccsn.gc.ca

All comments on the draft EIS will be posted on the Registry in the language in which they were received. If you have any questions about this or anything else, please don't hesitate to reach out to our team.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Sent: Monday, October 24, 2022 11:28 AM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Received - Conformity Review Underway

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Walter Smith](#)
Cc: [Froess, Ryan](#); [Nickle, Sydney](#); [Yen, Wish](#); [Gorzkowski, Konrad](#);
Subject: Wheeler River - Sections of the EIS for Review
Attachments: [E-DOCS-#6927429-v2-EIS_sections_for_KML.XLSX](#)
Sent: 2022-12-01 10:08:00 PM

Hi Walter,

As per our discussion today, here is the excel sheet with the list of sections and pages in the Wheeler River EIS and Appendices that make reference to KML, or topics that you may be interested in reviewing. You are obviously welcome to comment on any topics that are of interest, but hopefully this can save you some time and help guide your review.

Minutes to come.

Thanks for your time today, and have a good evening!

Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Walter Smith](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#); [Gorzowski, Konrad](#);
Subject: KML-CNSC meeting minutes - December 1, 2022
Attachments: [Wheeler River - Sections of the EIS for Review](#)
Sent: 2022-12-07 4:28:27 PM

Hi Walter,

Please see the meeting minutes from our call last week. Sorry that I am behind in sending these. Also attached is the breakdown of the sections we highlighted for KML's review, as already shared.

Thanks,

Jes

Kineepik Métis Local (KML)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

December 1st, 2022 – 1:00pm-2:00pm CST

Attendees: Walter Smith, Konrad Gorzowski, Sydney Nickolet, Jes Way, Ryan Froess

Topics Discussed:

KML/Denison Consultation Process Meeting:

- KML had a meeting with the community regarding Denison and the consultation process.
- Walter is going to go through all duty to consult matters that KML has. Tallying specific concerns, such as number of flights, impacted Caribou, etc. Becoming very consensus focused.
- The community still has misconceptions around duty to consult and the process.
- KML is not supportive of the Saskatchewan First Act
 - KML is going to be providing a letter to Saskatchewan (Jim Lemay)
 - The community wants to be included in industrial development
- Ryan mentioned the CNSC long-term engagement fund that may be able to help out the community with capacity and education.

Wheeler River Project EIS:

- CNSC has pulled out pages of the EIS that would be relevant to KML for their review with the deadline of **February 18th, 2023**.
 - CNSC will share it with Walter
- KML is still working with Denison on a contribution agreement. The conversations have been evolving to date.
- KML wants to have a meeting in mid-late January regarding the EIS where KML can ask any questions that may have come up on the EIS review.
 - Jes suggested this meeting include Denison and CNSC given that there may be questions for both parties on the EIS.
 - KML would like an hour and a half meeting time
 - Jes is meeting with Janna next week and will mention it to her for awareness
 - Walter will keep CNSC posted with a date for this meeting
- Our next meeting date would work better to be held on January 4th, 2023 because Walter is available then
 - Jes will look at everyone's schedules and send out an invite for some time that day
- Denison will need to incorporate what they heard in revised versions of the EIS once the comments are in

Actions:

1. Jes- Send out an invite for our next meeting for Wednesday January 4th, 2023 (complete)
2. Jes- Share the excel sheet with Walter on the priority pages of the EIS for KML (complete)
3. Jes- Raise potential January meeting with Janna (Complete)

From: [Way, Jessica](#)
To: [Walter Smith](#); [Nickolet, Sydney](#); [Froess, Ryan](#); [Yen, Wish](#);
Cc: [Billie Jo Natomagan](#); [Greg Ross](#);
Subject: RE: KML-CNSC Monthly meeting minutes - January 5th, 2023
Sent: 2023-01-31 1:03:21 PM

Hi Walter, thank you for your detailed response!

These are things we are hoping to discuss in our upcoming meeting, but appreciate your clarification on the field test incident. We will note this for the record.

I also wanted to follow up on your response related to meeting in person in March. You mention Tuesdays and Thursdays are better due to travel – would Thursday afternoon March 9th work for you? I'm not sure if you would be staying overnight or driving back, so if morning is better, we can do that instead.

For the meeting, we are thinking about 2.5 to 3 hours, at the CNSC office in Saskatoon – please let me know what your preference would be (afternoon or morning).

Thanks,

Jes

From: Walter Smith <wsmith@kineepik.ca>
Sent: Saturday, January 21, 2023 10:34 AM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Cc: Billie Jo Natomagan <bnatomagan@kineepik.ca>; Greg Ross <GRoss@kineepik.ca>
Subject: RE: KML-CNSC Monthly meeting minutes - January 5th, 2023

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Thank you for this email. I have reviewed the feedback to the action items. I will request meeting with Sask Highways to host the conversation on Industrial road and emergency response on the road. We would like to have a conversation with Transport Canada about TDG and Navigations Protections Act so that we can start learning about how we can assist in these processes when incidents occur. We also need to understand the inspection process so we will require training. Yes we can make the March dates work Tuesday and Thursdays are better for travelling arrangements.

We have received funding for Rabbit Lake, Key McArthur relicensing and I am developing the workplan for that project. Kineepik will focus on how ROR can mitigate concerns and not focus specifically on length of licensing. We do need to understand how UNDRIP and Section 35 protected rights are considered in a licensing application for a rights bearing community such as Kineepik/Pinehouse.

One correction in the notes are the Denison did communicate with us and we responded to the community by presenting to an Elder group. The field test incident was presented as part of another public meetings. (We felt it the significance was minor in scope of the overall test to host a full public conversation about it specifically.) This was our decision as a community.

As I review the conversations which I do appreciate, There is a great need for Kineepik/Pinehouse to review our current capacity and develop a long-term training process that will bring a higher-level understanding of the nuclear Industry to the community residents of Pinehouse. We strongly feel that this is a multiparty responsibility that includes Industry, Regulators, Government permitting agencies, Government training agencies and we the people of Kineepik/Pinehouse. We will look into the Indigenous Skills and Employment Training Program, and we have in the past secured some programming with them and the Saskatchewan Education once we have developed a training framework for the community.

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: January 18, 2023 6:22 PM
To: Walter Smith <wsmith@kineepik.ca>
Cc: Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Manickum, Katherine <katherine.manickum@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: KML-CNSC Monthly meeting minutes - January 5th, 2023

Hi Walter,

Please see below for the meeting minutes from our meeting a couple of weeks ago. Sorry we are so delayed! We do have some follow ups for you though, related to action items and other discussions we had. This is all at the bottom of the email – I've highlighted in blue.

Something else that I didn't raise in our last meeting, but I am hoping to be in Saskatoon the week of March 6th. It could be the early part or second half of the week. Monday, Tuesday, Thursday or Friday would be ideal, if possible. I realize the Cluff Lake Mine hearing is the week before this, but the timing of the week we are proposing is fairly strategic. It would give us two weeks

to review the EIS comment submissions prior to meeting, and two weeks after this to finalize our submission to Denison. I hope there is a day this week that could work to meet with you in person, in or around Saskatoon.

In terms of topics, we'd like to discuss the comments that will be submitted by KML, as well as talk more about 5(1)(C) impacts, particularly related to what is identified in the comments and the valued component study provided by KML. Further, we could start our discussion on the rights impact assessment work that we will need to start working on (what is coming, how this will look and timelines).

Please let me know what you think on the week of March 6th, and if you have any questions, concerns or edits for any of the minutes or follow up actions below.

Thanks,
Jes

Kineepik Métis Local (KML)-CNSC Hybrid Meeting Minutes – Denison Mines Wheeler River Project

January 5, 2022 3-4PM CST

Attendees: KML- Walter Smith (in office), CNSC- Sydney Nickolet (in office); Konrad Gorzkowski, Katherine Manickum, Jes Way and Wish Yen (virtual)

General Updates

- CNSC:
 - Introduced Katherine, who will be supporting on the EA, from Indigenous and Stakeholder Relations Division
 - EIS Technical Review underway, so no major updates to provide (will be completed mid-March)
 - Reminder that public and indigenous comments are due on February 18th
- KML:
 - Public Meeting held in Pinehouse December 15th to discuss several topics:
 - KML has sent a letter to the province to request additional supports for projects in Northern Saskatchewan (Denison and other projects, including exploration)
 - KML has reviewed the EIS from an economic standpoint – KML has highlighted every activity that the community got to participate in and might be concerned about and are compiling a document
 - 63 People in attendance, and was open to everyone in the community
 - Capacity Concerns:
 - Greg Ross is currently working with KML on Denison EIS with a focus on economy and building capacity
 - KML capacity is based on industry and regulators engagement requests, not based on needs of the KML
 - David Cates from Denison was in Pinehouse in December – were 300 people in the room for the meeting, where a presentation was given and the newly established relationship was discussed
 - Cameco and Orano went to Pinehouse for outreach
 - Layoffs were prioritized concerns

Valued Ecosystem Components (Re: EIS Comments from KML to come)

- When think about capacity, Walter is struggling with responsibility piece- doesn't seem to fit anywhere. Who is responsible for education of the people? PFP is supportive of this, and seems like a hybrid model is evolving with province; but only of interest to organizations when necessary (CEAA 2012, SK EA legislation)
- KML currently employs a hybrid education model – language, land use and culture preservation
- Industry and Pinehouse community culture are inseparable at this time

1. Feedback from KML community

- KML reiterates that participation in industry demonstrates that KML's culture is inseparable from nuclear at this point, as well as impacted by industry
 - When discuss within community, everyone in the room has been involved in nuclear- shows community is part of nuclear industry
 - Still trying to unpack what this means for the community; not a negative, but should be less of "us versus them" and more of a "we"
- Province of SK is very hands off for engagement while CNSC is more engaged
 - KML appreciates that CNSC is actively engaging and promoting outreach
- A key priority to KML is that agencies and regulators are communicating on projects
 - CNSC would be happy to engage with agencies and other federal departments targeting concerns that KML have raised related to the Wheeler River project – for example, Department of Fisheries and Oceans for population of fish
- KML is still grappling with identifying impacts of industry projects to the community
 - KML wants to be able to respond to emergencies in places where they hunt and eat all of the time, with regards to the highway
 - In addition to lack of trust for proponents, there is also a lack of trust in existing organizations run by community members
 - Related to capacity, want members to have more information and knowledge (as there is a relationship between capacity and knowledge, and trust)
 - New mining method could be expanded to other projects, need more education in Pinehouse now, while process is occurring – until members have collective knowledge and a solid understanding of what this

process in, including with dealing with incidents when occur

- How will CNSC respond to tailings underground for the NexGen project?

2. Highway 914

- Concerns about Denison's project impacts the highway, and cumulative impacts of increasing highway activity
- What causes a road to become an industrial road? The local road was built because of the presence of industry – why isn't the road built to an industrial standard?
- When look at cumulative effects of highways, need to look holistically at transportation on the roads; now adding transport by Denison, on narrow old roads, in winter especially; transportation of equipment and materials is all very heavy; if an accident involving a transport truck, could have major impacts
- The last update on the extension was from the Province of SK in December 2021
 - Request to review the 10 year old draft EIS as part of the consultation process
 - Have not heard from the Province of SK since
- How does CNSC regulate the transportation of nuclear materials?
 - When Denison submits a licence application, transportation aspects will be reviewed and would be part of the licencing conditions
 - CNSC staff work with ministry of transportation in SK
 - There is oversight on the transportation of the materials
 - KML has raised concern that there is not more stringent oversight on the highway
- As the corridor expands – the community wants to grow as the industry grows
 - KML wants to know how to evolve economically to support industry
 - Of concern to entire North, and the ability to deal with emergencies and incidents- want to have the capacity to deal with these
- Jes to follow up with Transport Canada for clarification on their role in such projects (**Action**)

3. Accidents and malfunctions

- KML requests additional information of the project – building capacity within the community to understand an incident and how they are cleaned up
- Ensure the community is informed of incidents and concerns as soon as they occur – KML to share the following sentiments with Denison
 - When a leak occurred at Denison, it was well communicated by Denison to KML leadership, but the community was not updated
 - Knowledge of the actions that will be taken should be provided to the community – STEM knowledge should be provided to the community so that information is not "magic"
- Proponent should bring forth issues with the method so the community can have a full picture
- KML wants to build strategies to collaborate with Denison on the cleanup process to ensure economic growth for the community and to ensure cleanup is to the community's standards
 - Managing emergencies to ensure safety concerns and perceived contamination are addressed – formalized land-use first response should be part of the process
 - More training to KML so the community can be helpful to people using the road as well – economic growth for the community could stem from this
- Who will be responsible? Community? Regulators?
- Community trust – currently the capacity and STEM knowledge transfer is not sufficient for the community to understand and trust the process
 - Community has chastised Denison for trying to make light of concerns – example: slightly acidic – use the term acidic (provide accurate information and build on it after)
- Pinehouse's culture is heavily impacted by project – but still wants projects to move forward, so it is necessary to quash the rumours

Budgeting

- Discussed CNSC approach of obtaining deliverables prior to providing PFP funding for that work – CNSC Staff suggested that should be able to partially reimburse in advance for Wheeler Public and Indigenous Comment period funding (**Action**)
- KML currently in budgeting cycle
- Submitted application for the Cameco Key, McArthur and Rabbit Lake License Renewals PFP – Walter hasn't heard back (**Action**)

Action Items

- Funding follow ups (Sydney):
 - Future funding available through the new budget for capacity building – to discuss further with KML
 - **Update:** CNSC is able to come and present on the new capacity fund at one of our monthly meetings in the spring when the fund is announced.
 - Funding advance-for PFP on Denison and funding release for licensing (complete)
 - **Update:** Adam Zenobi (CNSC) sent out an email to Walter regarding advances on PFP funding last week
 - Funding for Cameco license renewals (complete)
 - **Update:** Emails for the funding went out on Monday
- Jes to follow up with Transport Canada (TC) regarding highway 914 and the extension:

- **Update:** Jes had a call with Transport Canada last week to talk about concerns raised by KML, and to understand their process. As part of TC's review of the EIS, they will assess whether there is a need for an Emergency Response Assistance Plan (ERAP) from Denison, under the *Transportation of Dangerous Goods Act* (TDG), and Transport Canada would approve this plan. (No answers on Industrial road) Request a meeting with Sask Highways.)

In terms of their assessment, TC really focuses on transport of dangerous goods to and from the site. They will be looking at whether yellow cake would be transported at any point in the process and focus on any shipments of dangerous goods on the highway (responsibility falls under both TC and province of SK). I believe she said that **TC conducts inspections on highways themselves**, and would be on site for assessment/inspections of shipments leaving the site. That being said, they don't really have any involvement with transport outside of this. The other act that they enforce is the Navigations Protections Act, as it relates to water crossings (bridges) or if they themselves have provided federal funding for a road. If there is interest from yourself to speak with TC directly, we could try to arrange to have someone come speak to one of our meetings to answer additional questions. (This information is sufficient and does not answer many of the cumulative effects on the road from all Industry.)

I did mention the highway expansion project, but again it comes down to the Navigations Protections Act, transportation of dangerous goods, and projects that they fund. My contact was not aware of anything going on in SK that they were currently involved in, regarding highway projects. I have also reached out to the province to see if they can provide clarifications on where things are at, what's next, etc.

- **Other Update:** Support for capacity building:
 - We didn't take an action on this but we did do some reaching out to counterparts at other federal departments to see what kinds of funding/support programs might be out there that KML might want to look into. One that was identified was the ISET program: [Description of the Indigenous Skills and Employment Training \(ISET\) Program-Canada.ca](#). This could be a program worth looking into, related to some of the bullets we noted under the "Feedback from KML Community" section in the minutes above. Happy to discuss further, and will let you know if we are able to dig anything else up on this. We've heard lots of great ideas from you on building capacity, knowledge and expertise, so maybe this could be leveraged to help along this path.

From: [Yen, Wish](#)
To: [Way, Jessica](#); [Froess, Ryan](#); [Nickolet, Sydney](#); [Gorzowski, Konrad](#); [Walter Smith](#);
Cc: Manickum, Katherine
Subject: 2023-02-01 - February KML-CNSC monthly meeting minutes
Sent: 2023-02-09 9:19:00 AM

Good morning Walter,

Please find the monthly meeting minutes for February 1st below.

Thank you,

Wish Yen (she, her, elle)

Environmental Assessment Officer | Agente en évaluation environnementale
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
wish.yen@cnsccsn.gc.ca | 343.553.2233



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February 1st, 2023 2-3PM EST

Attendees: Walter Smith, Konrad Gorzowski, Ryan Froess, Katherine Manickum, Jes Way, Wish Yen

March monthly meeting

- CNSC would like to discuss public comments submitted by KML to ensure we are submitting a comprehensive package to Denison
- Walter indicated that he likely would not be able to attend over the proposed dates (week of March 6th), but proposed alternative weeks
 - Given CNSC's schedule for submission of IRs to Denison and planned travel, it would be difficult to adjust, but CNSC proposed meeting for a longer period of time in the following weeks on a similar agenda virtually instead.
 - Walter proposed that we could likely meet with Mike and Billie Joe in person

KML issues and concerns

- How will perceived impacts be managed from a regulatory lens by CNSC?
 - Indigenous consultation that has more meaningful context in recent years. Historically things have happened to use regardless of what wishes and thoughts were, as well as capacity
- "Collateral effect"
 - Community members within KML are currently recovering from loss of language and community culture from historical industry development (detailed context available in the Kineepik Valued Ecosystem Component report)
 - Current KML education system is not as evolved to provide industry ready workers from within the KML community
 - KML has identified the lack of fundamental industry knowledge as safety and environmental hazard to the KML community, impacting perceived risks by community members

- There could be community pushback on projects due to lack of understanding of the technology of projects
 - KML also raises concerns that when incidents occur at a facility, community members do not have capacity to resolve or manage these incidents, disseminate the information and reassure the community - have to rely on external expertise
 - KML path forward
 - Build a co-managed education system to protect language and identity, while incorporating industry knowledge with support from the government and industry
 - Westernization of the education system for the community to build capacity to ensure members can assess projects with confidence (western capacity while maintaining identity)
 - KML wishes to develop an Indigenous regulatory authority for industry and move towards self governance (see block voting as something they can leverage, having seen it used in other provinces)
 - Become a vanguard for the process to ensure KML has a voice in the regulatory process for all industries impacting the community
- **“Triggered capacity”**
 - KML raised concern that there’s no options in delaying industry as there are no mechanisms to prevent industry from moving forward and implementing projects, no veto
 - KML is currently measuring community capacity that has been diverted to industry while displacing capacity that could be used for healing, improving, and building the community (results in disengagement from community healing and putting focus on community needs; in some ways harming or ignoring community, displacing energy into other things)
 - CNSC has a new capacity funding program meant to help build capacity and to support culture camps, but additional resources, such as the [First Nation Power Authority](#) are also available
 - KML currently meets with CNSC regularly and experiences the level of engagement it does due to the EA that is underway; trying to figure out how to maintain capacity building (time, energy, money) post-EA process
 - Industry should also be helping to build KML capacity
- KML wants to ensure that “collateral effect” and “triggered capacity” are considered when assessing the Wheeler River EIS
- KML is concerned that once the EA and licensing processes for the Wheeler River projects are completed, the community will no longer be engaged by CNSC
 - Although monthly meetings will not take place for the Wheeler River project, CNSC does want to build a long-term relationship with KML, with budgets established for outreach and engagement activities (e.g. annual RORs, IEMP, long term engagement activities)
 - CNSC is currently working towards building a foundation for conversations for UNDRIP
 - CNSC is aiming to establish an Indigenous advisory council to support these conversations and to advise the Commission
- **Highway 914**
 - KML is concerned by increased cumulative road use by industry - Denison is anticipating 18 trucks/day in addition to Cameco’s 32 trucks/day
 - This information isn’t adequately assessed in the EIS
 - This road requires more investment from industry and the Province of SK to ensure safety of road users
 - Lack of maintenance of the road puts the young drivers in the community at risk
 - Portable CB radios are needed for safety

- Note, this was strongly recommended to the CNSC as an investment for travel on northern highways
 - High beams from trucks are blinding drivers
 - Delays for travelers and educators due to need to pull over for semis and trailer trucks – this also increases risk of getting stuck in a ditch
- Community uses the road to send 67 children out of Pinehouse to provide them better education; for medical incidents and to purchase vehicles to drive on this road
- Additional traffic also pushes animals further from the original hunting grounds used by KML
 - Pinehouse's hunting practices and cultural camps could be impacted by moose leaving the area due to increased traffic
- Province of SK has indicated that the highway extension project is on hold and if it is re-triggered, considerable consultation would be needed due to the amount of time lapsed for the project
- **In-situ mining**
 - Community is concerned about the new mining method and how it will impact the area. This has two implications
 - Elders are frightened of the new technology and mining
 - Youth are discouraged and may be prevented from actively engaging in employment
 - Relates to lack of capacity, don't understand it (perception of "magic")
 - Pinehouse is anticipating a 20-30 year process of growing and building capacity

KML-Denison relationship

- Discussions are focused on collaboration agreement models with four pillars: environmental protection, community funding agreement, economic model and 1 additional pillar
 - KML wants Denison to focus on being a mining company which will provide economic opportunities to the community
- CNSC has advised that KML could bring up discussions around capacity building, mitigation measures and monitoring with Denison

KML-Province of SK

- KML is concerned that the duty to consult by the Province of SK being transferred to the proponents
- No opportunity for transference from the province due to the lack of engagement

Community sentiments

- Community needs to do more research on how uranium is impacting the community and the results from colonialism
- KML doesn't want to slow/stop industry because they also rely on industry for job opportunities, but would rather have more control on resources and how they're expended/harvested
- Aim to build a Centre of excellence for uranium with industry and government support – but will need capacity

First Nation Power Authority

- Funding programs available to KML
- Participant funding for power generating stations → product that powers the NPGS come from SK → Pinehouse wants to NPGS

Newest SMR project proposed in Canada (Sask Power)

- Will undergo Impact Assessment under IAA 2019
 - More stringent process, but will analyze both positive and negative impacts of projects

New Darlington SMR

- March 20th: Due date for comments on the [Updated Plant Parameter Envelope Report](#) and [Environmental Impact Statement Review Report](#)
 - The project has already undergone the panel review and a rigorous assessment under CEEA 1992, but review of the new technology proposed and whether it meets the bounding envelope of the project are going to be assessed

Action Items

- CNSC to share potential dates and times for in-person March meeting on Tues or Thurs with Mike and Billy Joe
- CNSC to share provincial update on the Highway extension projects – we are sharing info in road extension project ?/its not a project we are involved in.

-----Original Appointment-----

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>

Sent: October 27, 2022 4:23 PM

To: Way, Jessica; Froess, Ryan; Nickolet, Sydney; Gorzkowski, Konrad; Yen, Wish; Walter Smith

Cc: Manickum, Katherine

Subject: CNSC-KML Monthly Meeting

When: February 1, 2023 2:00 PM-3:00 PM (UTC-05:00) Eastern Time (US & Canada).

Where: Microsoft Teams Meeting

Hi All,

Getting this in the calendar for a regular monthly meeting.

Thanks,
Jes

—

Microsoft Teams meeting

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—

From: [Walter Smith](#)
To: [Way, Jessica](#); [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#);
Cc: [Billie Jo Natomagan](#); [Mike Natomagan](#); [Greg Ross](#); [AJ Felix](#);
erinduff@sasktel.net; [Carolanne Inglis-McQuay](#);
Subject: RE: Reminder: Wheeler River Project Public and Indigenous Comment
Period
Attachments: [Denison Statement - EIS Final Submission - February 17.pdf](#)
Sent: 2023-02-17 8:34:11 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

Please find attached Kineepik response to the Denison Environmental Impact Statement.

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: February 17, 2023 7:23 PM
To: Walter Smith <wsmith@kineepik.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Billie Jo Natomagan <bnatomagan@kineepik.ca>
Subject: FW: Reminder: Wheeler River Project Public and Indigenous Comment Period

Hi Walter,

As a courtesy, I wanted to send a reminder that tomorrow is the deadline for comments on the Wheeler River draft EIS. I'm sure you are well aware, but if you have any questions or concerns, please don't hesitate to reach out.

Hope all is well, and have a great weekend.

Jes

From: Wheeler River Project - Projet de Wheeler River
Sent: Wednesday, January 18, 2023 7:34 PM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Reminder: Wheeler River Project Public and Indigenous Comment Period

Hi Everyone,

Just sending a reminder that if you would like to provide comments on the Wheeler River Environmental Impact Statement, they are due on February 18th, 2023. Please feel free to share with anyone that would be interested in providing a submission during this comment period.

If you have any questions about the information in these emails, please don't hesitate to contact me at the information below.

Thanks,

Jes Way
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Way, Jessica
Sent: Monday, November 21, 2022 3:42 PM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>

From: Wheeler River Project - Projet de Wheeler River <Wheellerriver@cnscccsn.gc.ca>
Sent: Monday, November 21, 2022 3:34 PM
To: Wheeler River Project - Projet de Wheeler River <Wheellerriver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

Hi Everyone,

In update to my email below, Canadian Nuclear Safety Commission (CNSC) staff undertook a conformity review of Denison's draft environmental impact statement (EIS) submission, and we have now deemed the submission complete. The letter to Denison has been posted to the Canadian Impact Assessment Registry (the Registry), as has the draft EIS and executive summary, along with all appendices and technical support documents.

The CNSC is now seeking comments during a 90-day public comment period on Denison's draft EIS, for the proposed Wheeler River Project. For the purposes of this comment period, the draft EIS and supporting documents can be accessed by visiting [All Records](#) for the project. The EIS can also be found under Key Documents, located on the main Registry page for the [Wheeler River Project](#), as well as here: <https://iaac-aeic.gc.ca/050/evaluations/document/145552>

The draft EIS provides an analysis of the project's potential environmental effects and measures to mitigate those potential impacts. The public comment period gives Indigenous nations and communities, members of the public, and government departments and agencies an opportunity to submit their views in writing to the CNSC on the adequacy of the information presented in the EIS, as measured against the [Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012](#) (the Guidelines), and on the technical merit of the information presented. The Guidelines provide direction to the proponent and identify the information that is required in the EIS.

Written comments must be submitted by **February 18, 2023** to:

Jes Way
Environmental Assessment Officer
Email: wheellerriver@cnscccsn.gc.ca

All comments on the draft EIS will be posted on the Registry in the language in which they were received. If you have any questions about this or anything else, please don't hesitate to reach out to our team.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division

Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>

Subject: Wheeler River Project EIS Received - Conformity Review Underway

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Yen, Wish](#)
To: [Walter Smith](#)
Cc: [Way, Jessica](#); [Froess, Ryan](#); [Gorzowski, Konrad](#); [Nickolet, Sydney](#);
Subject: 2023-04-05 KML-CNSC monthly project meeting minutes
Sent: 2023-04-25 1:41:00 PM

Good afternoon Walter,

Please find the monthly project meeting minutes for April. I apologize for sharing them so late, but please don't hesitate to reach out if anything in the minutes are missing or incorrect.

Thank you and have a wonderful week,

Wish Yen (she, her, elle)

Environmental Review Officer

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnscccsn.gc.ca | 343.553.2233



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Kineepik Métis Local (KML)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

April 5, 2023 12-1PM CST

Attendees: Walter Smith, Ryan Froess, Sydney Nickolet, Jes Way, Wish Yen and Konrad Gorzowski

Wheeler River Project Updates

- Public comments on the Wheeler River Project (available through IAAC)
 - [Kineepik Métis Local #9 and the Northern Village of Pinehouse](#)
 - [Lac La Ronge Indian Band \(Ty Roberts\)](#)
 - [Canadian Nuclear Association](#)
 - [English River First Nation\(SVS\)](#)
 - [Birch Narrows Dene Nation](#)
 - [Peter Ballantyne Cree Nation](#)
 - [Ya'thi Nene Land and Resource Office](#)
 - [Métis Nation of Saskatchewan](#)
 - [Prince Albert Grand Council](#)
- Denison will be responding to the comments (they are currently aiming for a June re-submission date)

KML Community feedback

- The conversation that consistently comes up related to the Wheeler River Project within the community is related to the roads
 - The road is not well maintained due to mining and forestry projects, the community does not believe this was sufficiently addressed in Denison's EIS
 - KML has also raised this concern with the SKMoE who has not addressed this concern

KML-Denison engagement

- Denison brought 8 staff to participate in the Polar Bear Plunge to build community engagement and relationships
- Denison continues to maintain transparency with communities by sharing information related to spills with KML
- Denison has been able to provide more personal approach to engagement and outreach despite being on a smaller scale with Cameco

Key Lake incident

- Remediation methods led by CNSC were shared with KML
 - CNSC's response and the community's response are not collaborative due to lack of STEM knowledge
 - As previously discussed, collaborative effect and triggered capacity within the community is preventing full engagement from the community with the CNSC
- Regulatory process and costs for the program was shared by Cameco
- Community inquiries were related to ammonia and uranium releases and the time of contaminant travel to Wolf Lake from the facility
 - Cameco indicated that it's not possible to track uranium travelling to Wolf Lake
 - Community is concerned as to how the uranium release will impact Pinehouse
 - The concern is shadowed by the triggered capacity of the community as Pinehouse members are unable to understand the science behind this incident
 - Focus comes back to cultural change and building knowledge and understanding of math and science
 - Expect a discussion related to education struggles at the re-licensing hearing

Cameco re-licensing hearings: Key Lake, McArthur River and Rabbit Lake Operations

- The relationship between KML and Cameco was traced back 50 years and the growth of the community as a result of this relationship has been slow
 - KML has had limited interactions with Cameco – when there is outreach from Cameco, KML is told how they will be engaged, rather than collaboratively building engagement and outreach
- April 24th is the intervention due date for the re-licensing hearings
 - Cree and Dene translation will be available at the hearings on June 7th and 8th
 - Mike from the KML will be speaking in Cree
- Pinehouse has their own radio station – would it be of interest for Adam or someone from UMMD to participate in a radio interview?
 - It is an exclusively Cree broadcast

- Pinehouse has the capacity to engage and bill the process through their communication's team, but CNSC is unable to pay for advertising. CNSC would be happy to participate in an interview, but can't complete advertising through the radio station

CNSC outreach and engagement trip

- CNSC will be participating in the KML Elders Gathering in June and is also planning to engage on the UMMD ROR for 2022 and on on-going EA projects
- CNSC is requested to introduce ourselves and participate in the activities
 - It would build on CNSC-KML relationships if CNSC camped with community members

Action Items

- Ryan will follow up with Louise to ensure Cree and Dene translators are available

From: [Yen, Wish](#)
To: [Walter Smith](#)
Cc: [Froess, Ryan](#); [Nickolet, Sydney](#); [Gorzowski, Konrad](#); [Way, Jessica](#);
Subject: 2023-05-30-CNSC to KML monthly project meeting minutes
Sent: 2023-08-09 7:34:00 AM

Good morning Walter,

I believe the May monthly meeting minutes weren't shared, please find them below for your review.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnscccsn.gc.ca | 343.553.2233



Government
of Canada

Gouvernement
du Canada

Kineepik Métis Local (KML)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

May 30, 2023 12-1PM CST

Attendees: KML – Walter Smith, CNSC – Ryan Froess, Sydney Nickolet, Jes Way and Wish Yen

CNSC EA Process updates

- Denison plans to submit responses to the information requests at the end of June 2023
 - Denison has indicated they have been meeting with Nations to address specific IRs
- Next Steps: CNSC will conduct a 30-day completeness check, if the completeness check passes, a 90-day technical review will take place
- Public comments tables still underway and will be going through approvals process prior to posting on the Registry

What We've Heard Report

- CNSC is currently revising the report and will be sharing it back with KML
- The document has been saved as a confidential document, both the study and WWHR will remain confidential and ATIP requests will be shared and reviewed by KML prior to any responses

KML-Denison Relationship

- KML is waiting for feedback on the EIS
- Currently KML and Denison are collaborating on a partnership program
- KML is excited to host Denison's participation for the Elder's gathering
- [Saskatchewan](#) MLA, [KML](#) and Denison will be joining for a site visit on June 14

McArthur River, Key Lake and Rabbit Lake Hearings

- Mike will be opening with 5 minutes and Walter will be presenting the slides
- Key and McArthur lifespans
 - McArthur is 24 years
 - Key Lake storage facility is a minimum of 24 years for McArthur's materials and there could be additional lifespans based on storage requests for other facilities

Action Items

- Ryan to verify that the translator is a Y Cree translator

From: [Nickolet, Sydney](#)
To: [Walter Smith](#)
Cc: [Levine, Adam](#); [Froess, Ryan](#); [Yen, Wish](#); [Way, Jessica](#);
Subject: KML WWH Report - for feedback
Attachments: [E-DOCS-#6948676-v3-2022-12-11-TKLUS-KMLP_What_We_ve_Heard_Report.DOCX](#)
Sent: 2023-06-16 2:16:00 PM

Good afternoon Walter,

Over the recent months, CNSC staff have been implementing a new practice of developing “What We Heard” reports, in response to Indigenous Knowledge studies. The purpose of this document is to summarize what CNSC staff understood from KML’s Value Ecosystem Components Study, for discussion purposes. We welcome comments from KML on how we have captured this information and would be happy to meet and discuss further if needed. Once finalized, CNSC would work with KML to ensure that the information captured is accurate for sharing with CNSC subject matter experts to ensure a fulsome review of future iterations of the Wheeler River draft EIS.

We are seeking feedback on the report by July 31st, 2023.

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

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Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la
patrie des Métis*



To
A
c.c. Executive Management Committee Members

Clare Cattrysse, Adam Levine, Neil Babcock

From
De Patrick Burton
Director
Uranium Mines and Mills
Division
Nana-Owusua Kwamena
Director
Environmental Review
Division

Subject
Objet Pinehouse Elders Gathering and Denison Site Tour – Trip Report for ISRD, ERD & UMMD: Pinehouse,
SK June 19th-22nd, 2023

Security Classification - Classification de sécurité
Unclassified

File - Référence
e-Doc #7077863

Your File - Votre référence

Date
July 6th, 2023

Tel. No. - N° de tél.

Location: Proposed Wheeler River site, SK; Pinehouse, SK

Dates: June 19th-22nd, 2023

CNSC Participants: Sydney Nickolet, Policy Officer, ISRD; Torin Takala, Project Officer, UMMD; Konrad Gorzkowski, Project Officer, UMMD; Wish Yen, Environmental Review Officer, ERD; Patrick Burton, Director, UMMD; and Nana-Owusua Kwamena, Director, ERD

Event: Pinehouse Elders Gathering organized by the Kineepik Métis Local (KML) and Denison Wheeler River Site Tour

Background: CNSC staff from ISRD, ERD and UMMD attended a Denison Wheeler River Site Tour as well as participated in the Pinehouse Elders Gathering in Pinehouse, SK. The site tour focused on Denison's work to-date in developing their site, and a description of their future plans. The Pinehouse Elders Gathering was an opportunity for CNSC staff to meet with Elders and community members, participate in traditional activities and try traditional foods. CNSC staff were able to engage local community members with information on the role of the nuclear regulator in Canada. The CNSC set up a display booth which included outreach materials, a sample optically stimulated luminescence dosimeter, several artifacts provided by the CNSC Lab, radiation meters, pamphlets and CNSC-branded giveaways.

Highlights:

- CNSC staff participated in activities that were happening at the Elders Gathering such as relay races; preparation of traditional foods; watching moose hide tanning; watching traditional wood carving and canoe preparation; sacred medicine teachings; watching the powwow and helping with dinner clean up. CNSC staff slept in tents provided by the community, which in conjunction with CNSC staff's participation in the relay race, left a very positive impression.
- Many attendees were aware of the CNSC, and were interested in the proposed Denison Wheeler River Project and where the CNSC is at in the EA and licensing processes. There was also interest in operating sites within KML's traditional territory including

Cameco's Key Lake and McArthur River operations; historic sites near Uranium City were also mentioned.

- CNSC staff had discussions with Glen McCallum, President of the Métis Nation – Saskatchewan (MN-S), Walter Smith, Environment, Education and Training Manager for KML, Mike Natomagan Mayor of Pinehouse, SK and President of KML, Jim Lemaigre, Saskatchewan Member of the Legislative Assembly for Athabasca and David Cates, CEO of Denison Mines, as well as with many community members.
- CNSC staff toured Denison's site, including the three wells associated with their 2022 field test and production well components which Denison had displayed on the surface. During the 2022 field test, Denison recovered nearly 7 tonnes of uranium oxide, which they store in solution under a Nuclear Substances and Radiation Devices licence.
- Photos can be found at Q:\ADD PHOTOS HERE\2023-06-19 Denison Pinehouse

Lessons Learned:

- The CNSC branded fishing lures were a popular giveaway item; however, the sizing of the lure was too small for northern Saskatchewan. When ordering the next batch of fishing lures, a larger size should be ordered.
- The weather during the Elders Gathering featured a heavy downpour for most of the evening. CNSC staff should ensure that we are well equipped for the weather for outside events including proper attire and protection of outreach materials.
- Items to identify CNSC staff at these events, such as shirts or hats, would be beneficial. Most of the other representatives had branded clothing representing their organization so having CNSC branded clothing would bring in more interest by attendees and distinguish CNSC staff from industry. Some CNSC staff that attended the Elders Gathering had CNSC inspection shirts but having specific general outreach branded clothing would have been beneficial for community members to recognize who we were at the event.
- The Pinehouse Elders Gathering was a very large and well attended event. Accommodations in the area were booked up months in advance. When participating in the future, CNSC staff should look into accommodations months in advance due to limited accommodations in the area and high demand.
- Fire dangers must be considered for summer trips to northern Saskatchewan. The CNSC team was guided by advice from Denison and from KML leadership, and had prepared to back out of the trip rather than take excessive fire risks.
- Renting pickup trucks was a must given the hundreds of kilometers on gravel roads.

Next Steps:

- It is recommended that CNSC staff continue to attend similar events to continue to learn about Indigenous culture in northern Saskatchewan, to build relationships, and to continue on our path towards reconciliation. Glen McCallum, President of the MN-S invited CNSC staff to attend Back to Batoche Days in July 2023, CNSC staff are evaluating whether we can attend.



Figure 1. CNSC staff demonstrating a contamination survey meter to church exchange students from BC



Figure 2. CNSC staff participating at the 2023 Pinehouse Northern Elders Gathering



Figure 3. CNSC staff observing moosehide tanning

From: [Nickolet, Sydney](#)
To: [Walter Smith](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Way, Jessica](#);
Subject: RE: KML WWH Report - for feedback
Attachments: [E-DOCS-#6948676-v4-2022-12-11-TKLUS-KMLP_What_We_ve_Heard_Report - including KML edits 07-19-23.docx](#)
Sent: 2023-07-25 5:10:49 PM

Good afternoon Walter,

Thank you for taking the time to meet with us last week regarding the What We Heard Report. Above I have attached an updated version with the edits we discussed, please let me know if there are any other edits you wish to make. I have also included the notes from our conversation below. Please don't hesitate to reach out if anything in the notes are missing or incorrect.

I also wanted to let you know that me and my colleague Torin were able to make it out to Batoche on Thursday last week. Unfortunately, you weren't out there yet but we were able to chat with some Elders and community members at the Pinehouse tent and we also got to indulge in the wonderful lunch 😊 I hope the rest of the weekend at Batoche went well!

Hope you have a great rest of your week!

Sydney

[Kineepik Métis Local \(KML\)-CNSC Meeting Minutes – What We Heard Report Discussion](#)

July 19, 2023 2:30:30 PM CST

Attendees: Walter Smith, Sydney Nickolet, Jes Way, Konrad Gorzkowski

Discussion on What We Heard (WWH) Report from the KML VEC Statement

- CNSC explained:
 - WWH is a summary of the report KML sent, in order to share with SMEs on our end – will help with their review, understand KMLs concerns, VCs and other factors that align with KML and the project.
 - Open for comments, edits – can take and look through and provide comments via email after we share these edits.
- Feedback from KML:
 - Figure 1 Map: KML noted that they are having conversations about this map and how to better present land use.
 - e.g. Patunak did a map, not sure how they created their map. Looking at it, looks like they just estimated outer boundaries. KML will be creating a map that includes traditional territory, but will be more precise with total area that use – more precise. CNSC mentioned that it would be beneficial to see the map, once created, if KML is willing to share.
 - Section 3 Valued Components:
 - 3.1- Want to add a statement to clarify that referring to STEM Education, specific to nuclear (e.g. health sciences, financial management, community development)
 - 3.2- Road safety is very primary in terms of concerns from a community perspective (came up at last consultation meeting). Idea of all of this economy passing by on the road, past KML territory. It's making the community anxious and not just road safety; it's about economy driving through the municipality – trucks passing, wonder where they are going and where they coming from. It's not just safety, but presence and transport through.
 - 3.3- Pinehouse is a fishing community, so fishing should be reflected in traditional lands and resources (commercial fishing for traditional purposes). Fish types: walleye/pickerels, jackfish, trout and whitefish.
 - Section 4.0 Concerns:
 - Other topics are of concern, but they are having conversations about them which makes KML feel like they are less of an issue (employment, for example).
 - KML asked that concerns be listed in order of importance (preference). Perpetuated language and cultural loss bullet moved to be the last bullet. No need to number, happy with bullets.
 - Revise to loss of use instead of access limitations – more legalese
 - Traditional harvesting – change to traditional harvesting activities, and include hunting, fishing, plant medicine gathering, traditional supplies such as trees, wood, add note about fishing
 - Section 5 Proposed Next steps:
 - Want to include ROR process in WWH report – check and balance with industry, regulators. KML really appreciates this process and where we are taking it, what we can do with it. This is a process where they have an opportunity to make KML concerns known. Sydney will change this around and add this in there.
 - Add bullet about STEM – this relates to EARMF, as it is a big concern within community that they don't get to be involved in this monitoring process. Wondered if this is something that could be fixed through the new funding program, talk about what they need to do to start own monitoring process.
 - Concerns about traffic, effects further down the line, effects at job site
 - STEM capacity to not just take samples, but start analyzing samples, using western scientific methods.
 - Sydney noted that this could also be considered in long term relationship building discussions, in a future possible TOR.

Other Discussion:

- Province not engaging with KML, flying in face of UNDRIP principles. With work that KML has to do, only so much capacity and don't want to waste time. More of industry specific concerns.
- Feasibility study report by Denison:
 - VEC document changes if feasibility study report changes, as it talks about the mill, gryphon deposit, road from McArthur to Cigar – if can't upgrade the mill, could want to apply to build a mill, which changes concerns (i.e. If license is approved for Phoenix deposit, and then Gryphon, with tailings, leaching, and a mill to become a mill). Need to talk to Denison about his, haven't yet. These would be aspects that were not included in early process.
 - Gryphon deposit is several years away – 5 or 6 years into the process.
- Fission:
 - Following a new process, interested in what this will be and as a community, need to be educated on new process. Sooner they can understand it, better they can be involved if the process comes to them.
 - CNSC staff noted that this follows our non-designated projects process, and it's not exactly a new process, but the difference is that the project is not subject to a federal EA/IA act (CEAA 2012 nor IAA 2019).
 - Jes noted that will talk to her team member involved in this project, and invite him to a future meeting to discuss
 - Through capacity funding, KML want to learn about CNSC and by better understanding non-designated projects process (i.e. for Fission), it's an opportunity to learn.
 - Not hearing from the province on this and KML noted the statement "nothing happens to us, without us."
 - Want more information from the province, and develop capacity in new processes (e.g. Provincial regulations and the EA)
 - Interested in provincial funding, KML will be following up
 - Sydney noted that there might be an opportunity for funding through stream three. She will see if Adam is available to talk about funding through stream three at a future meeting.

Next Steps:

- Sydney updated as discussed, but will review after and finalize to send back for review.
- KML is welcome to make other edits as needed and send back to CNSC, or let us know if we can finalize
- Jes to arrange to have Fission environmental review lead to join a future meeting
- Sydney to follow up with Adam on stream three funding, and see if he can present in a future meeting on what Stream 3 covers.

From: Nickolet, Sydney

Sent: June 16, 2023 2:17 PM

To: Walter Smith <wsmith@kineepik.ca>

Cc: Levine, Adam <adam.levine@cnsccsn.gc.ca>; Froess, Ryan <ryan.froess@cnsccsn.gc.ca>; Yen, Wish <wish.yen@cnsccsn.gc.ca>; Way, Jessica <jessica.way@cnsccsn.gc.ca>

Subject: KML WWH Report - for feedback

Good afternoon Walter,

Over the recent months, CNSC staff have been implementing a new practice of developing "What We Heard" reports, in response to Indigenous Knowledge studies. The purpose of this document is to summarize what CNSC staff understood from KML's Value Ecosystem Components Study, for discussion purposes. We welcome comments from KML on how we have captured this information and would be happy to meet and discuss further if needed. Once finalized, CNSC would work with KML to ensure that the information captured is accurate for sharing with CNSC subject matter experts to ensure a fulsome review of future iterations of the Wheeler River draft EIS.

We are seeking feedback on the report by July 31st, 2023.

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nicolet@cnsccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nicolet@cnsccsn.gc.ca
New Phone Number: 343-596-9556

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Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la patrie des Métis*

From: [Way, Jessica](#)
To: [Walter Smith](#); [Damien Georges](#);
Cc: [Froess, Ryan](#); [Yen, Wish](#);
Subject: RE: CNSC Wheeler River EA Update - Additional August 2023 Completeness Check and Next Phase of EIS Technical Review
Sent: 2023-09-01 3:29:55 PM

Will do, thanks for highlighting Walter. Have a great weekend!

Jes

From: Walter Smith <wsmith@kineepik.ca>
Sent: Friday, September 1, 2023 12:08 PM
To: Damien Georges <dgeorges@kineepik.ca>
Cc: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Subject: FW: CNSC Wheeler River EA Update - Additional August 2023 Completeness Check and Next Phase of EIS Technical Review

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Please include Damien Georges in all future emails and meeting invites. Thank you.

From: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Sent: Thursday, August 31, 2023 3:49 PM
To: Wheeler River Project - Projet de Wheeler River <Wheellerriver@cnsccsn.gc.ca>
Subject: CNSC Wheeler River EA Update - Additional August 2023 Completeness Check and Next Phase of EIS Technical Review

Hi Everyone,

This email is to provide another update on the Wheeler River Environmental Assessment (EA) Process.

On August 18, 2023, Denison Mines Corp. (Denison) re-submitted responses to information requests (IRs) for the proposed Wheeler River Environmental Impact Statement (EIS), to the Canadian Nuclear Safety Commission (CNSC). CNSC staff conducted a completeness check and determined that outstanding IRs have passed completeness and supporting submissions are sufficient to proceed to the next phase of EIS Technical Review. More information can be found in the [August 28, 2023 letter to Denison](#), and [completeness check table](#).

The 90-day technical review has since begun, and will conclude by November 27, 2023. The focus of this review will be the following documents, all posted to the Canadian Impact Assessment

Registry:

- [Wheeler River Project: Denison's Responses to Information Requests from the Federal and Indigenous Review Team \(August 18, 2023\)](#)
- [Update to Indigenous Engagement Activities for the Wheeler River Project - draft EIS](#)
- [Wheeler River Project Commitments Table - draft EIS](#)

Please don't hesitate to let us know if you have any questions.

Sincerely,

Wheeler River Project Team

wheelerriver@cnscccsn.gc.ca

Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

From: [Nickle, Sydney](#)
To: [Walter Smith](#)
Cc: [Froess, Ryan](#); [Levine, Adam](#); [Yen, Wish](#); [Wylie, Doug](#); [Gorzkowski, Konrad](#); [Way, Jessica](#);
Subject: CNSC & KML September 6th Monthly Meeting Notes
Sent: 2023-09-11 5:31:07 PM

Good afternoon Walter,

Thank you for taking the time to meet with us in-person last week. See below the notes from that meeting and please let me know if you have anything further to add. Looking forward to seeing you in-person on September 20th for the ROR engagement!

CNSC & KML Monthly Meeting – September 6th 1pm-3pm CST:

Participants: Walter Smith, Damien Georges, Adam Levine, Sydney Nickolet, Ryan Froess, Wish Yen, Doug Wylie and Konrad Gorzkowski

Non-Designated Projects:

- CNSC is partaking in the Provincial process as a technical expert for the Fission project
 - The only environmental assessment process that will apply to the CNSC, but the CNSC will still perform its own environmental review of the project under licensing
- CNSC licensing process does still apply and still consists of the rigorous standard
- Terms of reference has been submitted by Fission and CNSC provided comments on that
 - Has been pretty quiet since then on formal involvement
 - Still early days- waiting on the EIS to come in under the provincial process and should come in late this year or early next year. CNSC will provide comments on the EIS for the province and Fission from a technical capacity
- Fission wanted to harmonize the process to potentially meet some of the CNSC requirements as well
 - CNSC is not sure how that will look currently as that process has not begun yet
- Is Fission the first non-designated project?
 - Yes for CNSC
 - CNSC had another one come in recently the ARC 100 project (SMR project) in New Brunswick
- What is the requirement for the tonnage for uranium mines and mills?
 - 2500 tonnes per day is the threshold, for a new uranium mine, before falling under the Impact Assessment Act
 - Tonnage is set pretty high and would be a pretty big mine that would trigger the IAAC
 - McArthur wouldn't trigger IAAC as an example
- No construction, operation or decommissioning before a CNSC license is issued
- ACTION:** CNSC to send Walter the list of the requirements for what triggers an impact assessment (complete)
 - This is the [Physical Activities Regulations \(justice.gc.ca\)](#), that outlines the threshold for what projects trigger the Impact Assessment Act. More specifically, sections 20-23 speak to Uranium mines and mills, and other nuclear facilities are sections 26-29.

Funding Opportunities:

- KML was approved for the Stream 1 funding opportunity to support Damien
- Damien will be going on a tour to Denison with high school students and educators from Pinehouse in the near future
- CNSC can support bringing education to the community on who the CNSC is and how they differentiate from the proponent
 - Cigar Lake waste rock pile as an example to help how to explain how the CNSC regulates the industry
 - This can be done in the form of a workshop or community meeting
- Can Damien shadow an inspection?
 - CNSC is currently setting up a process for this. We piloted this program at the Whiteshell Laboratory site with MMF
 - ACTION:** CNSC to take this information back to UMMD and see if it is possible for Damien to shadow an inspection
- KML is implementing an industrial grade 13 program as the academic grade 13 program wasn't as successful
 - Hoping this program will get students ready for the workforce and support KML's vision for STEM in the community
 - About 250k per year for what the program would cost and looking for funding from industry and government to support
- Stream 3 of CNSC funding would allow for KML and CNSC to host a workshop in the community to talk through the CNSC's role
 - i.e. CNSC supported a WSTEM workshop for Indigenous girls in Peterborough, ON. CNSC is hoping to make these workshops an annual thing and looking to do this in Saskatchewan in the coming years.
 - Can also support for technical equipment under Stream 3 as well including tablets, headsets, etc. up to \$5000 dollars –
 - ACTION:** CNSC to send Stream 3 application along to apply for IT equipment for classroom (complete)
 - Another example is supporting meeting room equipment to help Nations to participate in CNSC hearings virtually

Denison Update:

- Denison has resubmitted their EIS submission package and they have passed the CNSC completeness check
- The Federal Indigenous Review Team is undergoing the technical review phase and will finish reviewing responses to the IRs towards the end of November
- CNSC will be sharing the What We Heard report with CNSC internal technical review staff this Friday so they will have that information when conducting their technical review
- KML is concerned that there are not enough pullovers on the highway to pull over around the trucks on the road

- CNSC emphasized that this should be directed to the Province and CNSC can raise these concerns with Transport Canada
- KML is meeting with Denison next week to discuss Gryphon deposit, the road, and feasibility study
- KML was informed by Denison on the most recent spill- KML feels that Denison does a good job of informing them
- Denison is potentially planning a community outreach in Pinehouse sometime around October 23rd-26th
- KML would appreciate CNSC's participation in these outreach events
- Denison did submit their initial license application at the beginning of July but are currently waiting for more documents from Denison

ROR Discussion:

- CNSC has been mandated by the Commission to include and track issues and concerns that are brought up throughout the ROR's by Indigenous Nations. This year CNSC has piloted a new program where we are tracking these concerns that are brought up and will be included in the CMD.
- The CMD will be available to the public on September 14th and you will see in the appendixes the issues that have been tracked with Indigenous Nations including KML from past ROR's
- CNSC is interested in possibly doing a northern tour on the ROR in future years and are curious if that is something that would be valuable to the community?
 - KML said that the ROR can also be mentioned at meetings with the community at other points as well like in October/November community meetings
- CNSC is looking to provide the ROR data in infographics at future ROR's in order to get the information out to the communities earlier so that the data is readily available before the CMD
 - Walter think that is a good idea
- CNSC is looking into doing a mega ROR in future years which would include the entire fuel cycle minus the power plants in a full report and presentation for ROR
 - Still in the works and no confirmation on if this will go through or not
- KML is looking to bring between 4-6 people for the engagement session on September 20th

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnsccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
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From: [Nickolet, Sydney](#)
To: [Walter Smith; Damien George](#);
Cc: [Froess, Ryan; Yen, Wish; Way, Jessica](#);
Subject: CNSC & KML Monthly Meeting Minutes - October 4th
Sent: 2023-10-10 3:36:15 PM

Good afternoon Walter and Damien,

Please see below the minutes from our monthly meeting last week. If you have any comments, questions or edits to the notes just let me know! Thanks 😊

CNSC & KML Monthly Meeting – October 4th 12pm-1pm CST:

Participants: Walter Smith, Damien George, Jes Way, Ryan Froess and Sydney Nickolet

Funding:

- Walter is very happy with the results of the ISCF Stream 1 funding
- Walter has a meeting next week with Saskatoon audio/visual to look at equipment to make it easier for having meetings in the community
 - KML put in an application through Stream 3 for funding for technical equipment and is waiting to hear back

UMM ROR:

- Walter and Damien are planning to come in-person to the December ROR in Gatineau
- Damien liked the engagement session but some of the content went overtime
- Ryan is planning to follow up with the Nations on UNDRIP and can bring in Blair and Adam into a future meeting with discuss where those conversations are at
- Patrick shared the contact that set up with STEM workshop in Ontario and Walter is interested in reaching out to her to try set something up like that in Saskatchewan

Denison October Trip:

- Walter is meeting with Denison next week to fill in the agenda for the October meeting in Pinehouse
 - Land users in the afternoon then public meeting in the evening
- Walter wants to find other ways to collect data from the community because most are too shy to speak up at the public meetings
 - KML wants to see how transference is going on with the land users
- CNSC is looking to see how the concerns that KML put forward for the Denison project and how is that being validated with the community and land users
 - Could be a side meeting without Denison in the room
 - Make sure CNSC is separate from Denison so that the community and land users do not think they are the same
- CNSC would also like to speak with KML about the concerns on the EA for Denison to ensure there are no gaps and that everything has been addressed prior to the hearing
 - This side meeting can be a precursor to meeting again later on down the line

- The biggest concern is the road and it's hard to navigate that concern since it is under another jurisdiction
- KML has invited MN-S to this meeting
 - Brent will be there as well as people from the consultation team
 - They are coming to observe how KML does these meetings to take that information back to their team as a teaching moment
 - President Glen McCallum may be in attendance at the meeting as well
- KML is planning to build in a lot of their issues into the IBA they are planning to sign with Denison
- Walter wants to create a balance for the amount of information that is shared to the community during the October meeting because usually it is too much information and KML doesn't want it overloaded
 - Timelines is important to share and where the opportunities are for the project – **Action for CNSC Meeting Prep**
- Salman from UMMD will be there and can share anything on licensing
 - Walter thinks licensing will be too much but it will be good to share where we are at in the process and what the next steps are (high level)
 - Wants an example of when CNSC would "flex their muscles" meaning that when would CNSC stop a process or pause a process until Denison looks into it the issue – **Action for CNSC Meeting Prep**
- Walter will ensure there are enough rooms for everyone to stay since there will be people from CNSC, the Province, Denison and MN-S in attendance

Actions:

- CNSC to prepare diagrams to speak to timelines if needed during the meeting, and be ready to speak to what would cause the CNSC to stop/pause the EA

Best,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
 Canadian Nuclear Safety Commission
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From: [Nickolet, Sydney](#)
To: [Walter Smith](#); [Damien George](#);
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Yen, Wish](#);
Subject: KML & CNSC Monthly Meeting - Notes
Sent: 2023-11-10 12:47:57 PM

Good afternoon Walter and Damien,

See below the notes from our meeting last week. Please let me know if you have any edits or comments on the notes. Hope you both have a great long weekend!

CNSC & KML Monthly Meeting – Nov 1st 12pm-1pm CST

Participants: Damien Georges, Wish Yen, Ryan Froess, Sydney Nickolet and Jes Way
-Walter wasn't able to make it to the meeting today as he is on holidays

Denison Community Meetings – Last Week:

- KML really appreciated the meetings and thought they went over really well
 - There was one meeting in the afternoon with land users and then a community public meeting in the evening
- Denison did do a good job with their presentation and KML stayed behind to talk to community who may not have been comfortable with speaking directly to Denison
- Damien and Chelsea went door to door with invitations for the community meeting with land users and found that was a good way to get the word out
 - KML also put up flyers around the community for the public event
- Community meeting had about 65-68 people in attendance which was a great turnout!
- MN-S was in attendance for the public session and observed the meeting as well
- Feedback from the community that the words were too high level that were included in the presentation (more so for Denison) but Denison did a good job of pivoting away from technical language
- Translator was there for Cree speakers
- Next time CNSC will ensure there is a presentation prepared which would be approx. 10 slides but CNSC was able to create a presentation in time for the meetings
- Radio was a great way to get the word out for the meetings and would be great to have CNSC on the radio next time

Denison Project Update:

- CNSC is currently working on compiling all of the reviewers comments on the IR's and will be getting back to Denison by the end of the month
- CNSC mentioned the remaining PFP funds for KML's review of the draft EIS
 - Damien is going to fill out the FFR and get back to Adam Zenobi by the end of the week
- CNSC mentioned the concern from KML regarding inhibited use of culture and Cree of community members who may be hired to work at the Denison site and to confirm if the concern has been validated by KML
 - Damien is going to raise this with Walter

ROR:

- Walter and most likely Damien will be attending the ROR in-person on December 14th

ACTION: KML will share with CNSC a calendar of upcoming events

ACTION: Damien will raise with Walter the question regarding practicing culture and Cree at the Denison site and how those discussions have been going with Denison. Denison indicated that they having been working with KML on this concern

ACTION: CNSC will update the meeting notification and resend an invite for December (complete)

Thanks,

Sydney Nickolet (she/her/elle)

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From: [Nicolet, Sydney](#)
To: [Walter Smith](#); [Damien George](#);
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Yen, Wish](#); [Gorzowski, Konrad](#); [Carolanne Inglis-McQuay](#); jswitzer@denisonmines.com;
Subject: KML & CNSC Monthly Meeting Minutes - Dec 5th
Sent: 2023-12-08 12:18:00 PM

Good afternoon Walter and Damien,

See below the notes from our monthly meeting earlier this week. I have also copied in Janna and Carolanne as they were part of the discussion on Tuesday. Please let me know if you have any edits or comments on the minutes!

Hope you both have a great weekend and safe travels next week for the ROR 😊

KML & CNSC Monthly Meeting – December 5th 1pm-2pm CST

Participants: Ryan Froess, Sydney Nicolet, Jessica Way, Konrad Gorzkowski (CNSC), Walter Smith, Damien Georges (KML), Carolanne Inglis-McQuay and Janna Switzer (Denison)

Denison was invited to this meeting by KML

KML Update:

- KML invited Denison so everyone is on the same page and where the project is at in terms of process and the relationship
 - Opportunity for KML to state how pleased they are with where the relationship has been going with Denison
 - Denison has also provided forward thinking for KML
- KML is pleased with the new system where they have input into the process and documentation (EIS)
 - Given the opportunity to provide what is important for KML prior to EIS submission
- KML is thankful for the opportunity to develop the VEC statement and the importance of it for the Denison project
- Damien and Carolanne have been doing a lot of work with the youth from Pinehouse. Hoping that they can get youth initiatives started and also bring youth down for a site tour at the Denison site
 - Thinking of creative ways to get youth involved
- KML has been a willing partner throughout the process with Denison which has continued to strengthen the relationship between KML and Denison
- Walter is thankful for the CNSC capacity fund in order to bring Damien on and continue that capacity for KML
- KML is having a community meeting on Dec 6th to recognize STEM youth from Pinehouse and celebrate the successes from the community
 - Denison will be attending the event and sending a video from some of those who cannot make it

-Walter is having discussions with Mark Calette from SRC to discuss the recent announcement on micro reactors

-It is early days for CNSC but will be involved once more information is provided

ROR:

-Walter and Damien will be attending the ROR in person next week in Gatineau

-Damien will be arriving a day early and will reach out to Ryan to meet up the day before the event

-KML will discuss the relationship with Cameco and CNSC, the orders that CNSC gave and also talk about his presentation that he gave at the Saskatchewan Mining Association event.

Funding/capacity will also be mentioned during KML's oral intervention

CNSC Update:

-CNSC is tentatively planning a NEA Indigenous and Stakeholder Workshop in Saskatchewan with Indigenous women and girls happening in 2024 and will keep KML in the loop on the workshop

-FIRT has reviewed all the responses of the second submission of the IR responses

-CNSC owed a response to Denison last week but there are outstanding items from Environment and Climate Change Canada that are still under review

-There are also discussions on caribou topics needed with ECCC's Canadian Wildlife Service, but this won't hold up the submission

-CNSC will send Denison their review by end of day today

-CNSC and Denison are working together to fulfill the license application

-Denison is hoping to get those licensing documents in by mid-January

-Denison is hoping to have a final EIS by mid next year and then be before the Commission a year later

-CNSC would like to come back up to Pinehouse when the final EIS comes in and have discussions around it but more to come on that in the new year

- CNSC would also like to continue to work with KML on other initiatives in the region and continue to strengthen our relationship moving forward.

Thanks,

Sydney Nickolet (she/her/elle)

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From: [Nickolet, Sydney](#)
To: [Walter Smith](#); [Damien George](#);
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Gorzowski, Konrad](#); [Yen, Wish](#);
Subject: KML & CNSC Monthly Meeting - January 9th 1pm-2pm CST
Sent: 2024-01-12 2:31:00 PM

Good afternoon Walter and Damien,

See below the notes from our monthly meeting on Tuesday. Please let me know if you have any edits to the notes! Walter – it was a pleasure getting to work with you and I wish you all the best in your new role with Orano! Hopefully our paths will cross again in the future! 😊

-

CNSC & KML Monthly Meeting – January 9th 1pm-2pm CST

Participants: Ryan Froess, Sydney Nickolet, Jes Way, Konrad Gorzowski and Walter Smith

CNSC Update:

- CNSC has sent back our responses of the IR' to Denison in December
- Denison has flagged that some of the IR's may be a part of licensing so CNSC is having some discussions on those
- Denison is planning to resubmit responses to the outstanding IR's in January
- CNSC asked about anything that we can support the transition on for both Walter and Damien
 - Walter asked for CNSC to support Damien on any Indigenous rights information including section 35 rights, DTC, and CNSC's role. Ryan can share information with Damien on this topic and support throughout the transition including his knowledge of the north
 - Walter has asked for CNSC to copy Billie Jo on correspondence during the transition
 - Damien and Billie Jo will decide how to continue meeting with CNSC but Walter's recommendation that we switch to meeting quarterly. CNSC suggested allowing changes to the monthly meetings in 2024 i.e. providing topics to discuss each meeting like the rights impact assessment, environmental protection reviews, etc.
- December 12th is the tentative date for the 2024 UMM ROR
 - CNSC will also plan our engagement session in Saskatoon for the Fall of 2024 on the ROR
- CNSC is still waiting on one program (human performance) on the licensing side for the Denison project
 - Documents are looking good and just awaiting a few missing pieces
- Indigenous STEM event for women and girl in Saskatoon is most likely going to happen in May

KML Update:

- This week is Walters last week with KML and will be starting with Orano next week
- KML has a meeting planned with Denison for next week and Mike is aware and will be in attendance since Walter will be transitioned out by then

TOR Discussion:

- CNSC develops both a terms of reference and work plan to detail how we will work together

- Typically we do quarterly meetings with a few in-person, in the community and Saskatoon then a couple virtually
- Hoping that it would be ready to sign in the Spring so that the first order of business would be the Elders Gathering in June where we could announce it
- Walter wants to get this started before his last day on Friday

ACTIONS:

- CNSC will send around the job posting for a Saskatchewan based position on engagement when it is released
- KML to fill out the final financial report for the Denison EIS funding and get back to CNSC - Adam Zenobi sent email to Walter on Jan 9th
- CNSC will send over a draft terms of reference and workplan to KML for review (complete)

All the best,

Sydney Nickolet (she/her/elle)

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patrie des Métis*

From: [Nicolet, Sydney](#)
To: [Damien George](#)
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Yen, Wish](#);
Subject: KML & CNSC Monthly Meeting Summary - February 6th
Sent: 2024-02-09 12:25:26 PM

Hi Damien,

Thanks for meeting with us on Tuesday for our monthly touch base. Below I have included the notes from our meeting, please let me know if you have any comments or edits to the minutes!

Hope you have a good weekend, 😊
Sydney

-

KML & CNSC Monthly Meeting – February 6th 1pm-2pm CST

Participants: Ryan Froess, Sydney Nicolet, Jessica Way, Wish Yen and Damien Georges

Denison Update:

- Denison is planning to resubmit their responses to the IR's on around Feb 9th
- CNSC is currently looking at timelines and what the timeframe may look like but there is a possibility that CNSC may be doing another 90-day review of the responses
- We are down to about half of the original IR's- approx. 110 IR's to resolve
- There is a good chance that we could be headed to a final EIS within this year

Upcoming Events:

- There is interest from CNSC in having a meeting and diving into the comments on the EIS with KML and the community
 - Possibility to do this during the week of June 17th
- Elders gathering is planned for the week of June 17th- Damien will be sending around save the dates for the event
- The polar plunge is taking place in Pinehouse on March 16th
 - KML will send around the pledge form for donations for the event

Rights Impact Assessment (RIA) Discussion:

- Once there is a final EIS, CNSC will be drafting our environmental assessment report (EA)
- CNSC would like to include information from KML's studies within this report titled a right's impact assessment (RIA)
 - CNSC will work with KML on this document where CNSC will draft a few sections and share with KML for review
 - There may be more meetings taking place outside of the monthly meetings on this
 - CNSC can share a timeline document with KML

ACTIONS:

- CNSC will share a timeline document to KML for the Denison project (Jessica)
- KML will send CNSC the pledge form for donations for the polar plunge (complete)
- CNSC will send KML the information on the toxicology working group (Ryan)
- CNSC will reschedule the next monthly meeting to March 7th (complete)

Thank you,

Sydney Nicolet (she/her/elle)

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From: [Nickolet, Sydney](#)
To: [Damien George](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Way, Jessica](#); [Billie Jo Natomagan](#);
Subject: CNSC & KML Monthly Meeting Notes - March 7th
Sent: 2024-03-11 2:10:00 PM

Hi Damien,

Thanks for meeting with us for our monthly touch base meeting last week. Please see below the notes from our meeting!

CNSC & KML Monthly Meeting – March 7th 1pm-2pm CST

Participants: Ryan Froess, Sydney Nickolet, Wish Yen, and Damien Georges

- Damien wasn't able to make it to PDAC due to the weather
 - KML was planning to take 2 students to the event but it didn't end up working out
 - Will be looking at future events to attend alongside Denison in possibly May or June
- KML is hosting a career fair event for students interested in industry in May. They are currently just sorting out the dates but looking at end of May. KML will send CNSC an invitation for the event if they are interested
- Ryan and Jess are hoping to attend the Elders gathering in June but more to come on the day(s) and if they are able to attend
- KML will provide comments on ToR in coming weeks and work with CNSC to discuss next steps in future monthly meetings

Denison Update:

- CNSC has begun the 90-day technical review on Denison's responses of IR's which was submitted to CNSC in February. Denison included a revised EIS document, revised Indigenous engagement report and revised commitments table
- CNSC will be reaching out to KML regarding the rights impact assessment work that will be drafted in the coming months
 - Can discuss this more at our May monthly meeting

ACTIONS:

- Damien will invite Billie Jo to our monthly meetings moving forward
- CNSC can discuss the rights impact assessment at the monthly meeting in May
- CNSC will move our next monthly meeting to April 5th (complete)

Thank you,

Sydney Nickolet (she/her/elle)

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Canadian Nuclear Safety Commission
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From: [Nickolet, Sydney](#)
To: [Damien George](#); [Billie Jo Natomagan](#);
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Way, Jessica](#); [Gorzowski, Konrad](#);
Subject: CNSC & KML Monthly Meeting Summary - April 22nd
Sent: 2024-04-26 3:16:00 PM

Good afternoon Damien and Billie Jo,

Thanks for taking the time to meet with us on Monday for our monthly meeting. Below I have included the summary of notes from our meeting. Please let me know if you have any comments or questions on the notes. Hope you both have a great weekend!

-

CNSC & KML Monthly Meeting – April 22nd 9am-10am CST

Participants: Ryan Froess, Sydney Nickolet, Wish Yen, Jes Way, Konrad Gorzowski, Damien Georges and Billie Jo Natomagan

Denison Update:

- CNSC is finalizing the review of Denison's IR's and should be wrapping it up around May 20th
- CNSC would like to meet with Denison to discuss any outstanding IR's within the next month so they are aware on what is still outstanding and how to address them moving forward
- CNSC will be wanting to have future discussions with KML on the summary of issues and concerns tables to ensure that they have been validated by Denison and KML is happy to proceed
- Carolanne and Damien have been in discussions on next steps and setting up future meetings with land users

- Typically KML has 2-3 public meetings with Denison per year and will be setting that up again for this year

- The community meeting will probably be held within a month's time
 - KML is hoping to sign some exploration agreements during the Elder's gathering as they will have some newer exploration companies attending

TOR Update:

- KML is happy with the TOR - they have a few edits to incorporate but for the most part they were happy with the document. They will share their edits back to CNSC for review

Funding:

- The Stream 1 funding is now open and the deadline is June 15th if KML would like to apply this year. More details can be found here - [Indigenous and Stakeholder Capacity Fund.](#)

WiSTEM Event:

- KML has received the email on the WiSTEM event for the women and girls at the U of S and KML is getting applications from the students and will send those in this week

ACTIONS:

- KML will provide CNSC with the dates for the next public community meeting to see if CNSC can attend
- CNSC will let KML know if they will attending the Elders gathering this year
- KML will send over their comments on the TOR and workplan for CNSC to review
- KML will send over their career conference information as an FYI for CNSC

Thanks,

Sydney Nickolet (she/her/elle)

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From: [Nickolet, Sydney](#)
To: [Damien George](#)
Cc: [Billie Jo Natomagan](#); [Way, Jessica](#); [Froess, Ryan](#); [Yen, Wish](#); [Gorzowski, Konrad](#);
Subject: KML & CNSC Meeting Summary - May 10th
Sent: 2024-05-14 2:42:30 PM

Hi Damien,

See below the notes from our monthly meeting on Monday. Please let me know if you have any comments or edits to the notes – have a great day!

-

CNSC & KML Monthly Meeting – May 10th 1pm-2pm CST

Participants: Sydney Nickolet, Ryan Froess, Wish Yen, Jessica Way, Konrad Gorzowski, and Damien Georges

KML Update:

- KML took students up to the Wheeler River site this past week as well as taking them to Cameco sites to compare their experiences
 - On job staff gave an update of their experiences working at the sites
- Had a land user meeting this past week as well where Denison attended in person and gave the land users an update on where they are at in the process for the Wheeler project
 - Effluent questions was an highlight of the meeting and where that water will be released
 - Monitoring questions were also raised
- KML also hosted a career fair where different proponents and industry had booths there for students to view. Denison and Cameco participated

June Outreach:

- CNSC is planning to come up to the Elders gathering the week of June 17th. Participants would be Jessica, Ryan and potentially Quinn (technical expert) and Patrick (Director of Uranium Mines and Mills)
 - CNSC may possibly need one more room given the amount of people attending
 - KML has CNSC booked in for 2 suites (which includes 2 rooms each) and then one other room with 2 beds
- If possible, would be great if CNSC can get a meeting with land users around that time when they are in the community
 - KML did set one up at 10am on Thursday June 20th
- CNSC would be coming down on mid-day June 19th, spend the night then meeting in the morning of Thursday and stick around till afternoon then head back to Saskatoon
- CNSC is interested in participating in any cultural events happening at the Elders gathering

CNSC Denison Update:

- CNSC is coming up on the end of the technical review for this round (deadline is May 20th)
- CNSC is working on finalizing the review, working with SMEs to determine actions required to resolve IRs
- CNSC will be sending an email out to participants including KML with an update on where the project is at once this round is complete
- CNSC is working on the issues and concerns tables for KML and ensuring that is up to date and accurate. CNSC will be sending this over to KML when ready to ensure the information included is correct

Terms of Reference:

- KML shared comments on the workplan and Ryan will review the comments and get back to KML but Ryan didn't see the TOR in the attachment but KML will look at the TOR document and get back to CNSC on that document

ROR:

- Participant funding will be released shortly here and KML can apply for funding for the ROR. CNSC will ensure to let KML know when the PFP is ready
- ROR engagement session will probably take place mid-September and then the Commission meeting will take place mid-December

WISTEM:

- KML is sending down 6 girls for the WISTEM event next week at the U of S

ACTIONS:

- CNSC will get back to KML on their comments on the workplan
- KML will review the TOR document and get back to CNSC with their comments
- CNSC will send KML the PFP opportunity for the UMM ROR when ready

Thanks,

Sydney Nickolet (she/her/elle)

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From: [Yen, Wish](#)
To: [Froess, Ryan](#); [Nickolet, Sydney](#); [Way, Jessica](#); [Damien Georges](#);
Cc: [Gorzowski, Konrad](#)
Subject: 2024-06-06-KML-CNSC Monthly Project Meeting Minutes
Sent: 2024-06-07 11:53:27 AM

Good afternoon Damien,

Thank you for sharing the agenda for the Elder's Gathering – I'm so sad that I won't be able to attend as it looks like there will be some amazing activities! I'm sure everyone else will enjoy it 😊

I attached our meeting minutes from yesterday below for your review.

Thanks and have a wonderful weekend,

Wish Yen (she, her, elle)

Environmental Review Officer | Agente en examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

wish.yen@cnsccsn.gc.ca | 343.553.2233



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Kineepik Métis Local (KML)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

June 6, 2024 4:30-5:30PM EST

Attendees: Damien, Ryan Froess and Wish Yen

Wheeler River Project Licensing

- There are 2 more programs (out of 12) that need to complete the sufficiency check – whether all the content and topics have been provided
- Programs that have been deemed sufficient have started on technical review by CNSC subject matter experts
- This week CNSC and Denison have in-person meetings to discuss the technical review documents
 - discussions are focused on more detailed engineering aspects of the project

Wheeler River Project EA

- CNSC shared back a draft of the technical review results with Denison on May 24th, 2024
- CNSC, the FIRT and Denison currently have technical discussions scheduled this week and next to determine the path forward on IRs that are still outstanding
- As the technical review starts to move towards the next step, CNSC hopes to begin engaging KML on the Rights Impact Assessment report and work on validating the issues and concerns tables

Outreach on June 19th (Elder's Gathering)

- The rooms have been booked for CNSC staff
- Damien will share the Elder's Gathering schedule

- KML is expecting other government entities to have outreach booths set up in the arena
- It would be appreciated if CNSC could prepare a presentation on CNSC as a regulator and how we regulate, the EA and licensing processes and where we are in the process

Denison Outreach

- Denison presented on the licensing processes for the Wheeler River Project
- KML community members had concerns around the discharge location proposed by Denison as it's a fish spawning location
- Concerns were also voiced around the safety of the water and if it would be safe to drink – Denison wasn't able to alleviate everyone's concerns, so it would be good for CNSC to try to address this in the Elder's Gathering presentation

Please note that Damien will not be available June 17-18

-----Original Appointment-----

From: Froess, Ryan <ryan.froess@cnsccsn.gc.ca>

Sent: Tuesday, January 9, 2024 1:37 PM

To: Froess, Ryan; Nickolet, Sydney; Way, Jessica; Damien Georges; Yen, Wish

Cc: Gorzkowski, Konrad

Subject: CNSC-KML Monthly meeting

When: June 6, 2024 2:30 PM-3:15 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

Just realizing it looks like you didn't get this updated series.

-----Original Appointment-----

From: Froess, Ryan <ryan.froess@cnsccsn.gc.ca>

Sent: Wednesday, November 1, 2023 2:35 PM

To: Froess, Ryan; Froess, Ryan; Way, Jessica; Nickolet, Sydney; Walter Smith; Damien Georges

Cc: Gorzkowski, Konrad

Subject: CNSC-KML Monthly meeting

When: Occurs the first Tuesday of every 1 month(s) effective 12/5/2023 until 12/5/2024 from 1:00 PM to 2:00 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

Updated our CNSC -KML Denison touch base meetings to Tuesday's at 1- 2 pm for the next year.

Ryan

—

Microsoft Teams meeting

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Meeting Minutes

Date: June 20, 2024

Location: Pinehouse Community, Saskatchewan

Attendees:

CNSC Staff: Patrick B (PB), Ryan F (RF), Sam T (ST), Quinn Z (QZ)

Note Taker: Sam T (ST)

Community Members: Various

Discussion Points:

1. Introduction of CNSC and its Roles:
 - a. PB provided an introduction to the CNSC, explaining its independent commission and regulatory lifecycle.
2. Denison's Project Overview:
 - a. RF shared information about Denison's project, highlighting the Environmental Assessment (EA) timelines and stages for community input.
 - b. Current phase of the Environmental Impact Statement (EIS) technical review is delayed.
 - c. Community members raised concerns around about global warming, water loss, and the need for a secondary plan. Community member also highlighted hat they didn't get a confident response from Denison when those concerns were brought up.
 - d. Community members mentioned their lack of clarity about the "red light/green light" process for project approval.
 - e. Concerns about legitimizing community issues were raised by community members, RF highlighted that CNSC committed to addressing them through its processes.
 - f. RF highlighted the traditional knowledge policy emphasized the inclusion of traditional knowledge in the EA process.
3. Rights Impact Assessment (RIA):
 - a. RF discussed the Rights Impact Assessment, noting the need for monitoring the local fish population and the importance of independent environmental assessors on-site to build trust.
 - b. Discussed concerns about environmental monitoring, including the need for independent assessors and proper documentation of spills. Community members highlighted concern about lack of recognition of the qualification of local experts for performing independent assessments.
 - c. Lack of spill cleanup (on highways/ roads) process and historical incidents affecting safety were discussed. PB highlighted the transportation plans is provided by mines, however spills on highways are under provincial regulations.
 - d. Importance of water protection and cumulative environmental impacts were stressed by community members. Community members highlighted that water security and protection is paramount for them.
 - e. Issues with CNSC's reduced jurisdiction post-approval and provincial responsibilities were raised by community members.

- f. RF mentioned the Indigenous engagement capacity funds available to support community initiatives.
- 4. Environmental Concerns and Monitoring:
 - a. RF mentioned ongoing sampling requirements and the role of CNSC's EA team.
 - b. **Dust contamination from Cigar Lake's pad crushing operation was raised by community members, with PB promising to investigate and highlighted possibility of CNSC conducting berry sampling for contamination.**
 - c. Concerns about waste management, recycling, and the impact on decommissioning were raised.
 - i. Concerns around recycling, accumulation of various items in and around mining areas e.g. pallets, blue bins, paint bins. PB highlighted that mines are expected to minimize the waste, something CNSC can talk to SK-MOE.
 - d. Common concerns included the impact on hunting, trapping, fishing, medicinal plants, berries, and the Cree language.
 - e. Increased traffic, dust issues on roads, and interruption of harvesting activities were highlighted.
- 5. In-Situ Recovery (ISR) Process:
 - a. QZ explained the ISR process, including the depth of wells and reuse of acid by Denison.
 - b. Community members raised concerns about noise impact on caribou and the cumulative effects of mining. RF mentioned the cumulative effect assessment is in place.
 - c. The impact of upcoming mines on the environment was discussed; community members enquired - at what point the impact of other upcoming mines (for other ore bodies e.g. Gold) are assessed, is there a cumulative effects analysis in place; PB highlighting extensive sampling in conjunction with the Eastern Athabasca Regional Monitoring Program (EARMP).
- 6. General Concerns and Questions:
 - a. Community members expressed concerns about the rights of Indigenous people, particularly regarding access to areas around mines.
 - i. The temporary denial of Indigenous rights by the province was discussed. In the past the province has temporarily denied indigenous people access to areas around mines, despite the absence of any law or act permitting such denial. This restriction impacts indigenous individuals who rely on these areas for activities such as trapping, hunting, and other traditional practices. Community members highlighted that it is crucial to consider the significant effects this denial has on their rights and way of life.



Kineepik Metis Local

Box 166 • Pinehouse Lake, SK • S0J 2B0 • Canada Phone 306 884 0001 • Fax 306 884 0003

Billie Jo Natomagan
Executive Director
Kineepik Metis Local Inc.

June 25th, 2024.

Jessica Way
Project Officer
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, ON K1P 5S9
Jessica.way@cnscccsn.gc.ca

Dear Jessica Way,

Re: Support for the Wheeler River Project (the “Project”)

I am writing on behalf of Kineepik Métis Local Inc. (Kineepik) to confirm that Kineepik has entered into an agreement with Denison Mines Corp. in respect of the Project (“Agreement”). Kineepik is the primary representative of the Métis who live within the Kineepik Use and Occupancy Area, Kineepik is the Métis community closest to the Project, and Kineepik is the only Métis Aboriginal rights holder with demonstrated and substantive ties to the Project area. The Agreement provides, among other matters, for the support and consent of Kineepik for the development and operation of the Project.

Kineepik confirms that it supports the Project and intends to continue to participate in the ongoing regulatory approval processes for the Project in a manner consistent with its obligations in the Agreement.

Sincerely,

Billie Jo Natomagan
Executive Director



NORTHERN VILLAGE OF PINEHOUSE

P.O. Box 130

PINEHOUSE LAKE, SK. S0J 2B0

PHONE: (306) 884-2030

FAX: (306) 884-2021

ADMIN EMAIL: NVP@SASKTEL.NET

Mike Natomagan
Mayor
Northern Village of Pinehouse

June 25th, 2024.

Jessica Way
Project Officer
Canadian Nuclear Safety Commission
280 Slater Street
Ottawa, ON K1P 5S9
Jessica.way@cnscccsn.gc.ca

Dear Jessica Way,

Re: Support for the Wheeler River Project (the “Project”)

I am writing on behalf of the Northern Village of Pinehouse (the “Village”) to confirm that the Village has entered into an agreement with Denison Mines Corp. in respect of the Project (“Community Benefit Agreement”). The Community Benefit Agreement provides, among other matters, for substantive commitments by Denison to support the Village in developing our economic capacity, and the support and consent of the Village for the development and operation of the Project.

The Village confirms that it supports the development and operation of the Project and intends to continue to support the Project in a manner consistent with its obligations in the Community Benefit Agreement.

Sincerely,

Mike Natomagan
Mayor

From: [Nickolet, Sydney](#)
To: [Damien George](#)
Cc: [Billie Jo Natomagan](#); [Froess, Ryan](#); [Way, Jessica](#); [Yen, Wish](#);
Subject: CNSC & KML Monthly Meeting Notes - July 2nd
Attachments: [KMLP-Issues and Concerns Table for Wheeler River Project.xlsx](#)
Sent: 2024-07-05 12:15:00 PM

Hi Damien,

Please see below the notes from our meeting on Tuesday. I have also attached the Issues and Concerns table for your review and we can also walk through it at our next monthly meeting. Have a great weekend!

CNSC & KML Monthly Meeting – July 2nd 2pm-3pm CST

Participants: Ryan Froess, Sydney Nickolet, Jessica Way, Wish Yen, Damien Georges, and Gina (summer student)

-KML hired a summer student named Gina to support KML throughout the summer

Land Use Meeting in June:

- The meeting touched on the issues and concerns for the Denison Project and CNSC got to hear directly from the community and land users
- Ryan and Patrick were able to answer the questions and also put the land users in a more comfortable position on the project
- Land users seemed happy with the meeting and being invited to participate
- About 12-15 land users were in attendance

Denison EA Update:

- CNSC is still in the technical review process for the Denison EA to sort out some outstanding IR's and will be continuing until end of July
- CNSC will continue to work with KML on upcoming tasks including the rights impact assessment and issues and concerns tables

TOR:

- KML will resend the TOR to Billie-Joe for review and then get back to CNSC
- KML will send through an application for Stream 3 to CNSC regarding the conference in October

ROR:

- PFP was released for ROR and KML can apply for the funding. The deadline for the funding is July 26th
- The UMM ROR engagement session will take place on September 18th but the actual Commission meeting got pushed back to January 30th in Saskatoon

ACTIONS:

- CNSC will send through the issues and concerns table for KML to review to discuss further at our next meeting (complete)
- KML will review the TOR and get back to CNSC
- CNSC will share information on the PFP for the UMM ROR (complete)

Thanks,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission

Email: sydney.nickolet@cnsccsn.gc.ca

New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties
intéressées

Commission canadienne de sûreté nucléaire

Email: sydney.nickolet@cnsccsn.gc.ca

New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory
and Homeland of the Métis*

*Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité
6 et la patrie des Métis*

From: [Way, Jessica](#)
To: [Yen, Wish](#); [Froess, Ryan](#); [Nickolet, Sydney](#); [McKeown, Justin](#);
Cc: [Kwamena, Nana-Owusua](#)
Subject: FW: Denison Announces Signing of Wheeler River Benefit Agreements with Kineepik Métis Local #9 and the Village of Pinehouse Lake
Sent: 2024-07-11 1:02:09 PM

FYI, in case you haven't seen this.

From: denisonmines@denisonmines.mediaroom.com <denisonmines@denisonmines.mediaroom.com>
Sent: Thursday, July 11, 2024 6:33 AM
To: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Subject: Denison Announces Signing of Wheeler River Benefit Agreements with Kineepik Métis Local #9 and the Village of Pinehouse Lake

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

News Release Issued: Jul 11, 2024 (6:30am EDT)

Denison Announces Signing of Wheeler River Benefit Agreements with Kineepik Métis Local #9 and the Village of Pinehouse Lake



TORONTO, July 11, 2024 /CNW/ - **Denison Mines Corp.** ("Denison" or the "Company") (TSX: DML) (NYSE American: DNN) is honoured to announce the signing of a Mutual Benefits Agreement ("MBA") with **Kineepik Métis Local #9** ("KML"), and a Community Benefit Agreement ("CBA") with the **Northern Village of Pinehouse Lake** (the "Village"), in support of the development and operation of Denison's 95%-owned Wheeler River Project in northern Saskatchewan (the "Project"). [View PDF version](#)

KML represents the Métis members who live and practice traditional activities in the vicinity of the Wheeler River Project and the Métis residents of the Village, which is situated approximately 270 km south from the Project along provincial highway 914 and represents the closest municipality to the Project.

Executive Director of KML, Billie Jo Natomagan, remarked that ***"On behalf of KML, I am honored to announce the signing of our MBA with Denison Mines. This represents a significant step forward in our ongoing efforts to secure sustainable economic development while protecting and promoting our culture, language, traditions, and rights. Through this agreement we will continue to engage with Denison Mines to monitor and evaluate the outcomes of this partnership, ensuring that our goals of economic development, environmental stewardship, and social well-being are met."***

We appreciate the commitment shown by Denison Mines in recognizing and valuing our unique relationship with the land and resources in the Project area. This agreement signifies hope and opportunity for our community and for future generations.

I would like to extend thanks to everyone involved in the negotiation process, including our negotiation team, our elders, land users, and advisors. Your dedication and hard work have been instrumental in achieving this milestone."

Mayor of the Village of Pinehouse, Mike Natomagan, stated, ***"We are excited to share that we have been able to reach an agreement with Denison regarding the advancement of the Wheeler River project. This is a significant milestone for our community. Leaning on the experience and lessons learned from our previous agreement we were able to negotiate a truly meaningful agreement."***

This agreement is not just a document, but a testament to the strength and resilience of our community, and our commitment to sustainable community development. This partnership will bring more opportunities for employment, training and community development that will benefit our people and our future. This is a significant moment for our community and gives us hope for a brighter future. Thank you to our elders, community, and negotiations team for supporting us through this process. Tiniki."

David Cates, President & CEO of Denison, commented, "***The signing of these agreements represents another significant and important milestone for Denison and the Wheeler River project. Following the signing of a Memorandum of Understanding amongst Denison, KML, and the Village in 2017, where each party expressed a mutual interest in supporting the advancement of the Project, our team has focused its extensive engagement efforts towards building a lasting and authentic relationship of trust and mutual respect.***

KML and the Village have welcomed Denison staff into Pinehouse on multiple notable occasions over the last several years and we have gained a unique first-hand appreciation for the Métis and non-Métis perspectives and values of the community. As such, it is particularly rewarding for us to have earned the support and consent for the advancement of the Project from both KML and the Village. Thank you to all from KML and the Village that have contributed to the growth of our relationship and ultimately the completion of these agreements."

The MBA acknowledges that the Project is located within KML's Land and Occupancy Area and provides Denison with KML's consent and support to advance the Project. Additionally, the MBA outlines a shared recognition that the successful advancement of the Project can support KML to advance their aspirations for the successful social and economic development of KML, while also mitigating the risk of impacts on the local environment and KML members.

Amongst other key commitments, the MBA provides KML and its Métis members an important role in environmental monitoring and commits to the sharing of benefits from the successful operation of the project – including benefits from community investment, business opportunities, employment and training opportunities, and financial compensation. Overall, the MBA describes a jointly held vision for the future that reflects a mutual commitment to maintain an open, respectful, and cooperative relationship between Denison and KML. Importantly, the MBA defines the characteristics of the positive legacy that will be associated with the sustainable development of the Project.

The CBA acknowledges that the Village is the closest residential community to the Project by road, which relies on much of the same regional infrastructure that Denison will rely as it advances the Project. Pursuant to the terms of the CBA, the Village has provided Denison with their consent and support for the Project. Denison's commitments in the CBA are intended to help the Village develop its own capacity to take advantage of economic and other development opportunities in connection with the advancement and operation of the Project. The commitments in the CBA aim to create a long-lasting positive legacy that continues beyond the lifespan of the Project.

About KML & the Village

KML peoples are considered Woodland Cree, Woodland Dene, and Woodland Métis, although historical documents indicate that members of KML came from a diverse range of Métis, First Nations, and other backgrounds.

The Village is located within the land and occupancy area of the Indigenous people of KML. The lands surrounding Missinippi (Churchill River) watershed have been used for gathering food, shelter, and material supplies since time immemorial.

KML and the Village residents routinely enjoy significant employment and business opportunities for projects that occur in KML territory, because of their combined and collaborative efforts. Great pride is taken in the work ethic of KML and the Village, and through combined efforts with community owned businesses, recent profits have been used to build increased energy efficient housing, youth infrastructure such as a local hockey arena, and a 12-unit Elders housing facility.

About Wheeler River

Wheeler River is the largest undeveloped uranium project in the infrastructure-rich eastern portion of the Athabasca Basin region, in northern Saskatchewan. The project is host to the high-grade Phoenix and Gryphon uranium deposits, discovered by Denison in 2008 and 2014, respectively, and is a joint venture between Denison (90% and operator) and JCU (Canada) Exploration Company Limited ("JCU", 10%). In August 2023, Denison filed a technical report summarizing the results of (i) the feasibility study completed for In-Situ Recovery ("ISR") mining of the high-grade Phoenix uranium deposit and (ii) a cost update to the 2018 Pre-Feasibility Study for conventional underground mining of the basement-hosted Gryphon uranium deposit. Based on the respective studies, both deposits have the potential to be competitive with the lowest cost uranium mining operations in the world. Permitting efforts for the planned Phoenix ISR operation commenced in 2019 and have advanced significantly, with licensing in progress and a draft Environmental Impact Statement submitted for regulatory and public review in October 2022. More information is available in the technical report titled "NI 43-101 Technical Report on the Wheeler River Project Athabasca Basin, Saskatchewan, Canada" dated August 8, 2023 with an effective date of June 23, 2023, a copy of which is available on Denison's website and under its profile on SEDAR+ at www.sedarplus.ca and on EDGAR at www.sec.gov/edgar.shtml

About Denison

Denison is a uranium mining, exploration and development company with interests focused in the Athabasca Basin region of northern Saskatchewan, Canada. In addition to Denison's effective 95% interest in its flagship Wheeler River Uranium Project, Denison's interests in Saskatchewan also include a 22.5% ownership interest in the McClean Lake Joint Venture ("MLJV"), which includes unmined uranium deposits (planned for extraction via the MLJV's SABRE mining method starting in 2025) and the McClean Lake uranium mill (currently utilizing a portion of its licensed capacity to process the ore from the Cigar Lake mine under a toll milling agreement), plus a 25.17% interest in the MWJV's Midwest Main and Midwest A deposits, and a 69.35% interest in the Tthe Heldeth Tùé ("THT") and Huskie deposits on the Waterbury Lake Property. The Midwest Main, Midwest A, THT and Huskie deposits are located within 20 kilometres of the McClean Lake mill. Taken together, Denison has direct ownership interests in properties covering ~384,000 hectares in the Athabasca Basin region.

Additionally, through its 50% ownership of JCU, Denison holds additional interests in various uranium project joint ventures in Canada, including the Millennium project (JCU, 30.099%), the Kiggavik project (JCU, 33.8118%), and Christie Lake (JCU, 34.4508%).

In 2024, Denison is celebrating its 70th year in uranium mining, exploration, and development, which began in 1954 with Denison's first acquisition of mining claims in the Elliot Lake region of northern Ontario.

Cautionary Statement Regarding Forward-Looking Statements

Certain information contained in this news release constitutes 'forward-looking information', within the meaning of the applicable United States and Canadian legislation, concerning the business, operations and financial performance and condition of Denison. Generally, these forward-looking statements can be identified by the use of forward-looking terminology such as 'potential', 'plans', 'expects', 'budget', 'scheduled', 'estimates', 'forecasts', 'intends', 'anticipates', or 'believes', or the negatives and/or variations of such words and phrases, or state that certain actions, events or results 'may', 'could', 'would', 'might' or 'will' 'be taken', 'occur' or 'be achieved'.

In particular, this news release contains forward-looking information pertaining to Denison's current intentions and objectives with respect to, and commitments set forth in, the MBA and CBA; the results of, and estimates, assumptions and projections provided in, the technical report for Wheeler River and the interpretations and expectations with respect thereto; development and expansion plans and objectives for the Project; and expectations regarding its joint venture ownership interests and the continuity of its agreements with its partners and third parties.

Forward looking statements are based on the opinions and estimates of management as of the date such statements are made, and they are subject to known and unknown risks, uncertainties and other factors that may cause the actual results, level of activity, performance or achievements of Denison to be materially different from those expressed or implied by such forward-looking statements. For example, the modelling and assumptions upon which the plans for Midwest are based may not be maintained after further work is completed. In addition, Denison may decide or otherwise be required to discontinue testing, evaluation and other work if it is unable to maintain or otherwise secure the necessary resources (such as testing facilities, capital funding, joint venture approvals, regulatory approvals, etc.). Denison believes that the expectations reflected in this forward-looking information are reasonable but no assurance can be given that these expectations will prove to be accurate and results may differ materially from those anticipated in this forward-looking information. For a discussion in respect of risks and other factors that could influence forward-looking events, please refer to the factors discussed in Denison's Annual Information Form dated March 28, 2024 or subsequent quarterly financial reports under the heading 'Risk Factors'. These factors are not, and should not be construed as being, exhaustive.

Accordingly, readers should not place undue reliance on forward-looking statements. The forward-looking information contained in this news release is expressly qualified by this cautionary statement. Any forward-looking information and the assumptions made with respect thereto speaks only as of the date of this news release. Denison does not undertake any obligation to publicly update or revise any forward-looking information after the date of this news release to conform such information to actual results or to changes in Denison's expectations except as otherwise required by applicable legislation



SOURCE Denison Mines Corp.

For further information: For more information, please contact: David Cates, President and Chief Executive Officer, (416) 979-1991 ext 362; Billie Jo Natomagan, Kineepik Métis Local #9, (306) 884-0001; Mike Natomagan, Northern

Village of Pinehouse, (306) 884-2030; Follow Denison on X (formerly Twitter), @DenisonMinesCo

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||

From: [Boser, Sydney](#)
To: [Boser, Sydney](#)
Subject: RE: Request for review: 2024-09-03 KML-CNSC monthly project meeting minutes
Sent: 2025-07-25 12:50:56 PM

From: Yen, Wish
Sent: September 11, 2024 11:02 AM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>
Cc: Takala, Torin <torin.takala@cnscccsn.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: Request for review: 2024-09-03 KML-CNSC monthly project meeting minutes

KML-CNSC Meeting Minutes – Monthly Project Updates

September 3th, 2024 3-3:30PM EST
Damien Georges, Gina, Jes Way, Torin Takala, Wish Yen

Wheeler River Project

Environmental Assessment (CEAA 2012)

- CNSC is aiming to wrap up the technical review within the next couple weeks
- A project bulletin update was shared out a couple of weeks ago
- Issues and concerns tables
 - CNSC is requesting KML's assistance in reviewing and validating that CNSC did not miss any key issues or concerns in the table that was shared

Licensing

- Denison has 1 outstanding technical document before passing the sufficiency review
- CNSC will continue to review the technical documents

KML Updates

- Exploration meetings are currently underway with various companies, not limited to uranium mines/mills
- KML is currently hosting the annual culture camp which runs the full month of September
 - KML invites CNSC to participate during the week of September 23rd to 27th with the other uranium mines/mill companies, including Cameco, Orano and Denison – Damien will confirm dates that would be convenient for CNSC to participate
 - MNS will be there for the full week

2023 UMMD ROR

- The in-person engagement for the 2023 UMMD ROR will be at TCU Place in Saskatoon
- Doors open at 8:30AM

- The ROR will focus on activities at facilities, such as events, spills, action level exceedances etc.

From: [Way, Jessica](#)
To: [Damien Georges](#); [Billie Jo Natomagan](#); nvp.mike@sasktel.net;
Cc: [Froess, Ryan](#); [Noakes, Rain](#); [Nickolet, Sydney](#);
Subject: 2024-10-01- CNSC-KML Wheeler River EA - Monthly Meeting Minutes
Sent: 2024-10-07 4:53:57 PM

Hi Damien, Mike and Billie Jo,

Thanks for taking the time to meet with us last week. Please see below for the minutes that we took.

Sincerely,
Jes

CNSC/KML – Monthly Wheeler River Meeting – Meeting Notes

Date: October 1, 2024, 1-2pm SK time

Participants:

- Canadian Nuclear Safety Commission (CNSC): Jes Way, Ryan Froess, Rain Noakes
- Kineepik Métis Local #9 (KML): Damien Georges, Mike Natomagan, Billy-Jo Natomagan, Gina

Meeting Minutes:

Wheeler River EA update

- Jes and Rain introduced themselves as Environmental Review Specialist and Environmental Review Officer, responsible for the EA process by the CNSC.
- Jes provided an update on the Wheeler River EA, explaining that the extended review process and the ongoing efforts to resolve information requests (IRs). Next Steps include:
 - Finalizing current review process, posting on the Registry and sending an update to the distribution list
 - Denison providing additional information to respond to outstanding IRs
 - Once all IRs are resolved, will inform Denison that they can submit a final EIS
 - If everything has been adequately incorporated, Final EIS will be accepted and a hearing will be scheduled
 - CNSC staff will develop their draft EA report and both the EA and Summary of CNSC conclusions on the licensing review (Commission Member Document) will be posted for comment and review prior to a hearing
 - CNSC staff will share information with KML throughout this process to keep up to date, and to provide support making any PFP request, and as well as preparing to present to the Commission at the hearing.
 - It could be as much as a year to a year and a half from accepting the Final EIS to the hearing date and licensing decision.

Denison Project Timelines and Community Concerns

- CNSC emphasized the importance of documenting issues and concerns raised by KML in their reports and ensuring they are addressed, and wondered about progress on reviewing the issues and concerns tables (Still underway by KML)

- KML raised concerns about the project's impact on their community and the need for more information to arrange training for youth in preparation for job opportunities.
- KML emphasized the importance of planning for training and job opportunities for their community members.
- KML is also concerned about road safety and the need for better maintenance and dust control on the roads used by industry.
- CNSC acknowledged the concerns and discussed the importance of raising these issues with CNSC, the province, and industry.
- CNSC & KML agreed on the need for critical conversations to address road safety and the potential impact on community safety.
- KML will review the issues and concerns table for discussion in future meetings.

Funding and Terms of Reference Discussion

- Discussion around the funding for Damien's position and the possibility of renewing it.
- CNSC are interested in formalizing CNSC's work with KML through terms of reference, which would include meetings and support for community events.
- CNSC emphasized the importance of documenting issues and concerns raised by KML in their reports and ensuring they are addressed.

Closing Remarks and Future Plans

- KML and CNSC discussed the importance of continued collaboration and addressing community concerns.
- CNSC raised the upcoming Regulatory Oversight Report (ROR) meeting in January and the plan to have regular meetings throughout the year.
- CNSC emphasized the importance of open communication and addressing issues together.

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Specialist | Spécialiste d'examen environnementale
 Environmental Review Division | Division de l'examen de l'environnement
 Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213

My work hours might not be the same as your work hours – please reply at your convenience.

KML & CNSC Meeting

December 3rd, 2024
Virtual

CNSC Attendees	KML Attendees
<ul style="list-style-type: none">• Sydney Nickolet• Ryan Froess• Jessica Way• Rain Noakes• Konrad Gorzkowski	<ul style="list-style-type: none">• Damien Georges

Agenda

- 1) **Denison Project Updates**
- 2) **TOR Updates**
- 3) **ROR Updates**

Meeting Notes

Topic	Discussion
Denison Project Updates	<ul style="list-style-type: none">• CNSC submitted a review of Denison's responses to IR's part way through October with a handful outstanding, and Denison provided responses to these a week later. Denison's responses were deemed adequate by CNSC and Denison submitted the final EIS on November 20th.• There is now a 30-day review of the final EIS before CNSC deems it accepted.• Once the EIS is accepted then CNSC starts writing the EA report which will include drafting of the Rights Impact Assessments (RIAs) which will be appended to the EA report. This will be provided to KML for review and comment.• The licence application has been deemed sufficient and the letter stating sufficiency has been sent to Denison and we are now in preparations in planning a Commission hearing. Once the date for the Commission hearing is known, CNSC will let KML know.• Once the Final EIS is accepted the documentation will be posted on the Registry. There will also be PFP and an opportunity to receive funding to review the EA report and participate in the Commission hearing.• Email on acceptance will be sent out the first week of January to the Nations including KML.• The email will include all information for relevancy from now until the Commission hearing.
TOR Updates	<ul style="list-style-type: none">• TOR is still in KML's hands and once the comments are made, they can send back to CNSC in order to get Adam Levine to review and sign off• KML mentioned a youth supper the first week of January in Saskatoon that CNSC could participate in

	<ul style="list-style-type: none"> • CNSC is looking forward to coming to the Pinehouse Annual Meeting tomorrow and will be bringing 4 staff members.
ROR Updates	<ul style="list-style-type: none"> • UMM ROR written interventions are due Dec 10th but KML can ask for an extension if needed • KML can either do just a written intervention or both an oral presentation and written intervention. Presentations will be due sometime in January • **Update: KML will only be doing an oral intervention for the UMM ROR in January. Oral presentations are due January 15th to the Registry.

Action Item Summary

Responsible Party	Action Item
KML	<ul style="list-style-type: none"> • KML to submit a written intervention to CNSC on UMM ROR by Dec 10th or request an extension (have updated CNSC and will only be doing an oral intervention). KML to submit the presentation by January 15th.
KML	<ul style="list-style-type: none"> • To send CNSC comments on TOR when ready

From: [Way, Jessica](#)
To: nvp.mike@sasktel.net
Cc: [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); [Gorzowski, Konrad](#); [Kwamena, Nana-Owusua](#); [Frigault, Nicole](#); [Way, Jessica](#); [Froess, Ryan](#); [Levine, Adam](#); [Noakes, Rain](#); [Dereniowski, Jeff](#) ENV; [Piper, Candace](#) ENV; [Damien Georges](#);
Subject: Wheeler River Field Test - Renewal Notification Letter to KML
Attachments: [E-DOCS-#7421364-v1-2024-12-05-Wheeler_River_Field_Test_-_Renewal_Notification_Letter_to_KML.pdf](#)
Sent: 2024-12-07 4:56:00 PM

Dear Mr. Natomagan,

The purpose of the attached letter is to notify you of an application for renewal from Denison Mines Corp. for a Nuclear Substances and Radiation Devices licence.

If you have any questions or would like to discuss further, please let us know. We would be happy to set up a meeting and provide any additional information.

Sincerely,

Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.



December 7, 2024

e-Doc: 7421364

Mike Natomagan

Kineepik Métis Local (KML) Pinehouse #9 (Métis Northern Region 3)

nvp.mike@sasktel.net

**Subject: Denison Wheeler River Project - Nuclear Substances and Radiation Devices
Licence Renewal Application**

Dear Mr. Natomagan:

This letter is to inform you that Denison Mines Corp. (Denison) has submitted an application to the Canadian Nuclear Safety Commission (CNSC) to renew Nuclear Substances and Radiation Devices licence No. 60677-1-24.0, issued for the Wheeler River Exploration Project in northern Saskatchewan. This licence application is for the temporary storage of natural uranium collected during the Feasibility Field Test. The recovered material will be temporarily stored above ground while Denison pursues a licence to continue operations at the Wheeler River site.

Proposed Wheeler River Project

The Wheeler River Property is located in the eastern part of the Athabasca Basin, approximately 4 km west of Highway 914 and 35 km north of the Key Lake mill. Denison has proposed a project to construct, operate, and decommission an in-situ uranium mine. An [Environmental Assessment \(EA\) under the Canadian Environmental Assessment Act of 2012](#) (CEAA 2012), led by CNSC staff, has been underway since 2019 for the proposed Wheeler River Project,. Concurrently, the Government of Saskatchewan is also leading a [provincial EA](#).

Field work at the site has been occurring since 2007, with advanced drilling and testing occurring since 2019. These activities have had continual oversight from the Saskatchewan Ministry of Environment, and the CNSC, as necessary.

Feasibility Field Test

The feasibility field test has concluded and the recovered mineralized material containing natural uranium is currently in above ground storage tanks at the Wheeler River site. The material remains the property of the Crown, under the oversight of the Saskatchewan Ministry of Environment (SMOE).

Denison's current request to renew the Nuclear Substances and Radiation Devices licence is to permit the mineralized solution to remain at the site and perform sampling of the material for further analysis. There is no change to the design or construction of storage tanks and protective barriers at the site. Likewise, there is no change to the CNSC regulatory requirements imposed through this licence.

The licence is proposed to have a term of two years, expiring December 31, 2026. Denison would be required to either renew the Nuclear Substances and Radiation Devices licence, transfer the material to another CNSC licence, or remove the material from the Wheeler River site prior to expiry of this licence.

Licensing Process

Unlike Class I nuclear facilities and uranium mines and mills, licences for use of Nuclear Substances and Radiation Devices are issued by a Designated Officer (DO) of the CNSC. A DO is a member of CNSC staff who has been designated specific powers under the *Nuclear Safety and Control Act* with respect to licensing and compliance. Like the Commission, DOs demonstrate independence and procedural fairness. With their extensive knowledge, regulatory training and operational experience, DOs are well qualified to make decisions on behalf of the Commission. DO decisions are based on rigorous reviews performed by CNSC staff, who verify that the applicant would meet regulatory requirements. After completing their evaluations, CNSC staff prepare DO documents – which include technical and regulatory information, conclusions and recommendations – to help inform DO licensing decisions.

DOs will only grant the licence if they are satisfied that the authorized activities do not pose a risk to health, safety, security and the environment.

Further Information

CNSC staff will continue to keep you apprised of the status of this licence application, DO decision and next steps, including more information on the CNSC's licensing requirements and oversight activities should a renewed licence be granted to Denison.

If you would like to meet to discuss in further detail, and have any questions relating to this licence renewal application for the Wheeler River Project, please contact:

- Jes Way, Environmental Review Officer, Wheeler River EA Lead
Email: jessica.way@cnsccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous Consultation and Engagement Division
Email: ryan.froess@cnsccsn.gc.ca

If you haven't already, you may also sign-up to the CNSC mailing list to receive notifications CNSC website is updated, including notices for hearings, meetings and Participant Funding Program opportunities. Visit the following link and choose the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

Sincerely,



Nicole Frigault

A/Director, Environmental Review Division
Canadian Nuclear Safety Commission
E-mail: nicole.frigault@cnsccsn.gc.ca

c.c.: D. Georges, KML
S. Faille, N. Babcock, P. Burton, K. Gorzkowski, N. Kwamena, J. Way, R.
Noakes, A. Levine, R. Froess, CNSC
J. Dereniowski, C. Piper, SEASB

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Way, Jessica](#); [alfred.dawatsare@erfn.net](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [bнатomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#); [Dennis Sherratt](#); [jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzkowski](#); [Konrad](#); [Kwamena](#); [Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [Noakes](#); [Rain](#); [McKeown, Justin](#); [Nicolet, Sydney](#); [Chani Campbell](#); [Janna Switzer](#); [Brienne England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#); [alfred.dawatsare@erfn.net](#); [Brienne England](#); [Kwamena](#); [Nana-Owusua](#); [Frigault, Nicole](#);

Bcc:

Subject: CNSC Wheeler River December 2024 EA Update - Accepted Final EIS

Sent: 2024-12-24 11:28:00 AM

Hi Everyone,

In our last update, we noted the completion of the technical review of Denison Mines Corp.'s (Denison) responses to outstanding Information Requests (IRs) for the Wheeler River environmental impacts statement (EIS). This update had also indicated that on November 22nd Denison submitted a final EIS package.

Following a 30 day review, the Canadian Nuclear Safety Commission (CNSC) has accepted the final EIS. This acceptance follows a comprehensive EIS technical review process by the Federal Indigenous Review Team (FIRT), including consultations with Indigenous Nations and communities

and members of the public. CNSC staff will now proceed with the preparation of the *Canadian Environmental Assessment Act, 2012* Environmental Assessment (EA) Report, which will be made available, along with a Commission Member Document, for review by Indigenous Nations and communities and the public prior to a public Commission hearing.

The following documents have now been posted to the Canadian Impact Assessment Registry (CIAR) for this project:

- [Letter: CNSC to Denison - Wheeler Project - Acceptance of the Final EIS and Supporting Documents](#)
- [Final environmental Impact Statement](#)
- [Combined Final EIS Appendices](#)
- [Commitments Register Version 5 - Wheeler River Final EIS Submission](#)

With these conclusions, along with the sufficient licence application, CNSC staff will notify CNSC Commission Registrar of this acceptance, who will proceed with scheduling public hearing dates. Further details regarding how to participate will be provided once the Commission Secretariat has announced the hearing dates. In early January, notifications will be sent to Indigenous Nations and communities with detailed next steps in the consultation process.

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnscccsn.gc.ca

Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).



January 21, 2025

Mr. Pierre Tremblay
President and Chief Executive Officer

Pierre.Tremblay@cnscccsn.gc.ca

Mr. Ramzi Jammal
Executive Vice-President and
Chief Regulatory Operations Officer
Ramzi.jammal@cnscccsn.gc.ca

RE: Next Approval Steps for Wheeler River Project

Dear President Tremblay and Executive Vice-President Ramzi Jammal:

We recently met with the Denison team and understand that the CNSC has accepted a final Environmental Impact Statement from Denison, and is now looking to finalize the approval process. Congratulations to all those involved, as we know this is a major milestone for the company and for the regulator.

The Wheeler River Project located in the Kineepik Métis Local #9 Use and Occupancy Area. Kineepik is the primary representative of the Métis who live within the Kineepik Use and Occupancy Area, Kineepik is the Métis community closest to the Project, and Kineepik is the only Métis Aboriginal rights holder with demonstrated and substantive ties to the Project area.

Over the past many years, indeed since 2016, Denison and Kineepik have developed a strong relationship built on trust, respect, and deep engagement on the Project and on what matters to Kineepik. Over the years Denison has understood the areas of interest of the Project to Kineepik, and has committed to significant design measures to reduce the potential impact to us and our community, along with a willingness to share economic benefits from activities occurring in our traditional area. As a result, we have been pleased to provide Denison with support and consent for the Project.

Over the last year, Denison and Kineepik-owned businesses have been working in earnest to prepare for the forthcoming construction activities associated with the Project. This has included investing in our own businesses to support the successful execution of Wheeler River. We are ready to be involved in the project, and would like to request that the Commission consider the important need for the final approval process for the Wheeler River Project, including the setting of hearings, to be completed by the end of 2025, which will ensure that our efforts toward planning and being meaningfully involved, are realized in a timely fashion.

We have firsthand knowledge and experience regarding how the CNSC and the Commission provide responsible and transparent oversight over the uranium mines located north of our community, in our traditional lands, and look forward to working together on this project. Should you require any further information, please contact me at the information included below.

Sincerely

Mike Natomagan
President of Kineepik Métis Local #9

From: [Way, Jessica](#)
To: mnatomagan@kineepik.ca
Cc: [Levine, Adam](#); [Burton, Patrick](#); [Way, Jessica](#); [Froess, Ryan](#); [Duhaime, Brenda](#); [Gorzowski, Konrad](#); [Noakes, Rain](#); [Zenobi, Adam](#); [Wheeler River Project - Projet de Wheeler River](#); [Damien Georges](#);
Subject: Next Steps of Consultation with KML - Proposed Wheeler River Project
Attachments: [2025-01-22-Letter-CNSC_to_KML_-_Next_steps_of_the_Regulatory_Process-Wheeler_River_EA_.pdf](#)
Sent: 2025-01-22 6:50:31 PM

Dear Mr. Natomagan,

I am sending the attached letter on behalf of the CNSC, outlining proposed next steps of the CNSC's consultation process with Kineepik Métis Local for the Wheeler River regulatory review process.

We look forward to hearing back from you and setting up a meeting to discuss further.

Sincerely,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.



CIAR NO.: 80178

e-Doc: 7444568

January 22, 2025

Mr. Mike Natomagan
Kineepik Métis Local
Pinehouse, Saskatchewan
mnatomagan@kineepik.ca

Subject: Proposed Next Steps of Consultation with Kineepik Métis Local for the Remaining Steps of the Regulatory Review Process for the Proposed Wheeler River Project

Dear Mr. Natomagan:

The purpose of this letter is to provide an update and share a proposed consultation approach with Kineepik Métis Local (KML) on the remaining steps of the regulatory review process for Denison Mines Corp.'s (Denison) proposed Wheeler River Project (the Project).

Current Status of the Process of the federal Environmental Assessment

On December 24, 2024, the federal review of Denison's Environmental Impact Statement (EIS) concluded, and the Final EIS was accepted by CNSC staff as it meets the requirements of the *Canadian Environmental Assessment Act*, 2012 (CEAA, 2012). As communicated in CNSC's December 24th, 2024 email to the project distribution list for the project, the documents can be found on the [Canadian Impact Assessment Registry \(the Registry\)](#).

CNSC staff have reviewed the responses Denison provided to comments that were received during the public comment period on the draft EIS in 2023, including those from KML. The comments and Denison's responses are now [available on the Registry](#). CNSC staff have also drafted responses to comments that were applicable to CNSC's oversight and responsibilities and look forward to further discussing these as part of our proposed next steps as described below. CNSC's responses to these comments can also be [found on the Registry](#).

Proposed Next Steps of Consultation

Building on the ongoing consultation, relationship building, and engagement that began in 2019 between KML and CNSC in relation to the Project, CNSC staff provide the consultation approach as outlined in Appendix 1. Table 1 of this letter details the suggested consultation and collaboration activities for the remaining steps of the regulatory review process for the Project.

The CNSC staff will be preparing the following reports and documents to support staff's recommendations to the Commission:

- **An EA Report** which provides information and analysis to assist the Commission in its determination on whether the proposed project is likely to cause significant adverse environmental effects.
- **A Consultation Report** which will include an assessment of the Project's potential impacts to the Rights and interests of select Indigenous Nations and communities as well as recommendations regarding the Duty to Consult and Accommodate.
- **A Commission Member Document (CMD)** which presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation.

CNSC staff are interested in collaborating with KML to ensure that KML's perspectives, issues and concerns, Indigenous Knowledge and Land use information, potential impacts of the proposed Project on KML rights, and other topics of interest to KML are properly reflected in CNSC staff's reports and recommendations. This would involve CNSC staff developing the content as a first step based on information that KML has submitted and provided to date to the CNSC and Denison and then sharing the draft content with KML representatives for their review and comment. CNSC staff will be providing detailed timelines on the remainder of the regulatory process once a Commission hearing date has been identified by the Commission Registry.

The activities outlined in the proposed consultation approach are flexible, and CNSC staff would like to discuss these remaining steps of the regulatory review process with KML. Some potential topics for discussion include:

- review of, and input to the CNSC's assessment of the Project's potential impacts on KML rights and interests
- review of sections of CNSC's Consultation Report specifically related to information on KML community member perspectives, knowledge, land use, concerns, and rights
- awarding funding through the CNSC's PFP to support the review of CNSC's reports and consultation and engagement with the CNSC
- discussions and collaboration with the CNSC and Denison, as appropriate, regarding potential commitments, mitigations and accommodations to address potential impacts on KML's rights and interests
- participation in the Commission hearing process through interventions as well as collaboration on the inclusion of KML's cultural practices and protocols as part of the Commission hearing process, as appropriate
- discussions on the assessment and overall evaluation of Denison's engagement activities with KML as per REGDOC 3.2.2: Indigenous Engagement
- discussion and collaboration with the CNSC on conclusions and recommendations related to topics of concern and interest to KML

CNSC staff are committed to continued collaboration with KML to ensure that the consultation for the Project is meaningful, addresses KML's concerns, protects your Nation's rights and interests,

and upholds the Honour of the Crown. To discuss any matters related to the regulatory review process of the Project, please contact:

- Jes Way, Environmental Review Officer, Wheeler River EA Lead
Email: jessica.way@cnscccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous Consultation and Engagement Division
Email: ryan.froess@cnscccsn.gc.ca

Please review the proposed consultation process for the remaining steps of the regulatory review process for the Wheeler River Project (Appendix 1) and **provide any feedback by February 17, 2025 or we would be happy to set up a meeting to discuss.**

The CNSC looks forward to continuing to build a long-term relationship with KML and working together throughout the regulatory review process for the proposed Wheeler River Project.

Yours sincerely,



Nana Kwamena
Director
Environmental Review Division
Canadian Nuclear Safety Commission



Justin McKeown
A/ Team Leader, Western & Northern Regions
Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission

c.c./c.c. : CNSC: A. Levine, P. Burton, J. Way, R. Froess, B. Duhaime, K. Gorzkowski, R. Noakes, A. Zenobi
KML: D. Georges

Enclosure: (1) Proposed consultation process with Kineepik Métis Local for the regulatory review process of the Wheeler River Project

References:

- [1] CNSC, Regulatory Guide, *REGDOC- 3.2.2: Indigenous Engagement*, Version 1.2, February 2022, <https://www.cnscccsn.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc3-2-2-v1-2/>
- [2] CNSC, *Generic Guidelines for the Preparation of an Environmental Impact Statement*, May 2016, <http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>

Appendix 1

Proposed Consultation Process with Kineepik Métis Local for the Remaining Steps of the Regulatory Review Process of the Wheeler River Project

1. Introduction

These proposed next steps in the consultation process, which started in 2019, are intended to guide federal Crown consultation activities (led by the CNSC) with Kineepik Métis Local (KML) during the remaining steps of the regulatory review process of the Wheeler River Project (the Project). They communicate the federal CNSC's objectives for consultation, the proposed structure for integrating consultation into the regulatory review process, and the proposed activities in which the CNSC and KML can work together to address KML's concerns regarding the Project.

2. CNSC's Consultation Objectives

- To continue the establishment of a positive and productive working relationship with KML during the remaining steps of the regulatory review process.
- To communicate with KML about the Project and developments during the regulatory review process in a timely manner.
- To establish how KML would like to be consulted during the remaining steps of the regulatory review process and establish a flexible and responsive consultation approach that is consistent with the consultation approach to date.
- To work with KML to continue to:
 1. identify any potential environmental effects of the Project, including those on current use of lands and resources for traditional purposes, health and socio-economic conditions, and heritage resources
 2. identify adverse impacts of the Project on your community's potential or established rights
 3. ensure options for avoiding, mitigating, or accommodating adverse impacts are considered
- To work with KML and the proponent to respond to specific questions and requests regarding issues raised related to the Project.
- To listen to and understand the concerns raised, and consider the feedback, perspectives, and issues raised by KML in order to inform decision-making.
- To collaborate with KML and the proponent to identify any potential commitments, mitigations, accommodations and conditions to address KML's concerns regarding any potential impacts on KML's rights and interests as a result of the proposed project.

3. Integrating Consultation into the Regulatory Review Process

Table 1 provides a description of the main remaining steps in the regulatory review process and a description of how the CNSC proposes to integrate consultation activities into those steps. This table describes what KML should receive, have access to, or expect from the CNSC, on behalf of the federal Crown, and what KML could share and provide to the regulatory review process.

Table 1: Integrating Consultation into the Remaining Steps of the Regulatory Review Process¹

Regulatory Review Step²	Description of Activities³	What KML should receive, have access to, or expect from the federal Crown	Information KML may want to consider providing to the federal Crown, and ways KML may want to participate
Project Description Review and Scoping Decision (Completed in 2019-20)	<ul style="list-style-type: none"> • Opportunity for KML to provide comments on the Project Description – Completed 	<ul style="list-style-type: none"> • CNSC notification to KML of the project and project description review process – Completed • PFP offering – Completed • Early information sharing and offers of consultation meetings – Completed 	<ul style="list-style-type: none"> • Provide comments on the project description – Completed

¹ Adapted from a template developed by the Canadian Environmental Assessment Agency (CEAA) (CEAA references the BC First Nations Environmental Assessment Technical Working Group Toolkit Workshop as a basis for this document).

² Any updates to dates related to the regulatory review process will be communicated to KML.

³ Denison's activities during this step of the regulatory review process are not specifically steps of the regulatory review process, but these are expectations of Denison, by CNSC staff.

Regulatory Review Step ²	Description of Activities ³	What KML should receive, have access to, or expect from the federal Crown	Information KML may want to consider providing to the federal Crown, and ways KML may want to participate
<p>Environmental Impact Statement (EIS) Review</p> <p><i>(Initiated 2022 – complete as of December 24, 2024)</i></p>	<ul style="list-style-type: none"> • Opportunity for KML to provide comments on draft EIS – Completed • Denison to revise documentation to address comments and concerns raised by KML. - Completed • Denison expected to discuss with KML how their comments and concerns have been addressed. - Completed 	<ul style="list-style-type: none"> • Opportunity to provide feedback to the Crown on adequacy of Denison's responses to KML's comments and concerns. - Completed • Opportunity to participate in technical discussions with CNSC staff regarding KML's outstanding comments and concerns, as well as other discussions as necessary (e.g. teleconferences and/or meetings with Métis Local, community open houses). - Completed • Opportunity to discuss how to integrate Traditional Knowledge and Land Use (TKLUS) information into the remaining steps of the regulatory review process. - Completed • Opportunity for direct and continued discussions between KML and the CNSC. - Completed 	<ul style="list-style-type: none"> • Provide KML's views on the accuracy of Denison's information about issues KML have raised and on any proposed ways of addressing those impacts. - Completed • Provide feedback on the adequacy of Denison's responses to KML's comments and concerns. - Completed • Participate in technical discussions with CNSC staff to address KML's outstanding comments and concerns. - Completed

Regulatory Review Step ²	Description of Activities ³	What KML should receive, have access to, or expect from the federal Crown	Information KML may want to consider providing to the federal Crown, and ways KML may want to participate
<p>Development of draft Consultation Report</p> <p><i>(Current phase – 2025)</i></p>	<ul style="list-style-type: none"> The CNSC's Consultation Report also includes a summary of consultation with Indigenous Nations and communities, potential impacts to potential or established rights of Indigenous Nations and communities, views and concerns expressed by Indigenous Nations and communities and the CNSC's response to those concerns, and including potential mitigation and accommodation measures, and commitments and conditions to address those concerns. The CNSC's goal is to work towards a consensus on the key issues and concerns in relation to the proposed project with KML. 	<ul style="list-style-type: none"> Opportunity to review and comment on sections of the draft Consultation Report specific to KML such as Indigenous Knowledge and Land Use information, potential impacts of the Project on KML's rights and interests, and concerns expressed. <ul style="list-style-type: none"> CNSC staff writing the draft sections and providing to KML for review and comment for consideration and/or inclusion. The objective is to obtain mutually agreed upon text, between CNSC staff and KML (as noted in the next step, where KML has diverging views with CNSC staff's analysis and findings, these will be reflected in the Consultation Report, and we also invite KML to capture this information in their written and/or oral intervention to the Commission). 	<ul style="list-style-type: none"> Review and provide comment on sections of the draft Consultation Report specific to KML.

<p>EA Report, Consultation Report and Licensing CMD Review</p> <p>AND</p> <p>Commission Public Hearings</p> <p><i>(Hearing date 2025 –2026 TBD)</i></p>	<ul style="list-style-type: none"> • The EA Report presents the CNSC staff's evaluation on the findings of the EA, including conclusions and recommendations regarding the adverse environmental effects that are likely to result from the project, appropriate measures that would mitigate those effects, the significance of residual effects after implementation of the mitigation measures, as well as the components of the follow-up and monitoring program. • CNSC staff will submit and make publicly available, for review, the Final EA Report, Consultation Report, and licensing CMD in advance of public hearings (timing to be determined by CNSC Registry). • The licensing CMD presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation. • The Commission will hold public hearings with opportunities for public and Indigenous Nations and communities to submit oral and/or written interventions. CNSC staff and the Registry are open to working with KML to 	<ul style="list-style-type: none"> • Opportunity to review the Final EA Report, Consultation Report, and licensing CMD to inform oral and/or written interventions. 	<ul style="list-style-type: none"> • Present KML's views to the Commission by providing information orally and/or in writing. • It is recommended that any diverging views with CNSC staff's analysis and findings in the CNSC's reports be captured in KML's written and/or oral intervention to the Commission, if required.
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Regulatory Review Step ²	Description of Activities ³	What KML should receive, have access to, or expect from the federal Crown	Information KML may want to consider providing to the federal Crown, and ways KML may want to participate
	ensure that the Commission hearings include and reflect KML's cultural protocols and processes.		
Commission's EA and Licensing Decisions (Future phase - TBD)	<ul style="list-style-type: none"> The Commission considers the EA Report, Consultation Report, CMD and interventions from the public and Indigenous Nations and communities and determines whether, taking into account the mitigation measures, conditions, accommodations and commitments proposed, the Project is likely to cause significant adverse environmental effects and if the duty to consult and accommodate was met. Should the Commission issue an EA decision statement allowing the Project to proceed, the Commission will also include legally binding conditions with which Denison must comply to implement appropriate mitigation measures and a follow-up and monitoring program. 	<ul style="list-style-type: none"> Notification and sharing of the Commission's Detailed Record of Decisions (EA and licensing). Meetings with KML to discuss the Commission's decision and next steps for ongoing engagement and collaboration. 	<ul style="list-style-type: none"> Feedback on preferred approach to ongoing engagement, information sharing, oversight, monitoring, reporting and collaboration.

From: [Boser, Sydney](#)
To: [Damien George](#)
Cc: [Way, Jessica](#); [Froess, Ryan](#);
Subject: KML & CNSC Meeting Notes - Feb 4th 2025
Attachments: [Wheeler_River_-_Rights_Impact_Assessment_Framework_Presentation - KML Feb 2025.pdf](#)
Sent: 2025-02-11 11:31:00 AM

Hi Damien,

Please see below the notes from our monthly meeting as well as the presentation that Ryan gave attached. We will be in touch in the coming weeks on beginning the RIA – hope you have a great week!

-

CNSC & KML Monthly Meeting – February 4th 11am-12pm CST

Participants: Sydney Boser, Ryan Froess, Jes Way, Rain Noakes, Mike Natomagan and Damien George

Funding:

- Damien's position runs until September but KML should reapply for the funding when it opens in Spring 2025 (April)
- Payment should be coming in soon to KML for continued funding on Damien's position for 2025

TOR:

- KML to send CNSC copy with their edits attached for CNSC to review and then we can work together on the workplan on how we will continue to work together
- Funding is included with the workplan once the TOR is signed. Typically this includes quarterly meetings and a working group. Approx. \$30k yearly for these activities

Denison Project Update:

- CNSC accepted the final EIS on December 24th 2024 for the Wheeler River Project
- CNSC will be drafting the environmental assessment report (EA report), as well as the Rights Impact Assessment (RIA) and the Commission Member Document (CMD)
- CNSC doesn't have timing yet as it is currently with Registry to make those decisions but are looking at Part 1 of the hearing being in the fall and Part 2 following that
- Part 1 is CNSC and Denison presentation and then Part 2 is where Nations would intervene
- PFP funding is now available to apply for to receive funding for this process. The deadline to apply is April 4th
- KML did send in support letter for the project and have provided consent from the community
- Letters of support have been posted on the website for public access
- CNSC is still working on the Denison licensing review
- CNSC is wanting to do more outreach in the communities for the Denison project in the Spring sometime but will keep KML updated on that

RIA Discussion:

- Ryan presented presentation for next steps in the process on the RIA's
- Can share the presentation with KML
- KML may be bringing on some support staff to support Damien and this process

Actions:

- CNSC to share RIA presentation with KML (complete)
- KML to share TOR edits with CNSC
- CNSC to begin drafting RIA specific to KML and share with them for review when ready

Cheers,

Sydney Boser née Nickolet (she/her/elle)

Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnsccsn.gc.ca
Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties
intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnsccsn.gc.ca

*I acknowledge that the land on which I live and work is the traditional Treaty 6
Territory and Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel
du Traité 6 et la patrie des Métis*



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

CNSC's Indigenous and/or Treaty Rights Impact Assessment Framework

Wheeler River EA process



Overview

- Background
- Objectives and Criteria for Conducting RIAs
- CNSC's Framework
- Roles and Responsibilities
- Reports and Timelines

Background

- Rights impact assessments (RIAs) have become common place for major resource projects and major regulatory processes in Canada
- Main drivers include:
 - Government of Canada priorities, policies and directives (e.g. rights recognition and implementation framework, Principles Respecting the Government of Canada's Relationship with Indigenous Peoples, reconciliation, TRC Calls to Action)
 - Legislative (e.g. IAAC, CEAA)

Objectives

The objectives of developing a framework and policy related to the assessment of the potential impacts to Indigenous and/or Treaty rights are to ensure:

- that projects undergoing an Environmental Assessment and/or licensing processes led by the CNSC that trigger the duty to consult and accommodate consider the potential impacts on Indigenous and/or Treaty rights
- the Commission receives clear and complete information and analysis regarding potential impacts on rights with regards to their decisions
- the CNSC's approach to consultation is aligned with current and evolving requirements and expectations of the courts, legislation, and best practices and approaches across the federal government

Criteria for RIA

Conducting a RIA is appropriate when certain criteria are met:

- The project/Commission's Decision raises the Duty to Consult
- Identified Indigenous Nations and communities are actively engaged, have identified/demonstrated the exercise of Indigenous and/or treaty rights in the vicinity of the project and have identified specific concerns with regards to potential impacts from the proposed project on their rights and interests

CNSC's Framework for RIA

- CNSC is currently the Responsible Authority for 5 ongoing EAs under CEAA 2012 where the Duty to Consult has been triggered and a number of Indigenous Nations have asserted through consultation processes that their rights and interests may be potentially impacted
- CNSC staff have conducted benchmarking against existing RIA frameworks and guidance (e.g. IAAC Interim Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples)
- CNSC staff have worked from these examples to create a RIA framework that can be applied to CNSC regulatory processes and tailored to each major project and for Indigenous Nations being consulted

CNSC's Framework for RIA

- Based on feedback from the Indigenous Nation, CNSC can complete a ***Qualitative*** or ***Quantitative*** RIA
- Qualitative approach provides a narrative-based, overview assessment on the potential impacts to Rights
- Consolidates existing project information, summarizes key issues and concerns, and considers mitigations, commitments and accommodations which address potential impacts to Rights
- Opportunity for the Indigenous Nation to provide feedback on the adequacy of mitigations, commitments and accommodations to address key concerns/potential impacts and/or provide additional mitigations or commitments that the Indigenous Nation recommends to address key concerns/potential impacts

CNSC's Framework for RIA

Step 1: Identification of potentially impacted rights and interests

Step 2: Identification of current baseline conditions in current territorial capacity and historical context

Step 3: Identification of potential project interactions/pathways with identified rights and interests (i.e. potential changes to current baseline conditions related to the project)

Step 4: Identification of severity of potential project interactions with identified rights and interests

Step 5: Identification of any potential mitigation and/or accommodation measures to address identified potential project interactions with identified rights and interests

Step 6: Identification of any residual impacts after consideration of proposed mitigation and/or accommodation measures

Step 7: Consideration of any additional mitigation and/or accommodation measures, should residual impacts be identified, and conclusions on seriousness of any remaining impacts or concerns

Step 8: Documenting and submitting process steps and outcomes to decision-makers (the Commission)

- Collaborative drafting of stand-alone rights impact analysis report to be appended to CNSC staff's EA report or CMDs
- Review of relevant sections of the Indigenous consultation section of CNSC staff's EA report or CMDs
- Written submissions from the Indigenous group to the Commission and oral intervention at Commission hearings

Role of Indigenous Representatives

- Sharing information related to perspectives, issues and concerns, Indigenous Knowledge and Land use information, potential impacts of the proposed Project on rights, and other topics of interest
- Providing documented information for consideration in the RIA process, where appropriate (e.g. Indigenous Knowledge and Land Use studies)
- Participating in meetings and discussions with CNSC (and Denison or the Province of Saskatchewan, if necessary)
- Reviewing drafted content to ensure content specific to the Nation(s) is reflected accurately, within the timeframes provided (including approvals by members of leadership)

Role of Project Proponents

- The RIA process is to be conducted primarily between the Crown (CNSC) and potentially impacted Indigenous Nations and communities , however, project proponents have an important role to play throughout the EA or licensing process, where appropriate:
 - Providing data and information on the project and potential project impacts (historical context and future plans)
 - Providing information regarding proposed mitigation measures to address potential environmental effects and/or impacts on rights as well as other commitments or other measures to address concerns raised by Indigenous Nations
 - Participating in discussions around potential additional measures and commitments (e.g. accommodations) to address any identified remaining impacts on rights

Reports Produced

CNSC staff will produce the following reports that will be made public and for Commission:

- **A Commission Member Document (CMD)** which presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation. *Example: [Chalk River NSDF CMD \(Feb 2022\)](#) (PDF p. 1 to 181)*
- **An EA Report** which provides information and analysis to assist the Commission in its determination on whether the proposed project is likely to cause significant adverse environmental effects. *Example: [Near Surface Disposal Facility EA report \(Feb 2022\)](#) (PDF p. 182)*
- **A Consultation Report** which will include an assessment of the Project's potential impacts to the Rights and interests of select Indigenous Nations and communities as well as recommendations regarding the Duty to Consult and Accommodate. *Example: [CNSC staff's Indigenous Consultation Report for DNNP](#) (PDF p. 700)*

Timelines

Activity	Responsible	Timeframe	End Date
CNSC Drafting RIAs and other chapters of consultation report	CNSC	-	End-April
Joint meetings and correspondence with Nations on RIAs, and other report content as applicable	CNSC/Nation	~5 Weeks	End-April
Review/comment of RIA content and report sections* by the Nation	CNSC/Nation	~6 Weeks	Mid-June
CNSC Final revisions to report following feedback from Nations and communities	CNSC	~2 weeks	End-June
CNSC Internal Approvals process/translation	CNSC	TBD	TBD
Posting of Reports for Intervention process	CNSC	TBD	TBD
Hearing Part 1	CNSC	TBD	TBD
Hearing Part 2	CNSC	TBD	TBD

*This could include content from the EA report, if applicable

Questions?



VIA EMAIL

e-Doc 7465467 (Word)

e-Doc 7465472 (PDF)

February 24, 2025

Mike Natomagan
President of Kineepik Metis Local #9
P.O. Box 166
Pinehouse, Sk.

Dear Mike Natomagan,

Re: Next Steps for Wheeler River Project

I write in response to your letter of January 21, 2025, written to President Tremblay and Executive Vice-President and Chief Regulatory Operations Officer Jammal regarding the next steps for the Wheeler River Project.

I am the Commission Registrar. Part of my role is to manage the Commission's public proceedings and, in relation to those proceedings, it is the Commission Registry through which all hearing-related questions are directed. This is to ensure a fair and transparent process. It is also the reason I am replying to your letter.

Please be assured that your letter has been considered in the planning for the upcoming public hearing in this matter, alongside several other factors in order to ensure the informal and expeditious proceedings that are mandated by subsection 20(3) of the *Nuclear Safety and Control Act*.

In addition to considering your and other letters, the Registry has received recommendations for hearing dates from CNSC staff and has met with Denison Mines representatives on this issue. Hearing dates are being confirmed and will be announced in the coming days.

I thank you for your request for an expeditious hearing, and for the perspectives you have provided. I look forward to further communication as we plan for this proceeding.

Please do not hesitate to reach out if you have any further questions.

Sincerely,



Candace Salmon

Commission Registrar
Legal and Commission Affairs Branch
Canadian Nuclear Safety Commission
candace.salmon@cnsccsn.gc.ca / cell: (343) 630-3471

Registraire de la Commission
Direction générale des affaires juridiques et de la Commission
Commission canadienne de sûreté nucléaire
candace.salmon@cnsccsn.gc.ca / Tél. (343) 630-3471

cc. Pierre Tremblay – pierre.tremblay@cnsccsn.gc.ca
Ramzi Jammal – ramzi.jammal@cnsccsn.gc.ca

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Boser, Sydney; Way, Jessica;](#)
[alfred.dawatsare@erfn.net; cheyenna.hunt@desnedhe.com;](#)
[jenny.wolverine@erfn.net; nvp.mike@sasktel.net;](#)
[bнатomagan@kineepik.ca; glenmccallum@mns.work; blaroque@mns.work;](#)
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[bmerasty@pbcn.ca; patti@mccunn-miller.com; cbeatty@pbcn.ca;](#)
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[ty.roberts@lrib.ca; ashley.carlson@lrib.ca; gchristiansen@lrib.ca;](#)
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[mirmirans@cna.ca; Bruce Hanbidge; Dennis Sherratt;](#)
[jessielacosta2017@gmail.com; Damien Georges; Gorzkowski, Konrad;](#)
[Kwamena, Nana-Owusua; Burton, Patrick; Takala, Torin; Paul James; Noakes,](#)
[Rain; McKeown, Justin; Boser, Sydney; Chani Campbell; Janna Switzer;](#)
[Brienne England; Carolanne Inglis-McQuay; Executive Secretary; Margaret](#)
[Rosling; alfred.dawatsare@erfn.net; Brienne England; Kwamena, Nana-](#)
[Owusua; aj_wilson; Duhaime, Brenda; Trieneke Gastmeier; Ryan Smith;](#)
[Keegan McGrath;](#)

Bcc:

Subject: CNSC Wheeler River March 2025 EA Update - Hearing Dates and Participant Funding

Sent: 2025-03-06 7:24:00 PM

Hi Everyone,

On February 27, 2025, the Canadian Nuclear Safety Commission (CNSC) announced hearing dates for a public hearing on Denison Mines Corporation's licence application to prepare a site for and construct its Wheeler River mine and mill project. The hearing will also consider the Environmental Assessment, which is being conducted under the *Canadian Environmental Assessment Act*, 2012.

The two part hearing will be held as follows:

Part 1:

- Date: October 8, 2025
- Place: To be determined (National Capital Region and/or virtually via zoom)
- Time: As set by the agenda to be published prior to the hearing date

Part 2:

- Date: Week of December 8, 2025
- Place: To be determined (Saskatoon)
- Time: As set by the agenda to be published prior to the hearing date

More information can be found in the CNSC's public notice here: <https://api.cnscccsn.gc.ca/dms/digital-medias/Notice-of-Public-Hearing-and-Participant-Funding-2025-H-09.pdf/object>

Also, a reminder if you are planning to apply, **participant funding applications are due on April 4, 2025.**

Additional information about the Wheeler River EA process can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnscccsn.gc.ca

Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

From: Noakes, Rain
To: matomagan@kineepik.ca; dgeorges@kineepik.ca;
Cc: [Way, Jessica](#); [Boser, Sydney](#); [Froess, Ryan](#);
Subject: March 26 Meeting Minutes
Sent: 2025-04-03 4:01:00 PM

Hello Mike and Damien,

I hope this finds you both well. Please see below for the meeting minutes from March 26th, 2025.

If you are interested in participating in the study committee on cancer among miners, with meetings at the University of Saskatchewan, please let us know. The next meeting for this study committee is being held on May 28th, 2025.

Do not hesitate to reach out with any questions or concerns.

Kindly,

Rain

Meeting Minutes: Wheeler River - CNSC and KML

Date: March 26, 2025

Location: CNSC Saskatoon Office

Participants:

- **CNSC Representatives:**
 - Jes Way (Environmental Review Officer – Environmental Review Division)
 - Sydney Boser (Senior Policy Officer - Indigenous Consultation and Engagement Division)
 - Ryan Froess (ERD)
 - Rain Noakes (ERD)
- **Kineepik Métis Local #9 Representatives:**
 - Mike Natomagan (President of KML Metis Local and Mayor of Pinehouse)
 - Damien Georges (Environnement Manager – KML)

Discussion:

1. Opening Remarks

- The meeting commenced with a discussion on the environmental assessment drafting phase following the acceptance from Denison's Final EIS in December 2024.
- CNSC is preparing for the hearing scheduled for October 8 and December 8, 2025, with part one in Ottawa and virtual, and part two in December in person in Saskatoon.

2. Hearing Reports

- CNSC is drafting the environmental assessment (EA) report, consultation report, and Commission Member Document.
- The EA Report assessments from subject matter experts will cover various topic areas such as atmosphere, water, fish, and species at risk, but will also include Views Expressed, which will include information that has been shared with us by KML.
- The Consultation report will not contain information on rights impact assessments; this information will be submitted as a supplemental report, not within the same timeframe as the consultation report and we will begin drafting these in June.
- The RIA will be part of the consultation report but submitted later in the year before the Part 2 commission hearing. KML will have an opportunity to review the RIA when ready.

3. Review Timelines

- CNSC plans to send relevant information to KML for review by mid to late April, with a return deadline around the second to last week of May.
- The review will not be extensive, focusing on verifying conclusions KMLs information on VECs and consultation.

4. Outreach Sessions Next Steps

- Denison is planning outreach sessions around the week of the Elders gathering in June, aiming to collaborate with CNSC. Would be great to get another meeting that week with Elders and community members like was done last year.
- Discussion on potentially signing the terms of reference during the Elders gathering in June.
- Agreement to schedule monthly meetings, with the next meeting proposed for April 14th.

5. KML and Community Concerns

- KML expressed concern around the Feb 27th letter that MN-S sent to CNSC regarding a pause in the hearing process for Denison. KML was not aware that this letter was being sent and is disappointment that they are not supporting their Metis locals on this project. KML will be sending a letter to MN-S to express their concerns.
- KML expressed the need for better advocacy from MNS and CNSC for impacted communities.
- In terms of the EA, CNSC acknowledged concerns from land users about safety, roads, and other issues.
- More generally, KML emphasized:
 - The importance of monitoring water, air, and other environmental factors and plans to continue to build up environment team to provide support for Damien.
 - Concerns with the lack of regular meetings and engagement from industry representatives (Cameco use to come 4 x per year not anymore)
 - The need for Indigenous training for industry personnel to respect the land and people.
 - The importance of maintaining good practices and regular engagement with impacted communities between industry and regulators
- The importance of involving youth in meetings and hearings to build their confidence and understanding.

6. Cancer Study Committee

- Invitation for KML to participate in a study committee on cancer among miners, with meetings at the University of Saskatchewan. The next meeting is being held on May 28th and CNSC is looking to see if KML wants someone to attend.

7. Participation Funding

- Discussion on the participation funding for hearings and the importance of community involvement in the process.
- KML will be submitting their PFP application for the deadline of April 4th for Wheeler River.
- CNSC also mentioned funding opportunity for Reg Doc 3.2.2 if interested in applying is due March 30 but if need extension please reach out.

8. Closing Remarks

- The meeting concluded with a commitment to ongoing collaboration and addressing community concerns.
-

Rain Forest Noakes, MEnv, RBTech
(he / him / il)

Environmental Review Officer | Agent en examen de l'environnement
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Rain.Noakes@cnsccsc.gc.ca | Tel: (778) 687-1324

My work hours might not be the same as your work hours – please reply at your convenience.

From: [Way, Jessica](#)
To: [Damien Georges](#)
Cc: [Boser, Sydney](#); [Noakes, Rain](#); [McKeown, Justin](#); [Way, Jessica](#);
Subject: FW: CNSC & KML Documents for Review - Denison Wheeler River: Consultation Report and EERRs
Attachments: [KML Consultation Report Section 4.2 - For Review.docx](#); [E-DOCS-#7508610-v3-2025-04-25-KML_EA_Content_For_Review.DOCX](#);
Sent: 2025-04-30 8:24:28 AM

Hi Damien,

Apologies for any confusion, but there are a couple of edits in the EA Report content. I realized that I missed a couple of things when compiling, please see edits in track changes.

Thanks,
Jes

From: Boser, Sydney <sydney.boser@cnscccsn.gc.ca>
Sent: Friday, April 25, 2025 5:17 PM
To: Damien George <dgeorges@kineepik.ca>
Cc: Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>
Subject: CNSC & KML Documents for Review - Denison Wheeler River: Consultation Report and EERRs

Good afternoon Damien,

As discussed previously, please see attached the information for your review. There are two documents attached which are the following:

1. Section 4.2 of the Consultation Report which outlines our consultation activities since the beginning of the Wheeler River project in 2019. This also includes background information on KML, a table summary of key consultation activities to date, a summary of concerns raised to date and CNSC staff's response. This information will be publicly accessible, once published.
2. The EA Report content for review includes Views Expressed sections for each topic area. As you will see from the table of contents included in the first part of the attachment, the EA report will contain sections for each topic area (ie. Atmospheric, aquatic environment, and so on), each of which will include: a description of the environment, the proponents assessment, other views expressed (and how concerns were addressed), CNSC staff's analysis, followed by CNSC staff's conclusions on whether there are significant adverse effects. The content attached for review only includes the Views Expressed section, relevant to issues and concerns raised by KML, related to each topic area. This information will be included in the EA report, as written and will be publicly available, once published.

Please review both documents for **accuracy** and return to us no later than **May 23rd, 2025**. Please note that if we do not receive comments by the deadline then this information will be included without KML's feedback. If you have any questions, please reach out to myself or Jes Way or we can discuss further at our meeting on May 14th.

Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnsc-ccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnsc-ccsn.gc.ca

I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis

Je reconnais que les terres sur lesquelles je vis et travaille sont le territoire traditionnel du Traité no 6 et la patrie des Métis

From: [Way, Jessica](#)
To: [Boser, Sydney](#); [Damien Georges](#);
Cc: [Noakes, Rain](#)
Subject: 2025-05-29 - KML-CNSC Meeting Minutes
Sent: 2025-06-06 9:49:46 AM

Hi Damien,

Please see below for the minutes from our meeting last week.

Have a great weekend.

Jes

KML-CNSC Meeting minutes

Date/time: May 29, 2025, 2-3pm SK time

Location: MS Teams

Attendees: Sydney Boser, Damien Georges, Greg Ross, Jes Way

Discussion:

- Damien reviewed the information provided with Greg Ross, and has a few comments:
 - Wondered about discussions around 3rd party monitoring with Denison; CNSC clarified that the excerpt shared from the Consultation Report for review is really focused on the consultation and the Rights Impact Assessment (RIA) work is still to come
 - Damien noted that probably quite a few of his questions are more for the RIA work, so would hold them for now; note, CNSC staff encouraged KML to share so that we have them, and they can be raised further down the line during the RIA discussions as well
 - KML confirmed the documentation in the Consultation Report and EA Report looks good and will pass along a map and a couple minor grammatical edits.
- RIA work:
 - Expecting these discussions to happen from Summer to fall, as the RIA will be provided as a supplemental for the December hearing
 - CNSC staff working on drafting content over the summer; RIA will look at mitigation and accommodation measures in more detail to mitigate any possible impacts to KML (commitments from Denison and CNSC for instance)
 - Will be drafted based on land use information, what we've heard from KML, etc.
- Questions:
 - When it comes to decommissioning, will this be considered in the RIA?

- Denison will be returning to the Commission before decommissioning for a licence, similar to license to Operate; currently applying for a licence to prepare site and construct
- KML indicated that from a Northern perspective, they aren't challenging the ability to meet environmental expectations, but have concerns about long term impacts of traditional harvesting and proactively looking at ensuring the end state does not have lasting impacts on traditional harvesting
 - There is still hesitation in the north in trusting long term outcomes of industry; most mines are still operating, and decommissioning for those that aren't hasn't gone well.
 - They want more confidence in industry, rather than waiting to see how well reclamation goes as success rates may not be as expected
- When it comes to RIA impacts, want to discuss impacts to future generations
- How is the future and managing change being considered in the EA?
 - Baseline conditions are a priority for CNSC, there may EA conditions related to baseline info, and where Denison has made commitments in their commitments report, this too will be come an EA condition, and thus a condition of their licence (all conditions will all need to be met)
 - If additional factors are being raised through the RIA or as a result of hearings (ie. If Denison makes commitments during the hearing), these are expected to be added to the commitments report and will become part of the licensing basis.
- KML is concerned about cumulative impacts:
 - Elder knowledge has demonstrated that there are cumulative impacts of various things happening (exploration, projects, other factors) are impacting traditional harvesting. For instance, when the highway was built, the impacts led to 5 years of dispersed animals and once animals relocate may not come back; is there a model that we have developed that measuring tool of outcome really does address long term impacts for traditional harvesting?
 - CNSC staff noted some of the challenges with assessing cumulative impacts given the various factors that can contribute to cumulative, how they are assessed, and who has oversight (ie. Exploration with the province; CEAA EAs having federal oversight but other projects not being subject to the same legislative requirements; deficiencies in assessing cumulative effects under CEAA 2012).
 - With the comments Damien is bringing to the table today, still a lot of on the ground questions with regards to impacts of exploration, outfitting and tourism; KML is concerned with having all sectors acknowledging the overlapping, cumulative impacts. CNSC staff acknowledged that how we look at cumulative effects is something we are evaluating.
- Does the CNSC have a mechanism to help support communication for KML from a translation standpoint?
 - Following a process such as this, when Damien and team bring the information back to the community, it can be challenging to adequately translate this back to locals – sharing in two languages

- Relationship between CNSC and Pinehouse has really grown over the last 20 years, but still struggling with making sure have effective communication at the local level. If there is any support that CNSC could provide to help bridge this interpretation, it would be helpful to KML.
 - CNSC staff noted that there are interpreters at the hearing, and that we are trying to find ways to bridge this gap; Sydney talked a bit about the listening tour that will be happening this summer and that they will be looking for feedback from KML on topics such as this.
- How is CNSC's relationship with the province?
 - KML indicated that the province allows for consideration of socioeconomic outcomes, but if not active in the process with the province (delegated duty to consult) makes it hard for them to influence
- CNSC listening tour:
 - This is an activity outside of the projects that are ongoing, led by another division - the Indigenous policy unit
 - They will be engaging with Nations this summer and collecting feedback, producing a What We Heard Report for CNSC's reconciliation journey, and feedback on the hearing process is one of these topics. Changes will be made based on feedback collected.
 - We would appreciate having KML meet the team and getting KML's participation - a letter and discussion guide was shared with KML and they are planning to do some of these meetings the week of July 7th. CNSC will be following up on this.
- Elder's gathering:
 - Damien noted that CNSC is presenting the Tuesday morning from 10 to 12, and Denison from 1 to 3
- Actions:
 - KML will send back a few comments for the documentation along with a PDF map reflecting KML land use
 - Jes will send along additional EA content reflecting KML's valued component information to ensure it has been adequately reflected - **complete**
 - Sydney will be sending along issues and concerns tables to ensure everything has been adequately captured
 - More to come from CNSC on the listening tour (possibly a meeting the week of July 7th)
 - No upcoming meetings scheduled; possibility to combine July meeting with listening tour meeting, and Sydney will schedule meeting for August.

Thanks,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213

British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.

From: [Damien Georges](#)
To: [Boser, Sydney](#)
Cc: [Froess, Ryan](#); [Way, Jessica](#); [Noakes, Rain](#);
Subject: Elder's Gathering Memo
Attachments: [Elder's Gathering Memo.pdf](#)
Sent: 2025-06-09 2:22:32 PM

Follow Up Flag: Follow up
Flag Status: Completed

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

Hey Sydney,

I just wanted to reach out to let you know about the current status of next week's meeting. The planning committee decided it was in the best interest to postpone next week's event due to the fire situation all over the north. Many of our neighbouring communities are still displaced, so we decided that we should wait until later in the summer to host the event.

I hope that you guys are able to join us in August. Attached is the official memo that went out today. Feel free to contact me if you have any other questions.

Thanks,

[Damien Georges, B.S.A](#)
Environment Manager
Kineepik Metis Local 9
Cell: 306-930-5320
Email: dgeorges@kineepik.ca



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This e-mail was intended for a specific recipient. It may contain information that is privileged, confidential or exempt from disclosure. Any privilege that exists is not waived. If you are not the intended recipient, do not distribute it to another person or use it for any other purpose. Please delete it and advise me by return e-mail or telephone. Thank you.

From: [Way, Jessica](#)
To: [Damien Georges](#)
Cc: [Boser, Sydney](#); [Noakes, Rain](#); [McKeown, Justin](#);
Subject: RE: For KML Review - Excerpt from EA report
Sent: 2025-06-15 8:29:08 AM

Hi Damien,

Thanks for getting back to us – I have made this edit.

Have a great week!

Jes

From: Damien Georges <dgeorges@kineepik.ca>
Sent: Thursday, June 12, 2025 4:40 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Boser, Sydney <sydney.boser@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>
Subject: Re: For KML Review - Excerpt from EA report

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE
--

Hey Jessica,

The only thing I would have to change would be the following:

"Churchill River system while some subsistence fishing has been documented on the waterbodies around the Key Lake Mine" would we be able to take out the "some" in subsistence, as I believe that people might take it the wrong way.

other than that, it looks good to go.

Thanks,

[Damien Georges, B.S.A](#)
Environment Manager
Kineepik Metis Local 9
Cell: 306-930-5320
Email: dgeorges@kineepik.ca



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From: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Sent: May 30, 2025 4:58 PM
To: Damien Georges <dgeorges@kineepik.ca>
Cc: Boser, Sydney <sydney.boser@cnsccsn.gc.ca>; Noakes, Rain <rain.noakes@cnsccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnsccsn.gc.ca>
Subject: For KML Review - Excerpt from EA report

Hi Damien,

In follow up to our call yesterday, here is the content that I noted we would be sending to KML for review. This is information included in the *Indigenous uses: Current use of lands and resources for traditional purposes* Section of the EA report.

Kineepik Métis Local #9

-

The Project is located within KML traditional lands and occupancy area, which covers approximately 15,000 km² and extends 250 km north of Cree Lake, west of Knee Lake, east to Russell Lake and south down to Emmeline Lake located between Beauval and La Ronge (NVP 2011). KML's cultural camp is located at kilometre 67 north of the community, which is along Highway #914. Hunting, fishing, and harvesting areas were primarily documented throughout the RSA, north along the Haultin River system and parallel to Highway #914. KML's land use and occupancy study results show dense moose harvesting sites along Highway #914 south of the Key Lake Mine gate within the RSA, as well as other large game harvesting sites noted around Cree and Russell lakes, but in very low concentrations. Trapping occurs closer to the community, and on the Churchill River system and Gordon Lake, neither of which are located within the RSA. Pinehouse is a strong fishing community with access to hundreds of lakes and rivers in the region. Commercial fishing takes place

along several lakes along the Churchill River system while some subsistence fishing has been documented on the waterbodies around the Key Lake Mine and the Wheeler River system west of the Key Lake at the Wheeler River bridge within the LSA. KML members also utilize the broader RSA to collect and gather berries and other edible/medicinal plants. Land use and occupancy studies also recorded birth, death, and burial sites, heritage cabins, and settlements in the region although none of these were recorded within the PA or LSA or north of the Key Lake Mine.

Sorry to be sending along more content after the initial reviews, but this section came together a bit later. If you could please let us know if you have any edits **before June 13th**, I'd appreciate it. It's a pretty short excerpt, so I hope that two weeks is enough time to review.

Have a wonderful weekend.

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale

Environmental Review Division | Division de l'examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.

From: [Boser, Sydney](#)
To: [Damien Georges](#)
Cc: [McKeown, Justin](#); [Way, Jessica](#); [Noakes, Rain](#);
Subject: CNSC & KML - Issues Tracking Table - For Review: Wheeler River
Attachments: [KML Issues Tracking Table Appendix A.2 - For Review.docx](#)
Sent: 2025-06-27 2:27:00 PM

Good afternoon Damien,

Please see attached the KML's issues tracking table for the Denison Wheeler River Project for your review. This tracking table includes concerns that KML has raised throughout the EA process for the Project and includes CNSC's response. This table will be appended to the Consultation Report for the Project in advance of the Part 1 hearing.

Please review the document for **accuracy** and return to us no later than **July 23rd, 2025**. Please note that if we do not receive comments by the deadline then this information will be included without KML's feedback. If you have any questions, please reach out to myself or Rain Noakes and we can discuss further at our meeting on the 10th.

Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnscccsn.gc.ca

I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis

Je reconnais que les terres sur lesquelles je vis et travaille sont le territoire traditionnel du Traité no 6 et la patrie des Métis

From: [Damien Georges](#)
To: [Boser, Sydney](#)
Subject: Re: CNSC & KML - Issues Tracking Table - For Review: Wheeler River
Sent: 2025-07-23 3:55:53 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hey Sydney,

I was able to review the table, and I think that it was very well thought out. We don't have any comments on this part of the Issues tracking table.

If you don't mind, I am going to add these into our issues tracking table so we can keep track of the issues moving forward. I look forward to meeting via teams tomorrow.

Thanks,

[Damien Georges, B.S.A](#)
Environment Manager
Kineepik Metis Local 9
Cell: 306-930-5320
Email: dgeorges@kineepik.ca



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From: Boser, Sydney <sydney.boser@cnscccsn.gc.ca>
Sent: July 17, 2025 3:30 PM
To: Damien Georges <dgeorges@kineepik.ca>
Cc: McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>
Subject: RE: CNSC & KML - Issues Tracking Table - For Review: Wheeler River

Good afternoon Damien,

I just wanted to send a reminder that the deadline to provide feedback on the issues tracking table is Wednesday July 23rd. I also notice that we don't have a next meeting set up on Denison. When would be a good time for KML to schedule our next meeting? If you send me some dates that work for you then I can send out an invite!

Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnscccsn.gc.ca

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From: Boser, Sydney

Sent: June 27, 2025 2:28 PM

To: Damien Georges <dgeorges@kineepik.ca>

Cc: McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>

Subject: CNSC & KML - Issues Tracking Table - For Review: Wheeler River

Good afternoon Damien,

Please see attached the KML's issues tracking table for the Denison Wheeler River Project for your review. This tracking table includes concerns that KML has raised throughout the EA process for the Project and includes CNSC's response. This table will be appended to the Consultation Report for the Project in advance of the Part 1 hearing.

Please review the document for **accuracy** and return to us no later than **July 23rd, 2025**. Please note that if we do not receive comments by the deadline then this information will be included without KML's feedback. If you have any questions, please reach out to myself or Rain Noakes and we can discuss further at our meeting on the 10th.

Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnscccsn.gc.ca

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B.4 Key Correspondence with Ya'thi Néné Lands and Resources

From: Phaneuf, Marcelle (CNSC/CCSN)
Sent: April 9, 2019 11:56 AM
Subject: CNSC receives project description for a new in situ recovery uranium mine

Good day,

On February 19, 2019, Denison Mines Corp. submitted a project description with the intent to develop an in situ recovery (ISR) uranium mine in the Athabasca Basin in northern Saskatchewan, 4 km west of Highway 914 and approximately 600 km north of Saskatoon.

If and when the project description is assessed by the Canadian Nuclear Safety Commission (CNSC) as complete, the next step would be to issue a notice of commencement. The project description would then become available for public comment as part of the environmental assessment process.

A formal letter of notification to your community with more information on the regulatory review process is forthcoming.

For more information on the CNSC's role in licensing uranium mines and mills, please visit:
<http://www.nuclearsafety.gc.ca/eng/uranium/mines-and-mills/index.cfm>

For more information on the CNSC's environmental assessment process, please visit:
<http://www.nuclearsafety.gc.ca/eng/resources/environmental-assessments/index.cfm>

Best regards,

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209



April 15, 2019

e-Doc: 5870914

Chief Bartholomew Tsannie
Hatchet Lake First Nation
General Delivery
Wollaston Lake, SK S0J 3C0
b-tsannie@hotmail.com

Subject: Notice of Denison Mines Corp., Wheeler River Project, a Proposal for a New Uranium Mining Project in northern Saskatchewan.

Dear Chief Tsannie:

The purpose of this letter is to provide you with notice that the Canadian Nuclear Safety Commission (CNSC) has received a project description from Denison Mines Corp. (Denison) to develop a uranium mine located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. The proposed development is called the Wheeler River Project.

The proposed project requires a federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and will require authorization from the CNSC under the *Nuclear Safety and Control Act* (NSCA).

The proposed project includes underground and surface facilities to support the mining and processing of uranium ore using the In Situ Recovery (ISR) mining method. The main components of the project include:

- an ISR wellfield
- two freeze plants on the surface to establish a frozen isolated mining chamber underground
- an on-site plant to process the mining solution recovered from the ISR wellfield
- surface facilities to support the short and long term storage of waste rock
- water handling infrastructure and a water treatment plant
- additional infrastructure to support mining activities including but not limited to a camp for personnel, and supporting facilities such as an airstrip, waste and water management facilities, maintenance shops, warehouses, and offices

Vehicle access to the site would be provided by constructing a seven-kilometre section of road connecting Provincial Highway 914 to the Wheeler River site and a five-kilometre road from the site to the airstrip.

Environmental Assessment and Licensing

As part of their application, Denison will be seeking sequential EA and licensing processes such that EA and licensing matters will be considered at separate public Commission hearings. The Commission must make an EA decision that the project will not cause significant adverse environmental effects prior to making a licensing decision. Denison has submitted a project description to initiate the EA process, but has not yet submitted a full licence application to initiate the licensing process.

The proposed project will require an EA under CEAA 2012. The CNSC will be responsible for making both an EA and a licensing decision for this project. The CNSC is also the Crown Consultation Coordinator for the federal government for the project.

The proposed project is also subject to a provincial environmental assessment as it is a “development” as defined in section 2(d) of *The Environmental Assessment Act*. Therefore, Denison is also required to undertake a provincial EA for the project and seek approval from the Saskatchewan Minister of Environment prior to proceeding with the project. CNSC and the Saskatchewan Environmental Assessment & Stewardship Branch will work closely to coordinate our respective EA processes wherever possible.

Commission Hearing

Before the Commission can make a decision on the licence application, a public hearing will be held to ensure that the Commission has the information it needs, and that Denison and interveners (including Indigenous groups and members of the public) have had a reasonable opportunity to present relevant information to the Commission. The CNSC encourages your participation in the review process, including the public hearing.

The Commission’s public hearing for the Wheeler River Project has not yet been scheduled. We will provide you with an update once further details are confirmed regarding the timing, location and format of the Commission hearing for this project.

For more details on CNSC’s public hearing processes, you can visit the web link:
<http://nuclearsafety.gc.ca/eng/the-commission/hearings/participate/index.cfm>.

Participant Funding Program

The CNSC has established a Participant Funding Program (PFP) to enhance participation in the CNSC’s regulatory processes. Funding for this project will be offered in two phases. The first phase will be for the review of the draft Environmental Impact Statement, while the second phase will be for the remainder of the regulatory process. The availability of the first phase of PFP will be announced within the next few months (around the same time as the Commission makes its decision on the scope

of the EA). Once the availability of funding is announced we will provide you with further details on the application process, scope of funding and amounts available.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>

If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccpfp@canada.ca.

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands the importance of consulting and building relationships with Canada's Indigenous peoples.

As an Indigenous group with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project and encourages you, during the review process, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project

Next Steps

Once the final project description has been submitted by Denison, CNSC staff will provide your community with further details on the federal EA process to be followed for the proposed project.

The CNSC will be posting a Notice of Commencement on the Canadian Environmental Assessment Registry within the next few weeks. At the same time as the posting of the Notice of Commencement, the CNSC will also post the project description for a 30 day review and comment period.

As part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the following documents:

- the project description
- the draft Environmental Impact Statement

Indigenous groups and members of the public will also be given the opportunity to submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation).

We are interested in meeting with your community in person, or by teleconference if preferred, to discuss the proposed project, and we would be happy to arrange for this to happen. Please note that the CNSC is also able to offer, upon request, participant funding for such meetings and other related activities to help enable your on-going participation and engagement throughout the EA and regulatory review process.

Staying Informed

The CNSC is committed to ongoing consultation and engagement with you and your Nation in relation to this proposed project and will be providing information updates directly to you at key points in the regulatory process.

In addition, if you wish to receive e-mail notifications when the CNSC's website is updated, including notices for hearings, meetings and PFP funding opportunities, you can sign-up to the CNSC mailing list by visiting the following web link and choosing the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact the Crown Consultation Coordinator on this file, Marcelle Phaneuf, by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,



Candida Cianci
Director, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Location of the proposed Wheeler River uranium mine project

Appendix B: Indigenous Consultation and Engagement at the CNSC (e-Doc: 5862079)

c.c.: Monique Thomas; P. Denechezhe (HLFN)
P. Fundarek, M. Landon, S. Akhter, M. Phaneuf, A. Levine, A. Zenobi (CNSC)
A. Sadik, B. England (SEASB)

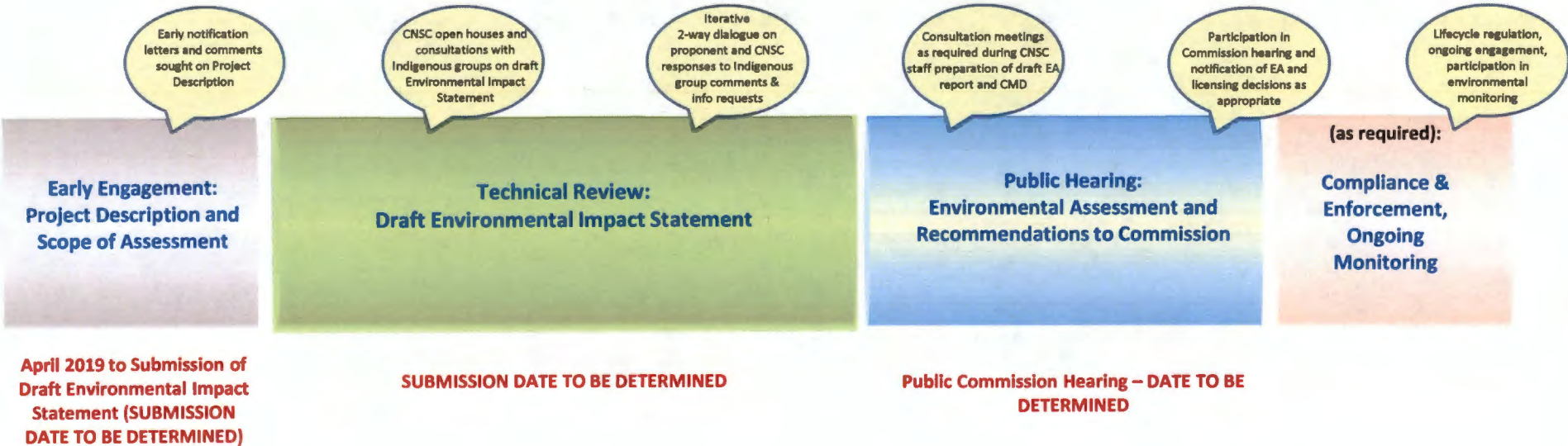
A similar letter was sent to the following groups:

- English River First Nation
- Hatchet Lake First Nation
- Birch Narrows Dene Nation
- Buffalo River Dene Nation
- Black Lake First Nation
- Fond-du-Lac Denesuline First Nation
- Ya'thi Néné Lands and Resource Office
- Prince Albert Grand Council
- Métis Nation of Saskatchewan (Northern Region 1)
- Kineepik Métis Local Pinehouse # 9 (Métis Northern Region 3)
- Meadow Lake Tribal Council

Appendix A: Location of the proposed Wheeler River uranium mine project



Appendix B: Indigenous Consultation and Engagement at the CNSC





April 15, 2019

e-Doc: 5870914

Chief Coreen Sayazie
Black Lake Denesuline First Nation
P.O. Box 27
Black Lake, SK S0J 0H0
csayazie@hotmail.com

Subject: Notice of Denison Mines Corp., Wheeler River Project, a Proposal for a New Uranium Mining Project in northern Saskatchewan.

Dear Chief Sayazie:

The purpose of this letter is to provide you with notice that the Canadian Nuclear Safety Commission (CNSC) has received a project description from Denison Mines Corp. (Denison) to develop a uranium mine located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. The proposed development is called the Wheeler River Project.

The proposed project requires a federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and will require authorization from the CNSC under the *Nuclear Safety and Control Act* (NSCA).

The proposed project includes underground and surface facilities to support the mining and processing of uranium ore using the In Situ Recovery (ISR) mining method. The main components of the project include:

- an ISR wellfield
- two freeze plants on the surface to establish a frozen isolated mining chamber underground
- an on-site plant to process the mining solution recovered from the ISR wellfield
- surface facilities to support the short and long term storage of waste rock
- water handling infrastructure and a water treatment plant
- additional infrastructure to support mining activities including but not limited to a camp for personnel, and supporting facilities such as an airstrip, waste and water management facilities, maintenance shops, warehouses, and offices

Vehicle access to the site would be provided by constructing a seven-kilometre section of road connecting Provincial Highway 914 to the Wheeler River site and a five-kilometre road from the site to the airstrip.

Environmental Assessment and Licensing

As part of their application, Denison will be seeking sequential EA and licensing processes such that EA and licensing matters will be considered at separate public Commission hearings. The Commission must make an EA decision that the project will not cause significant adverse environmental effects prior to making a licensing decision. Denison has submitted a project description to initiate the EA process, but has not yet submitted a full licence application to initiate the licensing process.

The proposed project will require an EA under CEAA 2012. The CNSC will be responsible for making both an EA and a licensing decision for this project. The CNSC is also the Crown Consultation Coordinator for the federal government for the project.

The proposed project is also subject to a provincial environmental assessment as it is a “development” as defined in section 2(d) of *The Environmental Assessment Act*. Therefore, Denison is also required to undertake a provincial EA for the project and seek approval from the Saskatchewan Minister of Environment prior to proceeding with the project. CNSC and the Saskatchewan Environmental Assessment & Stewardship Branch will work closely to coordinate our respective EA processes wherever possible.

Commission Hearing

Before the Commission can make a decision on the licence application, a public hearing will be held to ensure that the Commission has the information it needs, and that Denison and interveners (including Indigenous groups and members of the public) have had a reasonable opportunity to present relevant information to the Commission. The CNSC encourages your participation in the review process, including the public hearing.

The Commission’s public hearing for the Wheeler River Project has not yet been scheduled. We will provide you with an update once further details are confirmed regarding the timing, location and format of the Commission hearing for this project.

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<http://nuclearsafety.gc.ca/eng/the-commission/hearings/participate/index.cfm>.

Participant Funding Program

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of the EA). Once the availability of funding is announced we will provide you with further details on the application process, scope of funding and amounts available.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>

If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccpf@canada.ca.

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands the importance of consulting and building relationships with Canada's Indigenous peoples.

As an Indigenous group with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project and encourages you, during the review process, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project

Next Steps

Once the final project description has been submitted by Denison, CNSC staff will provide your community with further details on the federal EA process to be followed for the proposed project.

The CNSC will be posting a Notice of Commencement on the Canadian Environmental Assessment Registry within the next few weeks. At the same time as the posting of the Notice of Commencement, the CNSC will also post the project description for a 30 day review and comment period.

As part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the following documents:

- the project description
- the draft Environmental Impact Statement

Indigenous groups and members of the public will also be given the opportunity to submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation).

We are interested in meeting with your community in person, or by teleconference if preferred, to discuss the proposed project, and we would be happy to arrange for this to happen. Please note that the CNSC is also able to offer, upon request, participant funding for such meetings and other related activities to help enable your on-going participation and engagement throughout the EA and regulatory review process.

Staying Informed

The CNSC is committed to ongoing consultation and engagement with you and your Nation in relation to this proposed project and will be providing information updates directly to you at key points in the regulatory process.

In addition, if you wish to receive e-mail notifications when the CNSC's website is updated, including notices for hearings, meetings and PFP funding opportunities, you can sign-up to the CNSC mailing list by visiting the following web link and choosing the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact the Crown Consultation Coordinator on this file, Marcelle Phaneuf, by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,



Candida Cianci
Director, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Location of the proposed Wheeler River uranium mine project

Appendix B: Indigenous Consultation and Engagement at the CNSC (e-Doc: 5862079)

c.c.: Terri-Lynne Beavereye (BLDFN)
P. Fundarek, M. Landon, S. Akhter, M. Phaneuf, A. Levine, A. Zenobi (CNSC)
A. Sadik, B. England (SEASB)

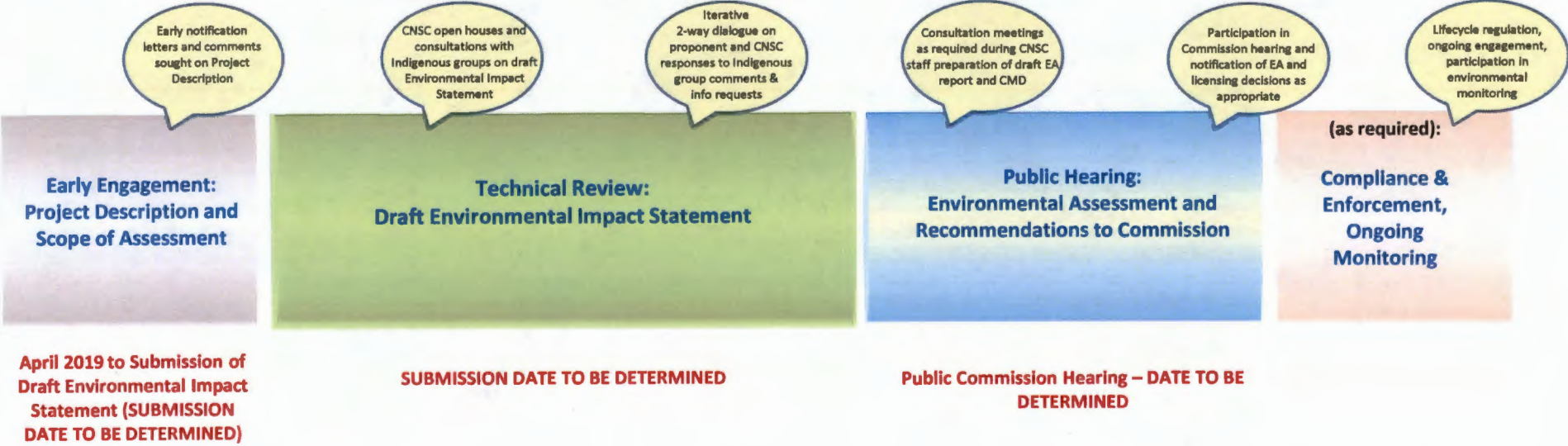
A similar letter was sent to the following groups:

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- Hatchet Lake First Nation
- Birch Narrows Dene Nation
- Buffalo River Dene Nation
- Black Lake First Nation
- Fond-du-Lac Denesuline First Nation
- Ya'thi Néné Lands and Resource Office
- Prince Albert Grand Council
- Métis Nation of Saskatchewan (Northern Region 1)
- Kineepik Métis Local Pinehouse # 9 (Métis Northern Region 3)
- Meadow Lake Tribal Council

Appendix A: Location of the proposed Wheeler River uranium mine project



Appendix B: Indigenous Consultation and Engagement at the CNSC





April 15, 2019

e-Doc: 5870914

Chief Louie Mercredi
Fond Du Lac Denesuline First Nation
P.O. Box 211
Fond Du Lac, SK S0J 0W0
louiemercredi.fdl@sasktel.net

Subject: Notice of Denison Mines Corp., Wheeler River Project, a Proposal for a New Uranium Mining Project in northern Saskatchewan.

Dear Chief Mercredi:

The purpose of this letter is to provide you with notice that the Canadian Nuclear Safety Commission (CNSC) has received a project description from Denison Mines Corp. (Denison) to develop a uranium mine located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. The proposed development is called the Wheeler River Project.

The proposed project requires a federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and will require authorization from the CNSC under the *Nuclear Safety and Control Act* (NSCA).

The proposed project includes underground and surface facilities to support the mining and processing of uranium ore using the In Situ Recovery (ISR) mining method. The main components of the project include:

- an ISR wellfield
- two freeze plants on the surface to establish a frozen isolated mining chamber underground
- an on-site plant to process the mining solution recovered from the ISR wellfield
- surface facilities to support the short and long term storage of waste rock
- water handling infrastructure and a water treatment plant
- additional infrastructure to support mining activities including but not limited to a camp for personnel, and supporting facilities such as an airstrip, waste and water management facilities, maintenance shops, warehouses, and offices

Vehicle access to the site would be provided by constructing a seven-kilometre section of road connecting Provincial Highway 914 to the Wheeler River site and a five-kilometre road from the site to the airstrip.

Environmental Assessment and Licensing

As part of their application, Denison will be seeking sequential EA and licensing processes such that EA and licensing matters will be considered at separate public Commission hearings. The Commission must make an EA decision that the project will not cause significant adverse environmental effects prior to making a licensing decision. Denison has submitted a project description to initiate the EA process, but has not yet submitted a full licence application to initiate the licensing process.

The proposed project will require an EA under CEAA 2012. The CNSC will be responsible for making both an EA and a licensing decision for this project. The CNSC is also the Crown Consultation Coordinator for the federal government for the project.

The proposed project is also subject to a provincial environmental assessment as it is a “development” as defined in section 2(d) of *The Environmental Assessment Act*. Therefore, Denison is also required to undertake a provincial EA for the project and seek approval from the Saskatchewan Minister of Environment prior to proceeding with the project. CNSC and the Saskatchewan Environmental Assessment & Stewardship Branch will work closely to coordinate our respective EA processes wherever possible.

Commission Hearing

Before the Commission can make a decision on the licence application, a public hearing will be held to ensure that the Commission has the information it needs, and that Denison and interveners (including Indigenous groups and members of the public) have had a reasonable opportunity to present relevant information to the Commission. The CNSC encourages your participation in the review process, including the public hearing.

The Commission’s public hearing for the Wheeler River Project has not yet been scheduled. We will provide you with an update once further details are confirmed regarding the timing, location and format of the Commission hearing for this project.

For more details on CNSC’s public hearing processes, you can visit the web link:
<http://nuclearsafety.gc.ca/eng/the-commission/hearings/participate/index.cfm>.

Participant Funding Program

The CNSC has established a Participant Funding Program (PFP) to enhance participation in the CNSC’s regulatory processes. Funding for this project will be offered in two phases. The first phase will be for the review of the draft Environmental Impact Statement, while the second phase will be for the remainder of the regulatory process. The availability of the first phase of PFP will be announced within the next few months (around the same time as the Commission makes its decision on the scope

of the EA). Once the availability of funding is announced we will provide you with further details on the application process, scope of funding and amounts available.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>

If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccfp@canada.ca.

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands the importance of consulting and building relationships with Canada's Indigenous peoples.

As an Indigenous group with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project and encourages you, during the review process, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project

Next Steps

Once the final project description has been submitted by Denison, CNSC staff will provide your community with further details on the federal EA process to be followed for the proposed project.

The CNSC will be posting a Notice of Commencement on the Canadian Environmental Assessment Registry within the next few weeks. At the same time as the posting of the Notice of Commencement, the CNSC will also post the project description for a 30 day review and comment period.

As part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the following documents:

- the project description
- the draft Environmental Impact Statement

Indigenous groups and members of the public will also be given the opportunity to submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation).

We are interested in meeting with your community in person, or by teleconference if preferred, to discuss the proposed project, and we would be happy to arrange for this to happen. Please note that the CNSC is also able to offer, upon request, participant funding for such meetings and other related activities to help enable your on-going participation and engagement throughout the EA and regulatory review process.

Staying Informed

The CNSC is committed to ongoing consultation and engagement with you and your Nation in relation to this proposed project and will be providing information updates directly to you at key points in the regulatory process.

In addition, if you wish to receive e-mail notifications when the CNSC's website is updated, including notices for hearings, meetings and PFP funding opportunities, you can sign-up to the CNSC mailing list by visiting the following web link and choosing the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact the Crown Consultation Coordinator on this file, Marcelle Phaneuf, by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,



Candida Cianci
Director, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Location of the proposed Wheeler River uranium mine project

Appendix B: Indigenous Consultation and Engagement at the CNSC (e-Doc: 5862079)

c.c.: V. Fern (Font-Du-Lac Denesuline First Nation)
P. Fundarek, M. Landon, S. Akhter, M. Phaneuf, A. Levine, A. Zenobi (CNSC)
A. Sadik, B. England (SEASB)

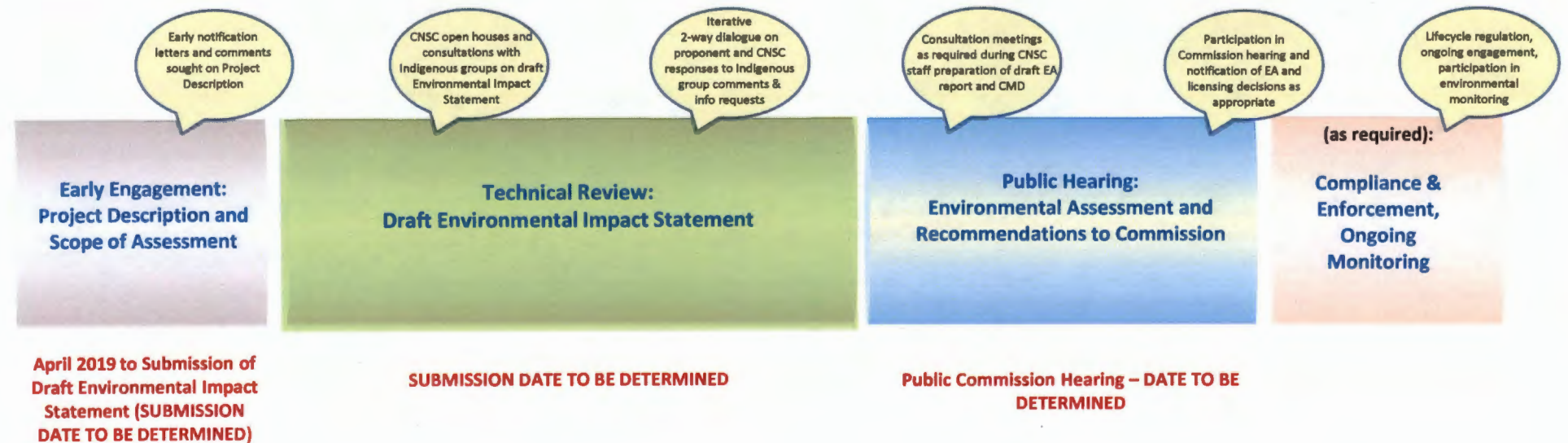
A similar letter was sent to the following groups:

- English River First Nation
- Hatchet Lake First Nation
- Birch Narrows Dene Nation
- Buffalo River Dene Nation
- Black Lake First Nation
- Fond-du-Lac Denesuline First Nation
- Ya'thi Néné Lands and Resource Office
- Prince Albert Grand Council
- Métis Nation of Saskatchewan (Northern Region 1)
- Kineepik Métis Local Pinehouse # 9 (Métis Northern Region 3)
- Meadow Lake Tribal Council

Appendix A: Location of the proposed Wheeler River uranium mine project



Appendix B: Indigenous Consultation and Engagement at the CNSC





April 15, 2019

e-Doc: 5875198

Garrett Schmidt
Yáthi Néné Land and Resource Office
Box 310
Fond Du Lac, SK S0J 0W0
Garrett.schmidt@yathinene.com

Subject: Notice of Denison Mines Corp., Wheeler River Project, a Proposal for a New Uranium Mining Project in northern Saskatchewan.

Dear Mr. Schmidt:

The purpose of this letter is to provide you with notice that the Canadian Nuclear Safety Commission (CNSC) has received an project description from Denison Mines Corp. (Denison) to develop a uranium mine located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. The proposed development is called the Wheeler River Project.

The proposed project requires a federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and will require authorization from the CNSC under the *Nuclear Safety and Control Act* (NSCA).

The proposed project includes underground and surface facilities to support the mining and processing of uranium ore using the In Situ Recovery (ISR) mining method. The main components of the project include:

- an ISR wellfield
- two freeze plants on the surface to establish a frozen isolated mining chamber underground;
- an on-site plant to process the mining solution recovered from the ISR wellfield
- surface facilities to support the short and long term storage of waste rock
- water handling infrastructure and a water treatment plant
- additional infrastructure to support mining activities including but not limited to a camp for personnel, and supporting facilities such as an airstrip, waste and water management facilities, maintenance shops, warehouses, and offices

Vehicle access to the site would be provided by constructing a seven-kilometre section of road connecting Provincial Highway 914 to the Wheeler River site and a five-kilometre road from the site to the airstrip.

Environmental Assessment and Licensing

As part of their application, Denison will be seeking sequential EA and licensing processes such that EA and licensing matters will be considered at separate public Commission hearings. The Commission must make an EA decision that the project will not cause significant adverse environmental effects prior to making a licensing decision. Denison has submitted a project description to initiate the EA process, but has not yet submitted a full licence application to initiate the licensing process.

The proposed project will require an EA under CEAA 2012. The CNSC will be responsible for making both an EA and a licensing decision for this project. The CNSC is also the Crown Consultation Coordinator for the federal government for the project.

The proposed project is also subject to a provincial environmental assessment as it is a “development” as defined in section 2(d) of *The Environmental Assessment Act*. Therefore, Denison is also required to undertake a provincial EA for the project and seek approval from the Saskatchewan Minister of Environment prior to proceeding with the project. CNSC and the Saskatchewan Environmental Assessment & Stewardship Branch will work closely to coordinate our respective EA processes wherever possible.

Commission Hearing

Before the Commission can make a decision on the licence application, a public hearing will be held to ensure that the Commission has the information it needs, and that Denison and interveners (including Indigenous groups and members of the public) have had a reasonable opportunity to present relevant information to the Commission. The CNSC encourages your participation in the review process, including the public hearing.

The Commission’s public hearing for the Wheeler River Project has not yet been scheduled. We will provide you with an update once further details are confirmed regarding the timing, location and format of the Commission hearing for this project.

For more details on CNSC’s public hearing processes, you can visit the web link:
<http://nuclearsafety.gc.ca/eng/the-commission/hearings/participate/index.cfm>.

Participant Funding Program

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Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>

If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnscc.pfp.ccsn@canada.ca.

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands the importance of consulting and building relationships with Canada's Indigenous peoples.

As an Indigenous group with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project.

Next Steps

Once the final project description has been submitted by Denison, CNSC staff will provide your community with further details on the federal EA process to be followed for the proposed project.

The CNSC will be posting a Notice of Commencement on the Canadian Environmental Assessment Registry within the next few weeks. At the same time as the posting of the Notice of Commencement, the CNSC will also post the project description for a 30 day review and comment period.

As part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the following documents:

- the project description
- the draft Environmental Impact Statement.

Indigenous groups and members of the public will also be given the opportunity to submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation).

Staying Informed

The CNSC is committed to ongoing consultation and engagement with you and your Nation in relation to this proposed project and will be providing information updates directly to you at key points in the regulatory process.

In addition, if you wish to receive e-mail notifications when the CNSC's website is updated, including notices for hearings, meetings and PFP funding opportunities, you can sign-up to the CNSC mailing list by visiting the following web link and choosing the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

If you have any questions relating to this project during the EA process, please contact the Crown Consultation Coordinator on this file, Marcelle Phaneuf, by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,

C. Cianci

Candida Cianci
Director, Environmental Assessment Division
Canadian Nuclear Safety Commission

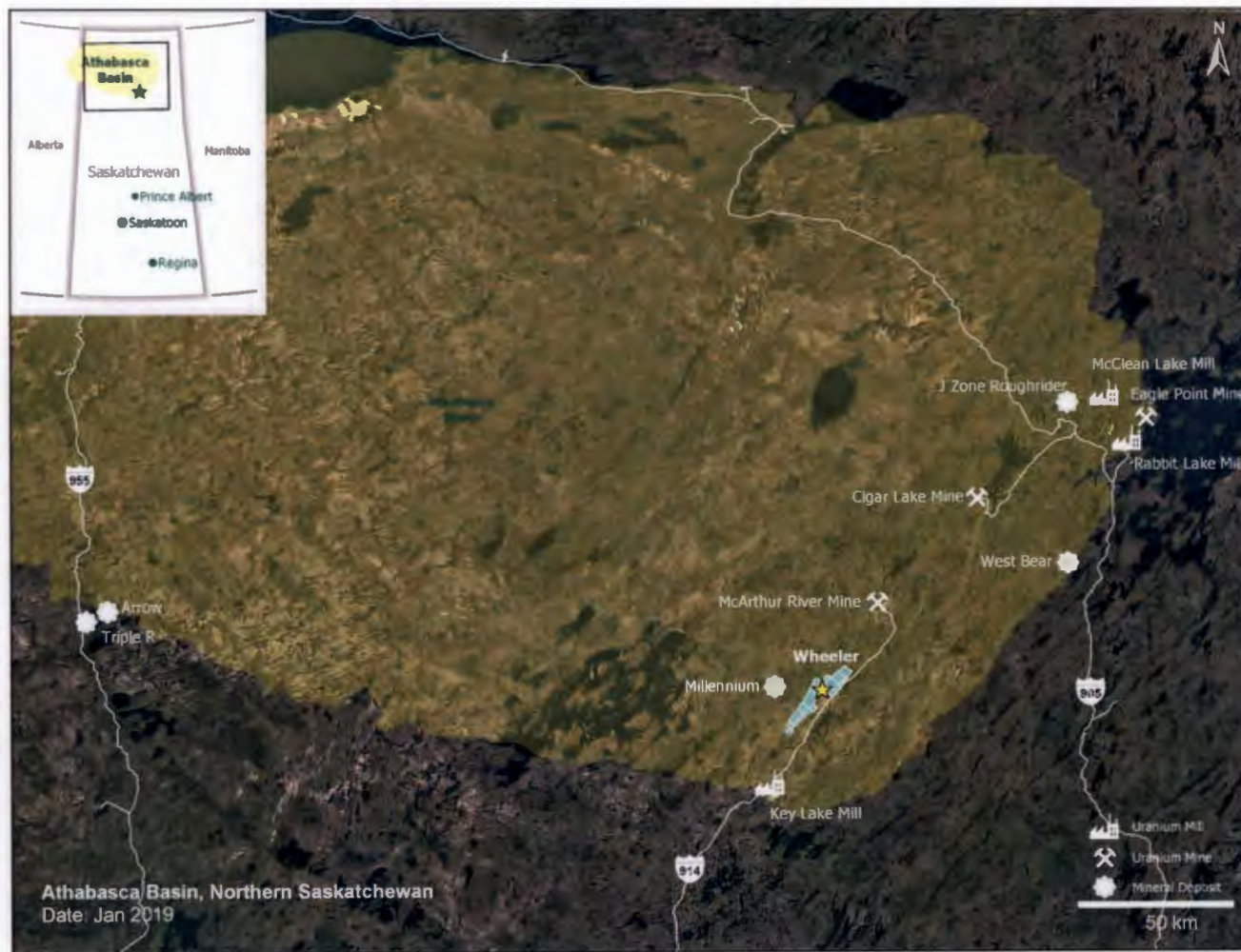
Enclosure: Appendix A: Location of the proposed Wheeler River uranium mine project
 Appendix B: Indigenous Consultation and Engagement at the CNSC (e-Doc: 5862079)

c.c.: L. McNabb (Ya'thi Néné Lands and Resource Office)
 P. Fundarek, M. Landon, S. Akhter, M. Phaneuf, A. Levine, A. Zenobi (CNSC)
 A. Sadik, B. England (SEASB)

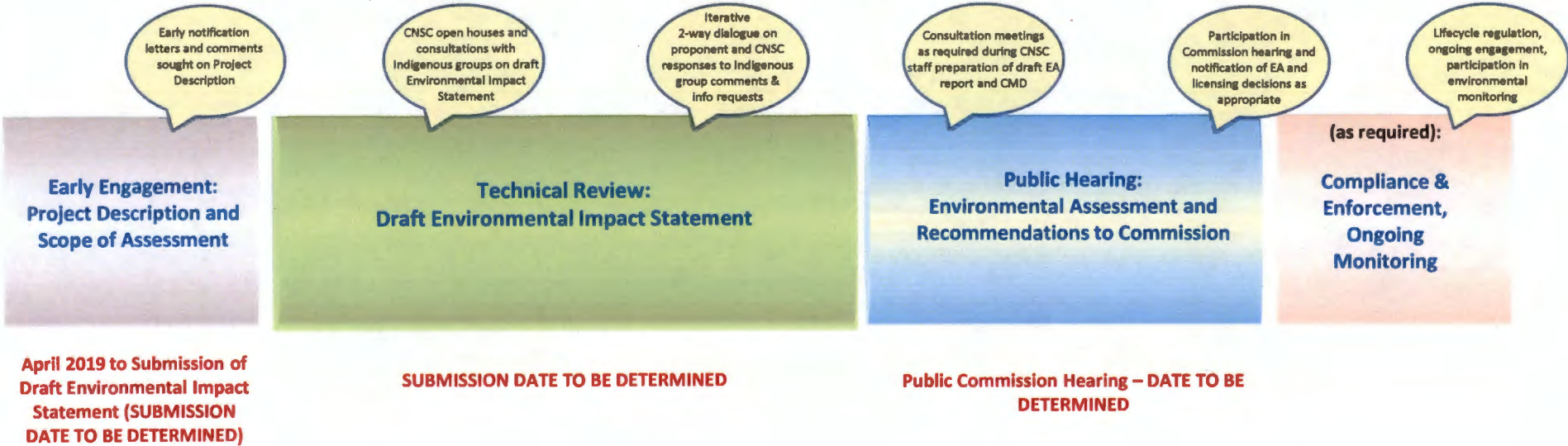
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- Hatchet Lake First Nation
- Birch Narrows Dene Nation
- Buffalo River Dene Nation
- Black Lake First Nation
- Fond-du-Lac Denesuline First Nation
- Ya'thi Néné Lands and Resource Office
- Prince Albert Grand Council
- Métis Nation of Saskatchewan (Northern Region 1)
- Kineepik Métis Local Pinehouse # 9 (Métis Northern Region 3)
- Meadow Lake Tribal Council

Appendix A: Location of the proposed Wheeler River uranium mine project



Appendix B: Indigenous Consultation and Engagement at the CNSC



From: Phaneuf, Marcelle (CNSC/CCSN)
'b-tsannie@hotmail.com'; 'nvp.glen@sasktel.net';
'leonardmontgrand@yahoo.ca'; 'csayazie@hotmail.com';
'louiemercredi.fdl@sasktel.net'; 'Garrett.schmidt@yathinene.com';
'chief1@birchnarrows.ca'; 'lawrence.mcintyre@erfn.net';
'receptionist@mltc.net'; 'eileenmorrison62@yahoo.ca';
To: 'nvp.mike@sasktel.net'; 'mcalette@mns.work'; 'jtsanniejr@pagc.net';
'mcalette@mns.work'; 'b.merasty@mns.work'; 'geraldmorin@hotmail.com';
'earl.cook@nortep.ca'; 'tlbbeavereye@hotmail.com';
'clhmercredi@sasktel.net'; 'victorf@sasktel.net'; 'fdreception@sasktel.net';
'Linda.mcnabb@yathinene.com'; 'bandmanager@birchnarrows.ca';
'cheyenna.campbell@desnedhe.com'; 'vince.pinehousedc@sasktel.net';
'creemancan@gmail.com';
Subject: Public comment period on the Project Description for the proposed
Wheeler River Project – Denison Mines Corp.
Sent: 2019-05-31 4:07:00 PM

Follow Up Flag: Follow up

Flag Status: Flagged

Good afternoon,

The Canadian Nuclear Safety Commission (CNSC) is [seeking comments](#) from the public and Indigenous groups on the project description for the proposed Wheeler River Project (<https://www.ceaa.gc.ca/050/documents/p80178/130098E.pdf>).

The project involves the construction of a new uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine.

The CNSC reviewed the project description and determined that it was written in accordance with the Prescribed Information for the Description of a Designated Project Regulations. (These regulations are made under the Canadian Environmental Assessment Act, 2012). Detailed information about the project will be available in the environmental impact statement, which Denison Mines Corp., the proponent, will submit at a later stage of the environmental assessment (EA) process.

Comments on the project description should be based on local, regional or traditional knowledge of the site or surrounding environment, or provide any other relevant information that may help with the conduct of the EA. All comments received will be considered public.

Written comments must be submitted by June 30, 2019, to:

Marcelle Phaneuf, Environmental Assessment Officer

Canadian Nuclear Safety Commission
P.O. Box 1046 Station B
280 Slater Street
Ottawa ON K1P 5S9
Telephone: 613-947-3209 or 1-800-668-5284
Fax: 613-995-5086
Email: cnscc.ea-ee.ccsn@canada.ca

Following receipt of comments on the project description, CNSC staff will consider all submissions received and make recommendations to inform the Commission's decision on the scope of the factors to be considered in the EA. In addition, CNSC staff will respond to all comments received from members of the public and Indigenous groups. The comments and responses will be placed in a table and publicly posted to the Canadian Environmental Assessment Registry. Effort will be made to group common issues together.

Following the Commission's decision on the EA scope, Denison Mines Corp. will then be required to provide to the CNSC an environmental impact statement (EIS) for review. An EIS is a report that a proponent writes to present the technical studies and findings of an EA. The CNSC's Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012 (<http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>) provide general instructions on preparing the EIS and information that must be included in it in order to comply with CEAA 2012 requirements.

If you have any questions, please do not hesitate to contact me at marcelle.phaneuf@canada.ca or by telephone at 613-947-3209.

Kind regards,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: Way, Jessica (CNSC/CCSN) on behalf of [EnvironmentalAssessment / ÉvaluationEnvironnementale \(CNSC/CCSN\)](#)
To: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
Subject: FW: Denison Mines Submission - Ya'thi Nene Land and Resource
Attachments: [Denison Mines Submission - Final.pdf;ATT00001.htm](#);
Sent: 2019-07-02 6:15:52 AM

Follow Up Flag: Follow up
Flag Status: Flagged

From: Michael Dawe <michael.dawe@yathinene.com>
Sent: June 29, 2019 9:21 AM
To: EnvironmentalAssessment / ÉvaluationEnvironnementale (CNSC/CCSN) <cnscc.ea-ee.ccsn@canada.ca>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: Denison Mines Submission - Ya'thi Nene Land and Resource

Attention Marcelle Phaneuf, Environmental Assessment Officer

Attached please find the written submission from the Ya'thi Nene Land and Resource Office on the Denison Mines Wheeler River Project.

Michael L. Dawe, M.SEM | tel [639.998.2338](tel:639.998.2338)
Environmental Consultant
Saskatoon, SK
michael.dawe@yathinene.com

From: Phaneuf, Marcelle (CNSC/CCSN)
'cheyenna.campbell@desnedhe.com'; 'csayazie@hotmail.com';
'tlbbeavereye@hotmail.com'; 'louiemercredi.fdl@sasktel.net';
'clhmercredi@sasktel.net'; 'victorf@sasktel.net'; 'fdlreception@sasktel.net';
'b-tsannie@hotmail.com'; 'moniquethomas2016@gmail.com';
'pdenechezhe@gmail.com'; 'nvp.glen@sasktel.net';
'leonardmontgrand@yahoo.ca'; 'mcalette@mns.work';
Bcc: 'b.merasty@mns.work'; 'geraldmorin@hotmail.com';
'earl.cook@nortep.ca'; 'nvp.mike@sasktel.net';
'vince.pinehousedc@sasktel.net'; 'chief1@birchnarrows.ca';
'bandmanager@birchnarrows.ca'; 'elmercampbell35@gmail.com';
'receptionist@mltc.net'; 'jtsanniejr@pagc.net'; 'creemancan@gmail.com';
'garrett.schmidt@yathinene.com'; 'Linda.mcnabb@yathinene.com';
'michael.dawe@yathinene.com'; Wylie, Doug (CNSC/CCSN); Zenobi, Adam
(CNSC/CCSN);
Subject: Wheeler River Project - Commission Decision on the scope of the EA
Sent: 2019-12-24 8:53:00 AM

Good day,

On December 20th, 2019, the Commission issued a decision on the scope of an environmental assessment for the proposed Wheeler River project. For your convenience, I have attached the Record of Decision to this email. You may also find it on the Registry [here](#).

In the next few weeks, the CNSC will send you a formal letter regarding this decision. The letter will also outline the next steps in the EA process as well as provide information related to participant funding (PFP) for this project.

As always, I am available for any questions or comments related to the Wheeler River project by phone or email.

Best regards and best wishes for the holiday season.

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#) on behalf of [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: ['Garrett Schmidt'](#)
Subject: Letter re Notice of Commission Decision on Scoping of EA for Wheeler River Project and Next Steps
Sent: 2020-03-20 2:35:49 PM

Dear Mr Schmidt,

The purpose of the attached letter is to notify you that on December 20, 2019, the Canadian Nuclear Safety Commission (CNSC) made a decision on the scope of factors to be considered in the environmental assessment of the Wheeler River Project (the Project) proposed by Denison Mines Corp (Denison). The letter also informs you of the next steps in the EA process, including the fact that Denison Mines Corp has suspended activities on the environmental assessment.

I remain available for any questions or comments by phone or email,

Best regards

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada

marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique

Commission canadienne de sûreté nucléaire / Gouvernement du Canada

marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: ['Garrett Schmidt'; 'victorf@sasktel.net';](#)
[Fundarek, Peter \(CNSC/CCSN\); Nana-Owusua Kwamena \(CNSC/CCSN\) \(nana-owusua.kwamena@canada.ca\);](#) Cattrysse, Clare (CNSC/CCSN); [Akhter, Salman \(CNSC/CCSN\);](#) [Froess, Ryan \(CNSC/CCSN\);](#) [Zenobi, Adam \(CNSC/CCSN\);](#) ['Sadik, Aimann ENV';](#) [England, Brianne ENV;](#)
Cc:
Subject: Update Letter re Wheeler River Project and Next Steps
Attachments: [E-DOCS-#6490501-v1-2021-02-15_-_Letter_-_CNSC_to_YNLRO_-_Restart_of_EA_activities.PDF](#)
Sent: 2021-02-15 9:15:00 AM

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Schmidt,

The purpose of the attached letter is to provide you an update on the status of the proposed Wheeler project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including the potential for consultation with the CNSC.

I remain available for any questions or comments by phone or email,

Best regards
Marcelle Phaneuf

Marcelle Phaneuf, M.Sc

Environmental Assessment Specialist, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 343-551-4196 ** NEW**

Spécialiste en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 343-551-4196 ** NOUVEAU**



February 15th, 2021

e-Doc: 6481620

Garrett Schmidt
Yá thi Néné Land and Resource Office
Box 310
Fond Du Lac, SK S0J 0W0
Garrett.schmidt@yathinene.com

Subject: Notice of restart of activities on the Federal Environmental Assessment (EA) for Denison Mines' Proposed Wheeler River Project

Dear Mr. Schmidt,

The purpose of this letter is to notify you that Denison Mines Corp (Denison) has notified the CNSC that they have resumed Environmental Assessment (EA) activities related to the Wheeler River Project (the Project) on January 01, 2021, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The CNSC has also received a revised project description from Denison Mines Corp. for the Wheeler River Project (<https://www.ceaa-acee.gc.ca/050/evaluations/proj/80178>). The revisions do not constitute material changes to the project and therefore public consultation is not required.

Current Status and Next Steps

In addition to notifying Yá thi Néné Land and Resource Office, the CNSC has directly contacted Black Lake Denesuline First Nation, Fond-du-Lac Denesuline First Nation and Hatchet Lake Denesuline First Nation, and is interested in hearing any views they may have with respect to the Project.

The next step in the EA process will be the submission by Denison of a draft Environmental Impact Statement (EIS). Denison has indicated that this submission can be anticipated in early 2022.

As part of the EA process, Yá thi Néné Land and Resource Office (YNLRO) will have the opportunity to provide comments on Denison's draft EIS once it is submitted as part of the public review period. In later steps of the process, YNLRO will also have the opportunity to comment on CNSC staff's Environmental Assessment (EA) Report and Commission Member Document (CMD), and to submit comments to the Commission for an eventual EA Commission hearing as a written intervention and/or oral presentation.

In addition, CNSC staff will continue to reach out with offers to meet and conduct additional consultation and engagement activities throughout the EA process with YNLRO and the Nations and communities you represent. As an Indigenous organization with interest in this project, the CNSC is interested in hearing any views of the Nations you represent may have with respect to the project. The

CNSC encourages the YNLRO throughout the EA process and including but not limited to the review and comment periods, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns;
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures; and
- advise the CNSC of how you and your Nation(s) would like to be consulted by the Crown as part of the regulatory review process for this project.

In addition, the CNSC will be making funding available to support YNLRO's participation throughout the EA process through the CNSC's Participant Funding Program (PFP).

The first phase of PFP, for the review of the draft EIS, will be announced by May of 2021. The CNSC will be offering funding, to be disbursed among all eligible applicants, to help in the review of the draft EIS. A second phase of PFP will be announced at a later date, to help in the review of the EA report and CMD, and to prepare an intervention for an EA hearing. Please note that should additional funding be needed by YNLRO, beyond the funding that will be awarded through these PFP opportunities, requests or applications for additional funding will be considered by the CNSC on a case-by-case basis.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process for the Participant Funding Program: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>. If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccfp@canada.ca.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact me by phone at 343-551-4196 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,

Marcelle Phaneuf

Marcelle Phaneuf
Environmental Assessment Officer, Environmental Assessment Division
Canadian Nuclear Safety Commission

c.c.: V. Fern, FDLDFN
P. Fundarek, N. Kwamena, C. Cattrysse, S. Akhter, R. Froess, A. Zenobi, CNSC
A. Sadik, B. England, SEASB

From: [Froess, Ryan \(CNSC/CCSN\)](#)
To: ['Garrett Schmidt'](#)
Cc: [Phaneuf, Marcelle \(CNSC/CCSN\)](#); [Adam Zenobi \(CNSC/CCSN\)](#)
[\(adam.zenobi@canada.ca\)](#);
Subject: Denison Wheeler River Project and Next Steps
Sent: 2021-03-26 2:43:00 PM

Good afternoon Garrett,

I am following up on a letter that was sent by the CNSC to Ya'thi Néné Lands and Resource Office (YNLRO) and First Nation leadership from the Athabasca basin on February 15th, 2021, regarding the Wheeler River Project (the Project) proposed by Denison Mines Corp, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The purpose of the letter was to inform leadership and the YNLRO that Denison had notified the CNSC that they had resumed Environmental Assessment (EA) activities related to the Project.

I am reaching out on behalf of myself and Marcelle Phaneuf (EA specialist responsible for the proposed project at the CNSC). The CNSC would like to meet with YNLRO and leadership to provide an update on the status of the proposed Project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including consultation and engagement activities with YNLRO by the CNSC throughout the EA process. As Indigenous Nation(s) with direct interest in this project, the CNSC is interested in hearing any views you may have with respect to the project including but not limited too the following:

- any adverse impacts the project may have on the Nation's potential and/or established Indigenous and/or treaty rights;
- how specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated;
- opportunities to provide Indigenous knowledge to support determination of potential impacts and potential mitigation measures;
- advise the CNSC of how the Nation (s) would like to be consulted by the Crown as part of the regulatory review process for this project (e.g. opportunity to work together to develop a Terms of Reference or plan for consultation for the Wheeler River Project EA and regulatory process).

In addition, as outlined in the letter the CNSC will be making funding available to support YNLRO's participation throughout the EA process through the CNSC's Participant Funding Program (PFP). The first phase of PFP, for the review of the draft EIS, will be announced by late Spring of 2021.

The CNSC is committed to building meaningful and long-term relationships with the YNLRO and the First Nations and the communities it represents. We would like to propose to set up a meeting with YNLRO in the spring of 2021 to discuss next steps in the EA and consultation

process, opportunities to collaborate early on in the EA process, and understand how the project may impact rights and interests.

We (are flexible and are looking forward to meeting virtually) on dates that work best for the Nations and communities you represent.

Thank you,

Ryan Froess
Senior Policy Advisor, Policy, Aboriginal, and International Relations Division
Canadian Nuclear Safety Commission
ryan.froess@canada.ca | Cell: 306-914-7892

Conseiller Principal des Politiques, Division des Politiques et des Affaires autochtones et Internationales
Commission Canadienne de Sûreté Nucléaire
ryan.froess@canada.ca | Cell: 306-914-7892

From: [Froess, Ryan](#)
To: [Way, Jessica](#)
Subject: FW: YNLRO/CNSC - NexGen/Denison EA Meeting - Follow-up
Sent: 2022-03-10 1:44:27 PM

FYI what we presented back in June.

From: Froess, Ryan
Sent: June 24, 2021 2:48 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Cc: b.hunter@watertight.ca; Shea Shirley <shea.shirley@yathinene.com>; Phaneuf, Marcelle <marcelle.phaneuf@cnsccsn.gc.ca>; Nicole Frigault (nicole.frigault@cnsccsn.gc.ca) <nicole.frigault@cnsccsn.gc.ca>; Adam Levine (adam.levine@cnsccsn.gc.ca) <adam.levine@cnsccsn.gc.ca>; Roy-Drainville, Cassandre <cassandre.roy-drainville@cnsccsn.gc.ca>
Subject: YNLRO/CNSC - NexGen/Denison EA Meeting - Follow-up

Hi Garrett,

Thanks for taking the time and the great meeting today with the CNSC on the two CEAA 2012 EA projects taking place in Northern Saskatchewan. We understand there was a lot to take in today so we will let you have some time to digest all of that information and discuss internally and perhaps we can schedule a meeting sometime in July to discuss a few of the topics in more detail that are of interest to YNLRO for the EA projects.

I have attached some materials we briefly mentioned in our meeting this morning. One is guidance the CNSC has provided to the proponents on Indigenous engagement expectations for CEAA 2012 and the second is some additional information on participation in the FPRT and the EA Reporting. Although we did not have time to go into much detail on these topics at our meetings today, there will be an opportunity to go into more details and ask questions in future meetings.

Also regarding Bill's questions and our discussion that took place on potential cumulative effects and how those are assessed under CEAA 2012 I have attached a few links below.

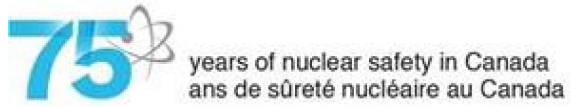
<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-under-canadian-environmental-assessment-act-2012.html>

<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-ceaa2012.html>

I will be in touch next week to find a time that works best for the YNLRO/CNSC staff to continue these discussions on this two EA projects for the summer months (July/August) and then we can go from there for future meetings into the fall.

Thanks again,

Ryan Froess
Senior Policy Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnsccsn.gc.ca | Cell: 306-914-7892





Wheeler River Project and Rook I Project

Environmental Assessment (EA) Process Overview and Indigenous participation





Agenda

1. Introduction
 - Wheeler River Project
 - Rook I Project
2. CEAA 2012 EA Process
3. Timelines
 - EA Timelines
 - Wheeler River Project Timelines
 - Rook I Project Timelines
4. Indigenous Consultation in the EA Process
5. Questions



Wheeler River Project

- Joint venture project owned by Denison Mines Corp and JCU Canada Exploration Company Ltd.
- Proposed uranium mine and processing plant in the eastern area of the Athabasca Basin region
- *In situ* recovery mining process and precipitation processing plants
- Closed loop process reusing water from precipitation process to inject into *in situ* recovery mining

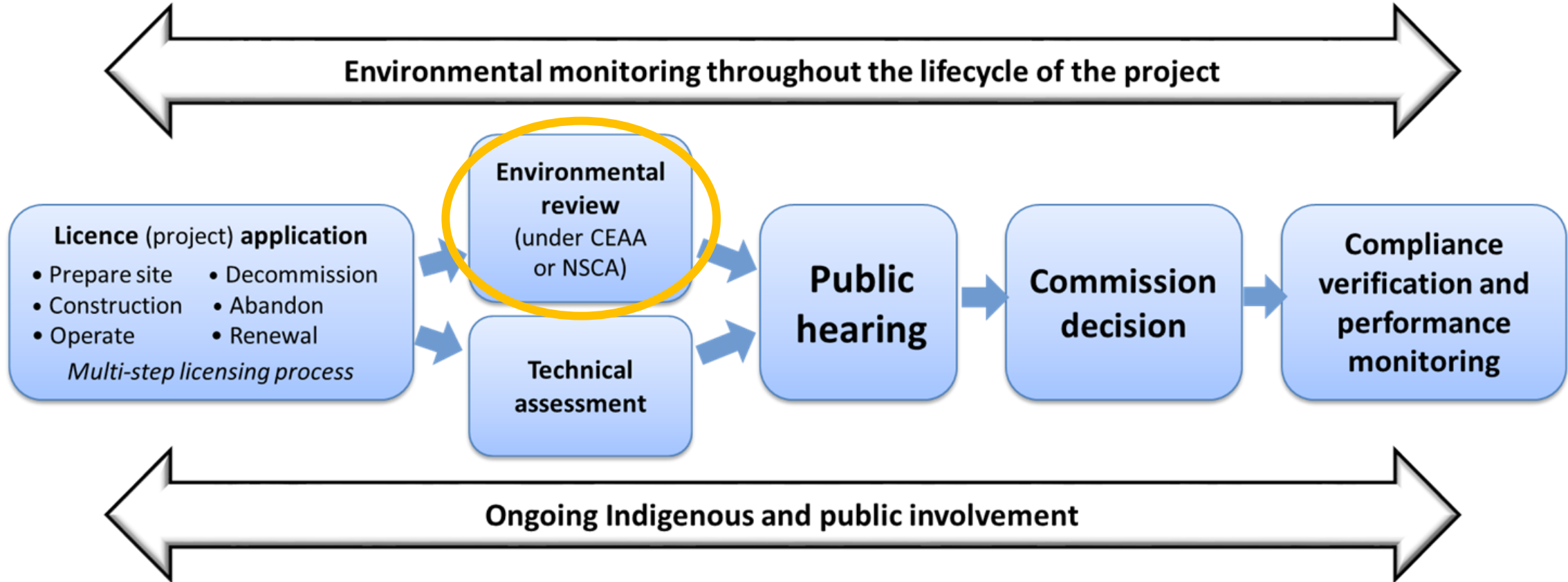
Rook I Project

- Owned by NexGen Energy Ltd.
- Proposed uranium mine and mill development in the southwestern area of Athabasca Basin region
- Underground and surface facilities to support mining and processing of uranium ore
 - Underground mining
 - On-site milling
 - Surface facilities for storage of waste
 - Underground tailings management facility
 - Effluent treatment centre



Environmental Assessment Process – CEAA 2012 Environmental Assessments

Environmental Protection Framework



Proponents must demonstrate that they have made adequate provisions for the protection and health and safety of people and the environment

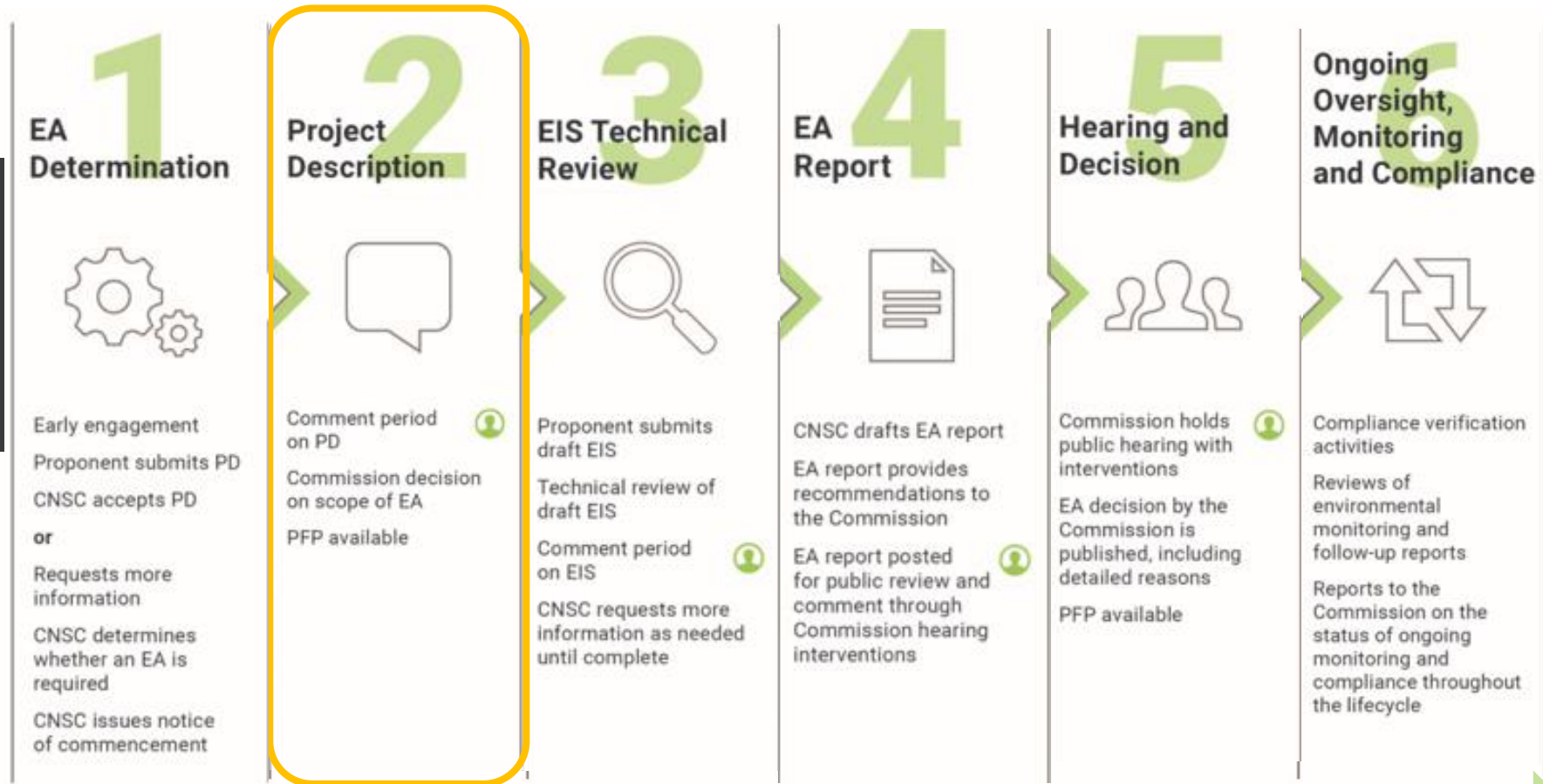


Environmental Assessment Process

Canadian Environmental Assessment Act, 2012

Legend

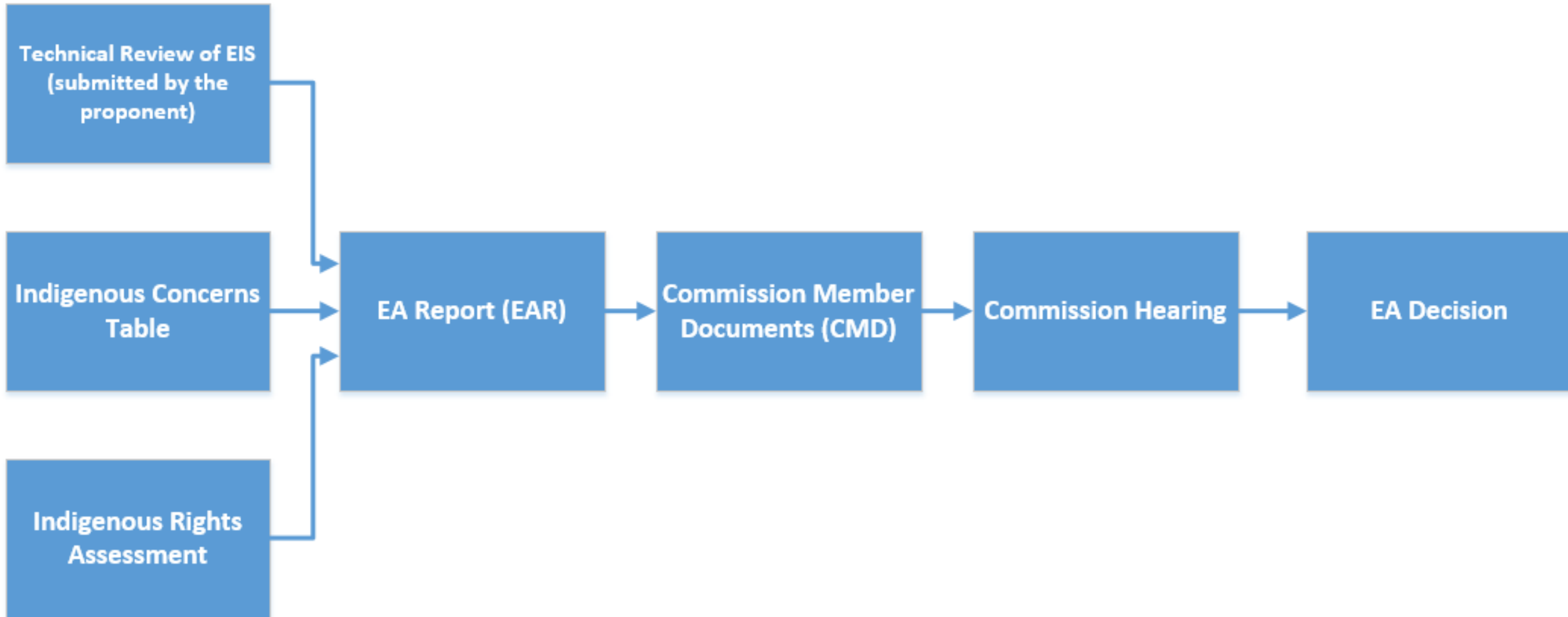
EA: Environmental Impact Assessment
PD: Project Description
EIS: Environmental Impact Statement
PFP: Participant Funding Program
👤 : Formal Participation Opportunity



Ongoing public engagement and Indigenous Consultation throughout the EA Process



Outputs of the EA process



EA Report: Commitments and Conditions

CNSC staff
prepares EA
Report and
Potential
Conditions

EA Report:

- EA process and findings:
 - potential environmental effects and impacts to communities;
 - mitigation measures
 - outstanding issues
- conclusions on the potential for the Project to cause significant adverse environmental effects
- how concerns from Indigenous groups and the public have been addressed

Potential Conditions:

Potential conditions are drafted, based on key mitigation measures and follow-up programs and would be enforceable with an EA decision.

Proponent
prepares
Commitments
Report

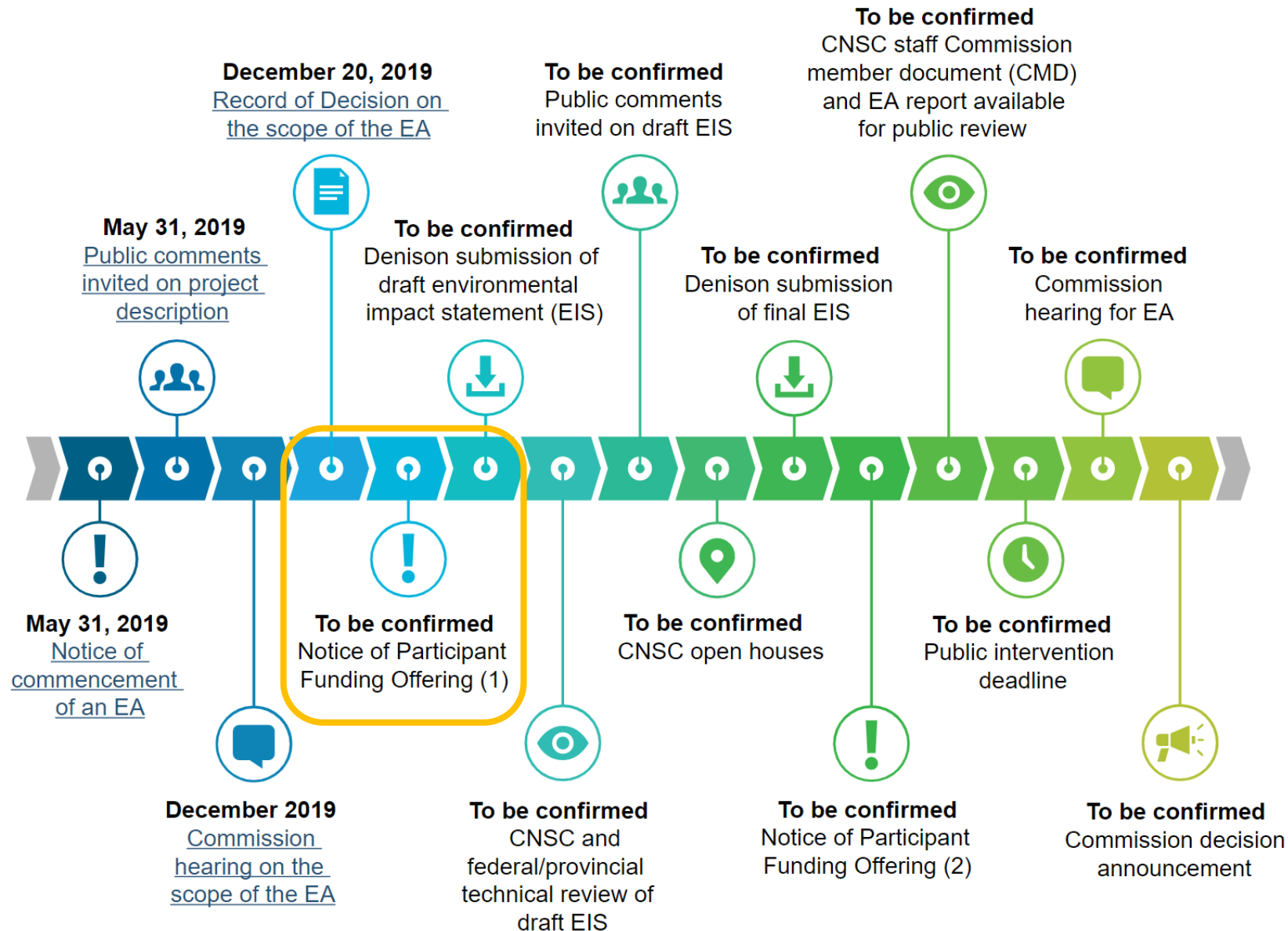
- lists all the commitments made by the proponent in the EIS and in engagement with Indigenous groups
- intended to be captured in a licence condition



Environmental Assessment Process – Timelines

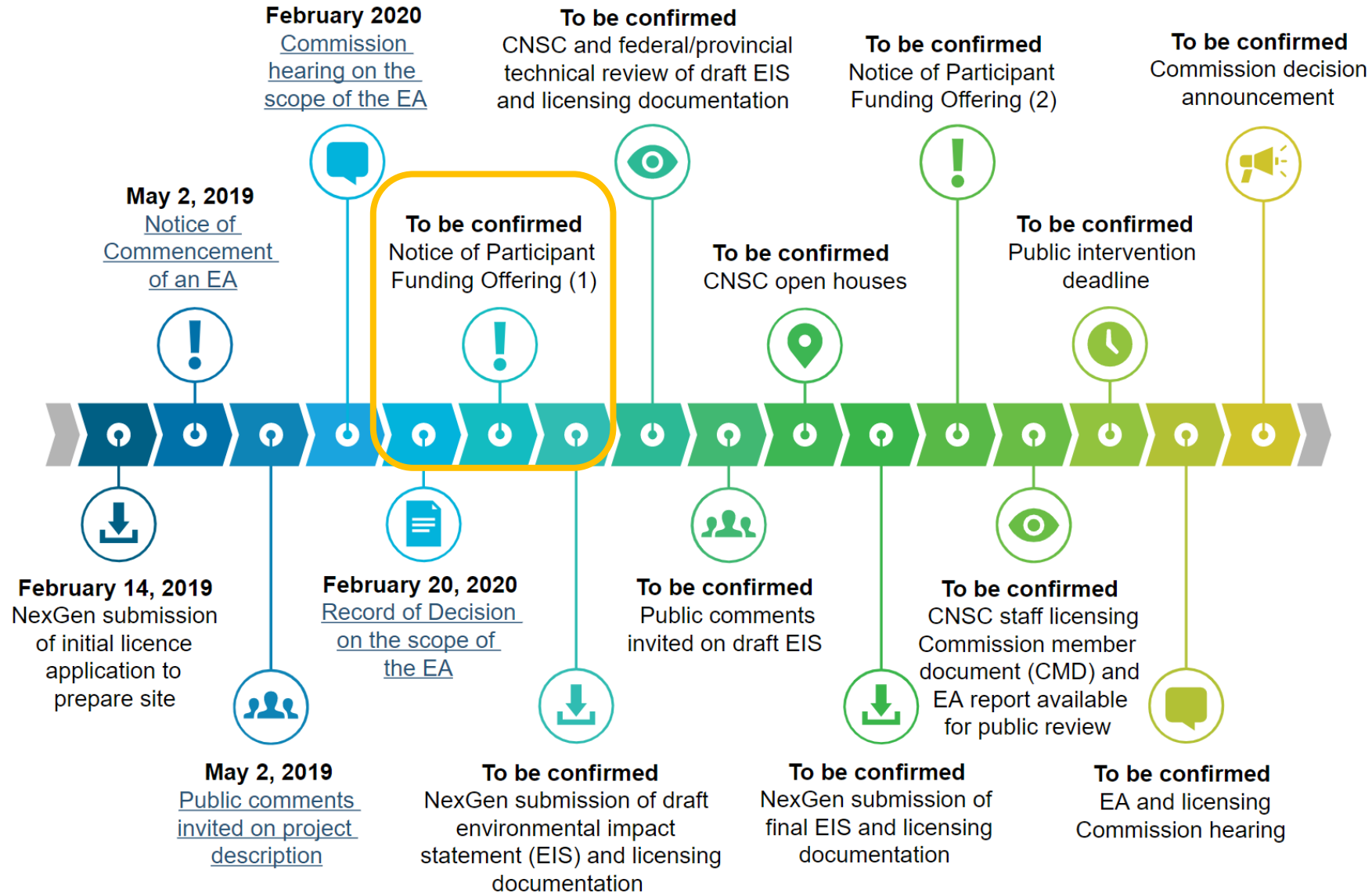


Wheeler River Project





Rook I Project





CEAA 2012 EA Process – Indigenous Consultation



Indigenous Engagement and Consultation

Engagement

- CNSC requires licensees to engage with potentially affected Indigenous peoples early in the development and throughout the life of their project

Consultation

- As an agent of the Crown, CNSC consults with potentially impacted Indigenous peoples to understand and address potential impacts to Indigenous and/or treaty rights from a project
- CNSC leads a whole-of-government approach to improve the efficiency/effectiveness of engagement and consultation processes

Building long-term positive and trusted relationships with Indigenous peoples in Canada

Importance of Indigenous Participation in the EA Process

***Incorporate
traditional
knowledge***

Understand the effects and potential impacts of the project on potential or established Indigenous or Treaty Rights

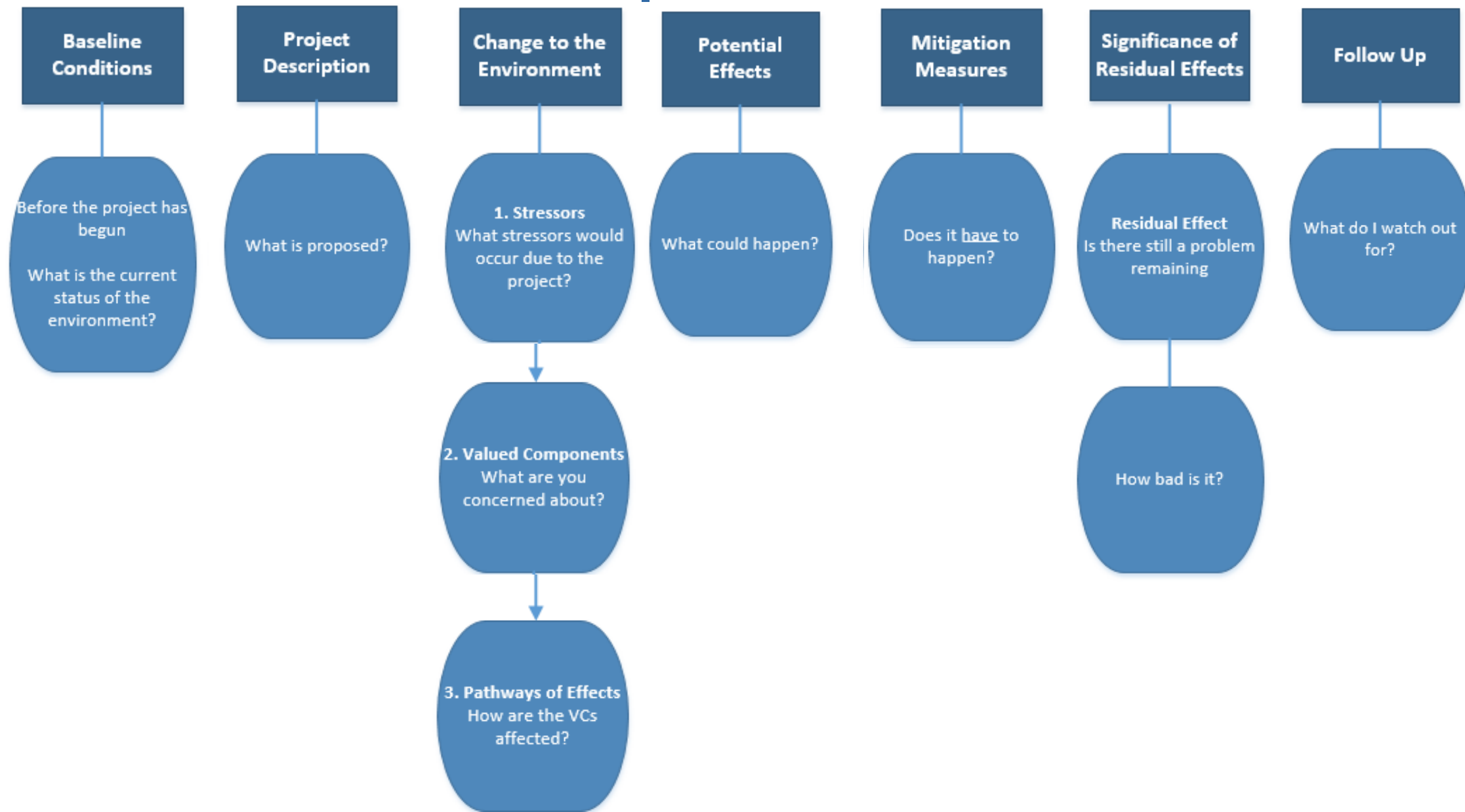
Ensure mitigation and accommodation is considered to address effects and potential impacts

Determine significance of adverse effects

The CNSC looks at potential impacts on the ability to exercise potential and established Indigenous and Treaty Rights in the future, should the project be allowed to proceed.

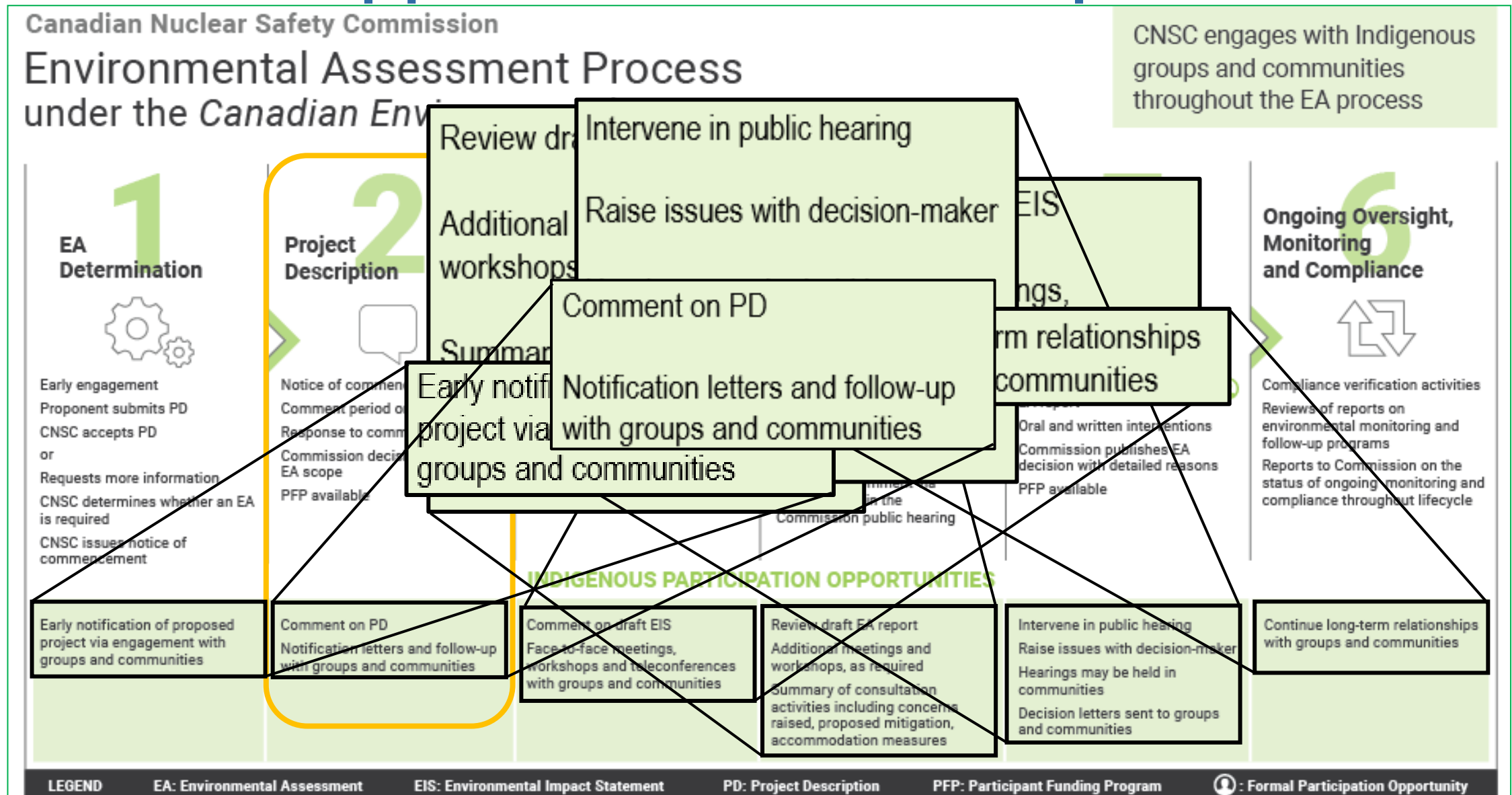


Environmental Impact Assessment (EIS) Story





Opportunities to Participate





Indigenous Participation in the EA Process and EA Report

CNSC offers the following to potentially impacted indigenous groups:

- Regular correspondence and meetings to provide project updates throughout
- Completion of Traditional Knowledge and Land Use Studies
- Public comment periods (on the project description, draft EIS)
- Signing of Terms of References for consultation (if desired)
- Consultation on CEAA 2012 section 5(1)(c) effects due to the project
- Issues and Concerns Tables
- Participation on the Federal and Provincial Review Team for the draft EIS
- Review of relevant sections of the EA Report (Chapters 6, 7, 8, 9)
- Collaborative drafting of Rights Impact Assessments

Funding is available for the activities listed above



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

Canada

Connect With Us

Thank You! Questions?



nuclearsafety.gc.ca



From: [Froess, Ryan](#)
To: [Way, Jessica](#)
Subject: FW: YNLRO/CNSC - NexGen/Denison EA Meeting - Follow-up
Sent: 2022-03-10 1:43:12 PM

FYI – might be something more recent but will let you know.

Ryan

From: Garrett Schmidt <garrett.schmidt@yathinene.com>
Sent: July 7, 2021 5:09 PM
To: Froess, Ryan <ryan.froess@cnsccsn.gc.ca>
Subject: RE: YNLRO/CNSC - NexGen/Denison EA Meeting - Follow-up

Hello Ryan,

I agree we should set up some next meetings. YNLR is likely going to want to meet with the CNSC about the Orano TMF before we submit our intervention on Aug 23rd (we just got a 1 week extension due to COVID in Hatchet).

Also, I would like to discuss a process for developing a Terms of Reference including accessing funding to support the overall process as I envision some advisor support, staff time and of course communication with the YNLR Board and Basin leadership.

We have our call scheduled for next Friday, would you be able to bump it up to the morning of the 15th at 10am? Perhaps we can talk a bit more about the Orano TMF and next steps for the TOR at that meeting.

Thanks.

Garrett

From: Froess, Ryan <ryan.froess@cnsccsn.gc.ca>
Sent: June 30, 2021 10:21 AM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: RE: YNLRO/CNSC - NexGen/Denison EA Meeting - Follow-up

Hi Garrett,

I hope things are well. I am off later afternoon and back on Monday but I just following up on our meeting last week on setting some future meetings to continue our discussions on the two EA files. I know summer is a busy time for many including the YNLRO communities and leadership but

I think it would be valuable to set-up a monthly meeting in July and August to continue our discussion and path forward on communication and participation on these two files.

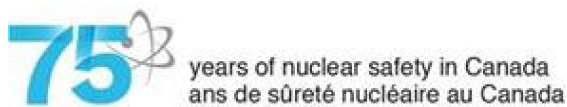
I am away the week of July 17-25 and August 7-15 this summer but otherwise generally available. I know my colleagues Adam, Marcelle, and Nicole also have some time booked off.

July may be difficult to have everyone in attendance but August (the last two weeks) looks pretty wide open for all of us.

Let me know what might work best for YNLRO and we can go from there and set something up.

Thanks,

Ryan Froess
Senior Policy Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892



From: Garrett Schmidt <garrett.schmidt@yathinene.com>
Sent: June 24, 2021 4:24 PM
To: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Cc: b.hunter@watertight.ca; Shea Shirley <shea.shirley@yathinene.com>; Phaneuf, Marcelle <marcelle.phaneuf@cnscccsn.gc.ca>; Frigault, Nicole <Nicole.Frigault@cnscccsn.gc.ca>; Levine, Adam <Adam.Levine@cnscccsn.gc.ca>; Roy-Drainville, Cassandre <cassandre.roy-drainville@cnscccsn.gc.ca>
Subject: RE: YNLRO/CNSC - NexGen/Denison EA Meeting - Follow-up

Hello Ryan,

It was good meeting this morning. We look forward to further reviewing some of the materials and discussing some of the opportunities available for enhanced communication and participation from the Basin communities.

Talk to you next week.

Garrett

From: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Sent: June 24, 2021 2:48 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>

Cc: b.hunter@watertight.ca; Shea Shirley <shea.shirley@yathinene.com>; Phaneuf, Marcelle <marcelle.phaneuf@cnscccsn.gc.ca>; Frigault, Nicole <Nicole.Frigault@cnscccsn.gc.ca>; Levine, Adam <Adam.Levine@cnscccsn.gc.ca>; Roy-Drainville, Cassandre <cassandre.roy-drainville@cnscccsn.gc.ca>

Subject: YNLRO/CNSC - NexGen/Denison EA Meeting - Follow-up

Hi Garrett,

Thanks for taking the time and the great meeting today with the CNSC on the two CEAA 2012 EA projects taking place in Northern Saskatchewan. We understand there was a lot to take in today so we will let you have some time to digest all of that information and discuss internally and perhaps we can schedule a meeting sometime in July to discuss a few of the topics in more detail that are of interest to YNLRO for the EA projects.

I have attached some materials we briefly mentioned in our meeting this morning. One is guidance the CNSC has provided to the proponents on Indigenous engagement expectations for CEAA 2012 and the second is some additional information on participation in the FPRT and the EA Reporting. Although we did not have time to go into much detail on these topics at our meetings today, there will be an opportunity to go into more details and ask questions in future meetings.

Also regarding Bill's questions and our discussion that took place on potential cumulative effects and how those are assessed under CEAA 2012 I have attached a few links below.

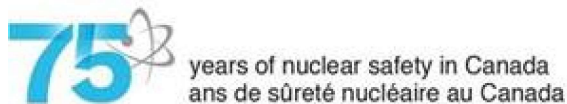
<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-under-canadian-environmental-assessment-act-2012.html>

<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-ceaa2012.html>

I will be in touch next week to find a time that works best for the YNLRO/CNSC staff to continue these discussions on this two EA projects for the summer months (July/August) and then we can go from there for future meetings into the fall.

Thanks again,

Ryan Froess
Senior Policy Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892



From: [Froess, Ryan](#)
Cc: [Adam Zenobi \(adam.zenobi@cnsccsn.gc.ca\)](#)
[kevin.mercredi@outlook.com](#); [Chief Coreen Sayazie; b-tsannie@hotmail.com](#); [Shea Shirley](#); [Garrett Schmidt](#); [Cheyenna Campbell \(cheyenna.campbell@desnedhe.com\)](#); [jerry.bernard@erfn.net](#); [Mark Calette](#); [slandriecrossland@mns.work](#); [s.nickolet@mns.work](#); [Walter Smith](#); [Billie Jo Natomagan](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [tcooksearson@llrib.ca](#); [gchristiansen@llrib.ca](#); [lburnouf@mns.work](#); [tex.mns@sasktel.net](#); [Eric Sylvestre](#); [chief1@birchnarrows.ca](#); [norma.catarat@outlook.com](#); [Elmercampbell35@gmail.com](#); [glenmccallum](#);
Bcc:
Subject: CNSC Participant Funding Notice - Denison Mines Draft EIS
Sent: 2022-01-10 3:33:00 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Good afternoon,

Funding is available to assist Indigenous peoples, members of the public and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Denison is proposing to develop an in situ recovery uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit a completed participant funding application is March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/pfp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

For questions about this specific funding opportunity, please contact:

Mr. Adam Zenobi
Participant Funding Program Administrator
613-415-2814
pfp@cnsccsn.gc.ca

Thanks,

Ryan Froess

Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892

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To unsubscribe, send an email to cnsc.info.ccsn@cnscccsn.gc.ca

From: [Froess, Ryan](#)
To: [Way, Jessica](#)
Subject: FW: CNSC Participant Funding Notice - Denison Mines Draft EIS
Sent: 2022-03-10 5:07:12 PM

FYI sent to these Nations and communities.

kevin.mercredi@outlook.com; Chief Coreen Sayazie <csayazie@hotmail.com>; b-tsannie@hotmail.com; Shea Shirley <shea.shirley@yathinene.com>; Garrett Schmidt <garrett.schmidt@yathinene.com>; Cheyenna Campbell (cheyenna.campbell@desnedhe.com); jerry.bernard@erfn.net; Mark Calette <mcalette@mns.work>; slandriecrossland@mns.work; s.nickolet@mns.work; Walter Smith <wsmith@kineepik.ca>; Billie Jo Natomagan <bnatomagan@kineepik.ca>; jtsanniejr@pagc.net; rmcleod@pagc.net; tcooksearson@llrib.ca; gchristiansen@llrib.ca; lburnouf@mns.work; tex.mns@sasktel.net; Eric Sylvestre <eric.sylvestre@birchnarrows.ca>; chief1@birchnarrows.ca; norma.catarat@outlook.com; Elmercampbell35@gmail.com; glenmccallum glenmccallum@mns.work

From: Froess, Ryan
Sent: March 9, 2022 4:12 PM
Cc: Adam Zenobi (adam.zenobi@cnsccsn.gc.ca) <adam.zenobi@cnsccsn.gc.ca>
Subject: RE: CNSC Participant Funding Notice - Denison Mines Draft EIS

Good afternoon,

This is a reminder that funding is available to assist Indigenous Nations and communities, members of the public, and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

The deadline to submit this funding application is due March 14, 2022.

For more information on the project and how to participate, go to <https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/pfp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

If you have any questions on the application **please do not hesitate to reach out** to myself by phone or email and or for specific questions please feel free to contact:

Adam Zenobi
Participant Funding Program Administrator

613-415-2814
pfp@cnsccsn.gc.ca

Thanks you,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnsccsn.gc.ca | Cell: 306-914-7892

From: Froess, Ryan
Sent: January 10, 2022 2:33 PM
Cc: Adam Zenobi (adam.zenobi@cnsccsn.gc.ca) <adam.zenobi@cnsccsn.gc.ca>
Subject: CNSC Participant Funding Notice - Denison Mines Draft EIS

Good afternoon,

Funding is available to assist Indigenous peoples, members of the public and stakeholders in the review of the draft environmental impact statement (EIS) for the Wheeler River project proposed by Denison Mines Corp. Denison is proposing to develop an in situ recovery uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. Before the Commission can make a licensing decision, an Environmental Assessment (EA) is required under the Canadian Environmental Assessment Act, 2012, along with an EA decision affirming that the proposed activities will not cause significant adverse environmental effects. Please note that this first phase of funding is intended to assist in the review of the draft EIS.

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<https://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/pfp-review-draft-environmental-impact-statement-denison-mines-corp-wheeler-river-project.cfm>.

For questions about this specific funding opportunity, please contact:

Mr. Adam Zenobi
Participant Funding Program Administrator
613-415-2814
pfp@cnsccsn.gc.ca

Thanks,

Ryan Froess
Senior Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission

ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892

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Follow the CNSC on LinkedIn: <https://www.linkedin.com/company/cnscccsn/life>

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To unsubscribe, send an email to cnscccsn.info@cnscccsn.gc.ca

From: [Way, Jessica](#)
To: [Garrett Schmidt](#)
[Yen, Wish](#); Mossop, Veronica; [Froess, Ryan](#); [Shea Shirley](#); [claire_larock@hotmail.com](#); [d.powder.nhsr@sasktel.net](#);
Cc: [csayazie@hotmail.com](#); [b-tsannie@hotmail.com](#); [kevin.mercredi@outlook.com](#); [Bruce Hanbidge](#);
Bcc: [Way, Jessica](#)
Subject: RE: Wheeler River Environmental Assessment - YNLRO/CNSC Meetings
Sent: 2022-03-11 10:41:00 AM

Hi Garrett,

Thanks for the prompt reply. It looks like April 7th will work for CNSC staff.

In terms of Agenda, I would propose:

- Introductions
- Updates on the EA Status and timelines (CNSC)
- Update on work between Denison and YNLRO (YNLRO)
- Opportunities for collaboration and consultation (CNSC / YNLRO)
- Decide on re-occurring meeting time (CNSC / YNLRO)

Does this work for you?

I will send out an invite shortly, and we can tweak the agenda as needed. Have a great weekend!

Thanks,
Jes

From: Garrett Schmidt <garrett.schmidt@yathinene.com>
Sent: Friday, March 11, 2022 10:34 AM
To: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Cc: Yen, Wish <wish.yen@cnsccsn.gc.ca>; Mossop, Veronica <veronica.mossop@cnsccsn.gc.ca>; Froess, Ryan <ryan.froess@cnsccsn.gc.ca>; Shea Shirley <shea.shirley@yathinene.com>; [claire_larock@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [csayazie@hotmail.com](#); [b-tsannie@hotmail.com](#); [kevin.mercredi@outlook.com](#); [Bruce Hanbidge](#) <bruce.hanbidge@yathinene.com>
Subject: RE: Wheeler River Environmental Assessment - YNLRO/CNSC Meetings

Good morning Jess,

Thanks for the email. Yes, let's connect in early April. I am available on the 6th or 7th. Bruce Hanbidge (YNLR Ops Manager, cc'd) will also join the call.

What agenda do you propose for the meeting?

Regards,

Garrett

From: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Sent: March 11, 2022 9:26 AM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Cc: Yen, Wish <wish.yen@cnsccsn.gc.ca>; Mossop, Veronica <veronica.mossop@cnsccsn.gc.ca>; Froess, Ryan <ryan.froess@cnsccsn.gc.ca>; Shea Shirley <shea.shirley@yathinene.com>; claire_larock@hotmail.com; d.classen@sasktel.net; d.powder.nhsr@sasktel.net; csayazie@hotmail.com; b-tsannie@hotmail.com; kevin.mercredi@outlook.com
Subject: Wheeler River Environmental Assessment - YNLRO/CNSC Meetings

This email was sent from outside the organization, please exercise caution and verify that it's from the proper sender. For questionable emails that you receive, please forward to BHTech to verify and NEVER click on links

Hi Garrett,

I am reaching out to introduce myself, as I have taken over from Marcelle Phaneuf as the CNSC's Environmental Assessment (EA) lead for Denison's proposed Wheeler River Project.

I understand that Marcelle, Ryan and the CNSC's NextGen EA team have been working with yourself and Shea over the last couple of years, in order to discuss next steps of the EA consultation processes with Ya'thi Néné. I suspect that things are likely busy for you and your team at the moment, given the upcoming Beaverlodge hearing, but I was hoping to start getting meetings in the calendar in order to talk about next steps of the EA process for Wheeler River.

Do you think we could set something up to talk end of March or early April, once the Beaverlodge hearing is over? Please let me know if are some timeslots that would work for you, and if there is anyone else that I should be including on these emails. Note that I have included Wish Yen and Veronica Mossop in CC here, as they are part of the CNSC's Wheeler River EA team.

Looking forward to meeting and working with you.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada

Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: garrett.schmidt@yathinene.com; bruce.hanbidge@yathinene.com;
Cc: [Yen, Wish](#); [Froess, Ryan](#);
Subject: RE: Ya'Thi Néné-CNSC Meeting Minutes for April 7th, 2022
Sent: 2022-04-22 3:43:09 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Garrett,

Reaching out to follow up on the email below, and scheduling another meeting to talk about the Dension EA and next steps. Is there a reoccurring day/time that would work for you, and is there anything below that might work for a meeting in May?

Have a great weekend!
Jes

From: Way, Jessica
Sent: Thursday, April 14, 2022 6:12 PM
To: garrett.schmidt@yathinene.com; bruce.hanbidge@yathinene.com
Cc: Yen, Wish <wish.yen@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: Ya'Thi Néné-CNSC Meeting Minutes for April 7th, 2022

Hi Garrett and Bruce,

Thank you again for your time last week. Below are the minutes from our meeting (thanks to Wish for the detailed notes!).

Regarding the actions, attached is the brief presentation that we shared with you. We also discussed setting up a meeting time for May. Ideally, it would be nice to get something in the calendar that is reoccurring, so if there is a monthly day/time that works well for the two of you over the coming months, please let me know. Here are some potential days/times to meet in May:

Thursday May 12 – after 10 am SK time
Tuesday May 17 – after 11am SK time
Thursday May 19th – after 10 am SK time

Would any of these work for you both? If not, please advise what would work best for you and we will try and make it work.

Looking forward to working with you!

Sincerely,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

Ya'Thi Néné Lands and Resource Office (YNRLO)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

- Attendees: YNRLO - Garrett Schmidt, Bruce Hanbidge CNSC - Ryan Froess, Jessica Way, Wish Yen
Date/time: April 7th, 2022 1:00 pm – 2:30 pm CST

- **PFP Funding**

- Adam Z. (PFP Coordinator) is currently reviewing the application and will reach out as needed with any questions
- Most likely early-mid May – The federal review committee anticipates a decision

CEAA 2012 Process and Project Updates – Presentation (Edoc # 6776456)

- The Wheeler River Project has been described as a closed loop mining process by Denison. The [summarized project description](#) submitted by Denison in 2019 indicates the process for uranium mining in the wellfields will be a “closed loop system with potentially no need for treated effluent discharge to the environment” (pg. 7).
 - To date, CNSC understands the project to be a closed loop system with limited (if any) water treatment and discharge.
 - CNSC recommends reaching out to Denison to confirm the technical details related to the proposed mining process.

EA Process – The scope of the Environmental Assessment is limited to significant environmental effects on the proposed project.

Licensing Process – The licensing process has a more substantial scope which would encompass technical assessments, emergency planning, radiation protection, etc.

- The licensing and EA process can be a concurrent process, but Denison has only begun the EA process and plans to begin the licensing process at a later date. As a result, CNSC’s review of the proposed project is currently limited to significant environmental impacts or effects of the Wheeler River Project.
- For the NexGen Project in comparison, the licensing and EA processes are both underway.

Wheeler River EA Project Activities

- The federal EA is a CNSC led process (as Responsible Authority) with a province EA taking place concurrently:

- Denison will submit the draft EIS to both the Province of Saskatchewan and CNSC, but the assessments will be conducted separately. The CNSC and Province meet regularly with each other and proponent to ensure the federal and province EA aspects are addressed and to avoid duplication.
 - Technical concerns are brought forth by the Province and federal parties (led by CNSC), which includes assessment by the Federal Indigenous Review Team (FIRT).
- Duty to consult – Question from Garrett. How does the province complete its consultation for the project?
 - The Province of Saskatchewan often, but not always, delegates the Duty to Consult to the Proponent but from our understanding does plan to get out and consult with the Nations/communities to verify proponents consultation activities to date once the Draft EIS is submitted.
 - YTLRO was curious as YNRLO has heard very little from the province on the Wheeler River Project.
 - CNSC does not delegate Duty to Consult. The CNSC represents the federal crown and is the lead on the Federal EA and works with many different dept on the review and report as well as the province. CNSC will be completing the DtC for the Federal EA.
 - YTLRO mentioned it has a preference for in-person engagement. CNSC staff noted this and hopes to visit the YNRLO Saskatoon office and visit the Nations and communities in 2022.
- Impact Assessment Act 2019 – question(s) on why Wheeler River Project not going through IAA (2019):
 - The Wheeler River Project is designated as a CEAA 2012 project as it was submitted before the new Impact Assessment Act 2019 act came into force.
 - The CNSC will be the federal lead for the EA but the province will also be completing its own EA process concurrently.
 - The Denison Wheeler River Project would not be designated or have triggered an Impact Assessment under the new IAA 2019 (if submitted currently) and the Environmental Assessment of the project will remain under the CEAA 2012, [as per transitional provisions of the new Act](#).
- CEAA 2012 EA Process:
 - YTLRO has highlighted that Indigenous impacts are usually long-term, cumulative and socio-economic.
 - YTLRO would like more information on how CNSC will be completing a socio-economic analysis:
 - CNSC welcomes any additional discussions regarding the scope of this analysis but the project will follow the CEAA 2012 EA process and Act.
 - The CNSC has developed several opportunities that meet and exceed best practices in EAs (presented) including PFP to support capacity for Nations to review sections of the EA, participate as a member of the Federal Indigenous Review Team for the EIS technical review and in Rights Impact Assessment, among others.
 - CNSC can share a guidance on how the Right Impact Assessment process/methodology is completed for EA report and opportunities for the YNRLO to be involved if interested.

- YYLRO has a preference for approved socio-economic methodology used in the US - methodology used by the government of Canada to be discussed in a future meeting.
 - YTLRO is concerned with rights to fish, hunt and trap and wants to ensure the rights are reflected throughout the EIS:
 - Focus will be on how the in-situ recovery technology and mine will impact rights of the Nations in the area.
 - Denison should have an understanding of current use of the Nations and communities apply the information and knowledge appropriately.
- Draft EIS - Conformity Review:
 - The conformity review or check is to be completed within 30 days of receiving the EIS, by the CNSC (does not involve the FIRT).
 - Bruce indicated that past experiences have led to long iterative review processes which take up capacity when conformity reviews are not completed effectively.
 - CNSC has noted this concern and explained that this review is essentially a checklist, to ensure the EIS conforms to the EIS guidelines (for instance, contains all of the relevant sections and addresses all EIS topics, not whether the content adequate). Alternatively, the EIS technical review assesses whether the technical assessment is adequate and comprehensive, and whether there is adequate information to make an EA conclusion, which is where FIRT expertise is invited. Should the technical review identify deficiencies in content, information requests will be sent back to Denison in order to resolve these questions and concerns.
 - Should the EIS pass conformity, the project would move forward to the FIRT technical review and Public Comment Periods, which take place concurrently.
- What is the Federal Indigenous Review Team (FIRT) (90-day period):
 - The FIRT is composed of subject matter experts (Health Canada, Natural Resources Canada, Fisheries and Oceans, Transport Canada, Environment and Climate Change Canada, etc.) who have approximately 8-weeks to complete a review of relevant sections of the EIS, which are scoped to content relevant to the participants departmental mandate and subject matter expertise.
 - Should the Ya'Thi Néné wish to participate, the scope would be limited to traditional knowledge, land use and impacts to the community as a result of the project, including a reflection of other information provided to Denison by YTLRO, including concerns about the proposed project.
 - The CNSC can provide additional information and guidance/presentation on the FIRT if the YNRLO is interested in participating.
- Draft EIS - Public Comment Period:
 - Takes place concurrently with the FIRT technical review.
 - This review is open to the public and Indigenous Nations and communities and is more broad in scope, in terms of comments on the Draft EIS.

Other potential Funding

- PFP for the Draft EIS review will be determined in May by a Independent funding committee.
- Project Specific Terms of Reference can be drafted if there is interest in YNRLO collaborating with CNSC.

- Different funding compared to broad ToR for long term work with CNSC.

Update on YTLRO engagement with Denison

- Ongoing project relationship building and engagement support with Denison
- Wheeler River review initiative with communications on the Athabasca Region
 - YTLRO has provided a review of the field test project to Denison
- Forms of agreement for the Wheeler River project and other Denison initiatives
- Engagement with Denison are going well and continue to progress in that direction

Action Item and Next Steps

- CNSC to attach slide deck for the EA process and opportunities to collaborate with the CNSC - attached
- Set-up next meeting in May and monthly thereafter if YNRLO is interested.
- Future discussions regarding the Rights Impact Assessment/FIRT, EA methodologies and other EA engagement activities in the communities.

From: [Way, Jessica](#)
To: [Garrett Schmidt](#); [Bruce Hanbidge](#);
Cc: [Froess, Ryan](#); [Yen, Wish](#); [DeCoste, Laura](#); [Way, Jessica](#);
Subject: YNLRO-CNSC Meeting Minutes from June 14, 2022
Sent: 2022-06-21 5:32:01 PM

Hi Garrett,

Please see below for the meeting minutes from last week's meeting.

Related to our discussion on the ROR, attached is the notice of meeting and PFP offering.

If you have any questions or concerns about these, please let me know.

Thanks,
Jes

Ya'Thi Néné Lands and Resource Office (YNLRO)-CNSC Meeting Minutes – Denison Mines Wheeler River Project

June 14th, 2022 1:30-2:30PM EST

Attendees: Garrett Schmidt, Bruce Hanbidge, Jes Way, Ryan Froess, Wish Yen

Terms of Reference

- Terms of reference has been signed by YNLRO, CNSC will send back the signed copy
 - CNSC proposes a newsletter to announce signing the Terms of Reference
- Scopes of work and project activities will be established in a workplan
 - Funding will be determined through the workplan
- Quarterly meetings to include all CNSC related projects, with monthly meetings for ongoing projects and sub-groups from the committee to focus on different projects, as needed

Denison Wheeler River Project

- PFP submission has been approved
- YNLRO participation in the EA process will be clarified in the workplan
- Denison draft-EIS review by the YNLRO will consider feedback from the YNLRO working group, community and leadership feedback
- YNLRO anticipates that Hatchet Lake will participate in engagement through TK or site visits

EA Update

- Draft EIS submission is anticipated for September
- Field test (60-day test)
 - CNSC will provide an information letter on the project shortly
 - Field test is considered an exploratory activity and is not part of the EA process – usually this would be a provincially regulated activity, however CNSC has deemed that a Nuclear Substance licence is required
 - Licencing review is currently underway and could be issued (if approved) as early as July
 - CNSC will provide the YNLRO an update once available
 - Province of SK has been engaging with YNLRO on the field test

- In-person engagement on the draft EIS, technical review and public comment period planned for the fall
- Timelines for the project to be shared once available
- Denison and YNRLO has an engagement agreement in place since Fall 2021
- YNRLO is concerned that the plate cap could leak into the water table and has requested background information for that environment from Denison
 - Denison has indicated they will provide the report for CNSC and the Province of SK to review
 - CNSC will flag this for our experts to review

Annual Regulatory Oversight Report

- July 15th: PFP due date for the ROR for Uranium Mines and Mills in Canada: 2021 (Notice attached)
- ROR information session may be hosted locally and is anticipated for September
- Scope includes operating sites, including Key Lake Mill, McArthur River Mine, Cigar Lake Mine, Rabbit Lake Mine and Mill and McClean Lake Mill
 - Decommissioned sites will be reviewed again in 2024 as part of the 3-year review cycle

Action Items

- CNSC will send the signed ToR back to the Ya'Thi Néné (**Ryan**)
- CNSC to provide updates on the timelines for next steps ASAP (**Jes**)
- Once YNLRO-CNSC workplan is developed, team to reconvene discussions specific to the Wheeler Project (pending confirmation from **Ryan and Garrett**)

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
 Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213



June 17, 2022

e-Doc: 6813255

Garrett Schmidt
Ya'Thi Néné Lands and Resource Office
Garrett.schmidt@yathinene.com

Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Dear Garrett Schmidt:

This letter is to inform you that Denison Mines Corp. (Denison) has submitted an application to the Canadian Nuclear Safety Commission (CNSC) for a Nuclear Substances and Radiation Devices licence, for the Wheeler River Exploration Project in northern Saskatchewan. This licence application is for the temporary storage and use of natural uranium in laboratory studies, for a 60 day feasibility field test that Denison are planning to conduct in August 2022. Following completion of the test, the recovered material will be temporarily stored above ground.

Proposed Wheeler River Project

The Wheeler River Property is located in the eastern part of the Athabasca Basin, approximately 4 km west of Highway 914 and 35 km north of the Key Lake mill. Denison has proposed a project to construct, operate, and decommission an in-situ uranium mine. An [Environmental Assessment \(EA\) under the Canadian Environmental Assessment Act of 2012](#) (CEAA 2012) has been underway since 2019 for the proposed Wheeler River Project, led by CNSC staff. Concurrently, the Government of Saskatchewan is also leading a [provincial EA](#).

Field work at the site has been occurring since 2007, with advanced drilling and testing occurring since 2019. These activities have had continual oversight from the Saskatchewan Ministry of Environment, and the CNSC as necessary.

It is important to note that the proposed feasibility field test is not within the scope of the CEAA 2012 EA, as this is a distinct project. The field test could therefore proceed prior to an EA decision.

Feasibility Field Test

Through the feasibility field test, Denison intends to validate previous testing and determine the feasibility of the proposed in-situ recovery mining methodology at the Wheeler River Property. This test requires no new clearing of land or new drilling, only the construction of limited temporary surface facilities.

During the planned test, mineralized material will be removed from the ground through a process that includes injecting a solution into test wells, separating liquids from solids, and collecting the resulting materials for further analysis. These materials are expected to contain elevated levels

natural uranium, and samples will be analysed for general chemistry at the on-site chemical laboratory and later transported to the Saskatchewan Research Council in Saskatoon for further analysis. Once all analysis is complete, materials will be placed in above ground storage tanks, and will remain the property of the Crown, under the oversight of the Saskatchewan Ministry of Environment (SMOE).

In March 2022 an application was also submitted to the SMOE, as Denison requires a permit to construct and operate a pollutant control facility prior to conducting the proposed feasibility field test. This permit is required under Saskatchewan's *Mineral Industry Environmental Protection Regulations, 1996*, and the application remains under provincial review.

Licensing Process

Unlike Class I nuclear facilities and uranium mines and mills, licences for use of Nuclear Substances and Radiation Devices are issued by a Designated Officer (DO) of the CNSC. A DO is a member of CNSC staff who has been designated specific powers under the *Nuclear Safety and Control Act* with respect to licensing and compliance. Like the Commission, DOs demonstrate independence and procedural fairness. With their extensive knowledge, regulatory training and operational experience, DOs are well qualified to make decisions on behalf of the Commission. DO decisions are based on rigorous reviews performed by CNSC staff, who verify that the applicant would meet regulatory requirements. After completing their evaluations, CNSC staff prepare DO documents – which include technical and regulatory information, conclusions and recommendations – to help inform DO licensing decisions.

Nuclear Substances and Radiation Devices licences have a service standard of 80 business days for a DO decision, from the date a complete application has been received. DOs will only grant the licence if they are satisfied that the authorized activities do not pose a risk to health, safety, security and the environment.

As an Indigenous Nation and/or community with a potential interest in Denison's licence application, the CNSC is interested in hearing any views or receiving any additional information you may have with respect to Denison's application to the CNSC for a Nuclear Substances and Radiation Devices Licence, for this proposed project.

Further Information

CNSC staff will continue to keep you apprised of the status of this licence application, DO decision and next steps, including more information on the CNSC's licensing requirements and oversight activities should a licence be granted to Denison for the proposed field test.

If you would like to meet to discuss in further detail, and have any questions relating to this licence application or the ongoing EA for the Wheeler River Project, please contact:

- Jes Way, Environmental Assessment Officer, Wheeler River EA Lead
Email: jessica.way@cnsccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous and Stakeholder Relations Division
Email: ryan.froess@cnsccsn.gc.ca

If you wish to receive e-mail notifications related to the EA process and other updates on this licensing process, please let us know and we can add you to the project distribution list.

You may also sign-up to the CNSC mailing list to receive notifications CNSC website is updated, including notices for hearings, meetings and Participant Funding Program opportunities. Visit the following link and choose the 'new subscriber' option:

<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

Sincerely,



Nana Kwamena

Director, Environmental Assessment Division

Canadian Nuclear Safety Commission

E-mail: nana-owusua.kwamena@cnsccsn.gc.ca

c.c.: B. Tsannie, C. Sayazie, K. Mercredi
S. Faille, N. Babcock, P. Burton, S. Akhter, J. Way, W. Yen, A. Levine, R.
Froess, CNSC
A. Sadik, B. England, SEASB

A similar letter was also sent to the following:

- Black Lake Denesuline First Nation
- Fond-du-Lac Denesuline First Nation
- Hatchet Lake Denesuline First Nation

From: [Way, Jessica](#)
To: [Garrett Schmidt](#)
Cc: [Kwamena, Nana-Owusua](#); [Faille, Sylvain](#); [Babcock, Neil](#); [Burton, Patrick](#); ['Salman Akhter \(salman.akhter@cnscccsn.gc.ca\)'](#); [Yen, Wish](#); [Levine, Adam](#); [Froess, Ryan](#); ['Aimann Sadik'](#); [England, Brianne ENV](#); [csayazie@hotmail.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [Way, Jessica](#);
Subject: Notice of Nuclear Substances and Radiation Devices Licence issued to Denison Mines Corp.
Sent: 2022-08-05 11:25:00 AM

Hi Garrett,

In follow up to our email and letter from June 17th, this email is to inform you that a Nuclear Substances and Radiation Devices licence has now been granted to Denison Mines Corp. (Denison) by a CNSC Designated Officer.

Denison applied for a Nuclear Substances and Radiation licence for the Wheeler River Exploration Project in northern Saskatchewan in order to complete a feasibility field test of the proposed in-situ recovery mining methodology at the Wheeler River Property. This licence, which is valid from August 3, 2022 to December 31, 2023, authorizes Denison to temporarily store and use natural uranium in laboratory studies above ground.

As always, we remain available to discuss in more detail. To obtain more detailed information or for any questions, please contact Jes Way at jessica.way@cnscccsn.gc.ca or Ryan Froess at ryan.froess@cnscccsn.gc.ca.

Sincerely,
Jes

From: Way, Jessica
Sent: Friday, June 17, 2022 3:57 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Cc: Kwamena, Nana-Owusua <nana-owusua.kwamena@cnscccsn.gc.ca>; Faille, Sylvain <sylvain.faille@cnscccsn.gc.ca>; Babcock, Neil <neil.babcock@cnscccsn.gc.ca>; Burton, Patrick <patrick.burton@cnscccsn.gc.ca>; Salman Akhter (salman.akhter@cnscccsn.gc.ca) <salman.akhter@cnscccsn.gc.ca>; Jes W <jeslway@gmail.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Levine, Adam <adam.levine@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Aimann Sadik <aimann.sadik@gov.sk.ca>; England, Brianne ENV <brianne.england@gov.sk.ca>; csayazie@hotmail.com; kevin.mercredi@outlook.com; b-tsannie@hotmail.com
Subject: Denison Wheeler River Project - 2022 Feasibility Field Test - Nuclear Substances and Radiation Devices Licence Application

Hi Garrett,

Attached is the letter promised earlier in the week, regarding the application from Denison Mines Corp. for a Nuclear Substance and Radiation Device licence.

Similar letters will also be sent to the attention of the Chiefs of Black Lake, Fond-du-Lac and Hatchet Lake First Nations.

If you have any questions or would like to discuss further, please let us know.

Sincerely,
Jes Way

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)
[Brent Laroque](#); [Shannon Landrie-Crossland](#); [Way, Jessica](#);
[cheyenna.campbell@desnedhe.com](#); [jerry.bernard@erfn.net](#);
[nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bnatomagan@kineepik.ca](#);
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[garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#);
[kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#);

Bcc: [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#);
[chief1@birchnarrows.ca](#); [Froess, Ryan](#); [DeCoste, Laura](#); [Yen, Wish](#); [Way, Jessica](#);
[norma.catarat@brdn.ca](#); [receptionist@mltc.net](#);
[claire_larock@hotmail.com](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#);
[bmerasty@pbcn.ca](#); [tcooksearson@llrib.ca](#); [jtsanniejr@pagc.net](#);
[gchristiansen@llrib.ca](#); [Bruce Hanbidge](#); [Lo, Tiffany](#); [Janna Switzer](#);
[Carolanne Inglis-McQuay](#); [Aimann Sadik \(aimann.sadik@gov.sk.ca\)](#); [Frigault, Nicole](#);

Subject: Upcoming Webinar - Rook I and Wheeler River Projects

Sent: 2022-08-24 4:42:00 PM

Good afternoon,

On September 13th from 10am to 11am CST (noon to 1pm EST), CNSC will be hosting a webinar on the CNSC regulatory review process for NexGen Energy Ltd's proposed Rook I project and Denison Mine's proposed Wheeler River project.

The webinar will cover:

- CNSC's regulatory review process for licensing and environmental assessments
- an update on the status of the Rook I and Wheeler River projects

There will be an opportunity for questions, and if you are unable to attend the webinar will also be recorded.

To register, please visit: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/meet-the-nuclear-regulator/webinar-NexGen-Rook-I-and-Denison-Wheeler-River-Projects.cfm>. More information can also be found at: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/meet-the-nuclear-regulator/index.cfm>.

Feel free to share with your distribution groups or anyone else that might be interested. If you have any questions, please don't hesitate to contact us.

Sincerely,

Jes Way

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213



Ya'thi Néné Lands and Resources/Canadian Nuclear Safety Commission

YNLR-CNSC Working Group Kick-Off Meeting

September 26, 2022, 1:00-5:00pm

101-22nd Street East, Suite 520, Saskatoon, SK S7K 0E1

Join on your computer or mobile app

[Click here to join the meeting](#)

Meeting ID: 282 103 718 127

Passcode: ZwbYU6

Or call in (audio only)

[+1 647-749-9265,,110737827#](#) Canada, Toronto

[\(844\) 632-5179,,110737827#](#) Canada (Toll-free)

Phone Conference ID: 110 737 827#

Attendees:

Mary Denechezhe - ALPC Member (Hatchet Lake)
Archie Disain - ALPC Member (Black Lake)
Chris Toutsaint - ALPC Member (Fond du Lac)
Louise Bougie-Still - ALPC Member (PRO – Uranium City)
George St Pierre - ALPC Member (Hatchet Lake)
Freddie Throassie - ALPC Member (Black Lake)
Al Sayn - ALPC Member (PRO – Stony Rapids)
Mervin Adam - ALPC Member (Fond du Lac)
Garrett Schmidt - YNLR Executive Director (Co-Chair)
Kristen MacDonald - YNLR Admin/Communications
Ryan Froess – CNSC Senior Advisor (Co-Chair)
Adam Levine – CNSC Team Leader – Indigenous Relations
Sydney Nickolet – CNSC Policy Officer – Indigenous Relations

Agenda:

- Opening Prayer
- Review and adopt Agenda
- Introductions
- Review Terms of Reference
- Review CNSC Mandate and Background – CNSC Presentation
- Review Draft Workplan
- Break – 3:00 pm

- Presentation from CNSC on Environmental Assessment Process
- Other Business
- Next meeting date and location
- Closing Prayer & Meeting Adjournment

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#); [Cheyenna Hunt](#); jerry.bernard@erfn.net; nvp.mike@sasktel.net; wsmith@kineepik.ca; bnatomagan@kineepik.ca; glenmccallum@mns.work; [Brent Laroque](#); [Shannon Landrie-Crossland](#); garrett.schmidt@yathinene.com; shea.shirley@yathinene.com; kevin.mercredi@outlook.com; b-tsannie@hotmail.com; csayazie@hotmail.com; d.powder.nhsr@sasktel.net; d.classen@sasktel.net; chief1@birchnarrows.ca; norma.catarat@brdn.ca; receptionist@mltc.net; claire_larock@hotmail.com; karenbird@pbcn.ca; tmerasty@pbcn.ca; bmerasty@pbcn.ca; tcooksearson@llrib.ca; jtsanniejr@pagc.net; gchristiansen@llrib.ca; cheyenna.hunt@desnedhe.com; karenbird@pbcn.ca;

Bcc:

Subject: Wheeler River Project EIS Received - Conformity Review Underway

Sent: 2022-10-24 11:28:00 AM

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: garrett.schmidt@yathinene.com
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#); [Bruce Hanbidge](#);
Subject: YNLRO-CNSC Meeting & Wheeler River Draft EIS
Sent: 2022-10-24 4:26:02 PM

Hi Garrett,

It was great to get to meet with and present to Ya' Thi Néné in person last month. As you are probably aware from the email I sent out earlier today, CNSC staff have received the Environmental Impact Statement for the Wheeler River project. We are currently conducting our 30-day review to determine whether it conforms with the CNSC's Generic EIS Guidelines.

I am reaching out because we are hoping it would be possible to meet in the coming month or so, to talk about next steps of the consultation process. Ultimately, we'd also like to schedule a reoccurring meeting - at whatever frequency your team would be comfortable with. I realize there are meetings that will take place under the Terms of Reference, but I am specifically referring to meetings on the proposed Wheeler River Project. I am not sure if the board that we met with during the Terms of Reference kick off would also be the team we worked with for consultation on this project, so please let me know who would need to be invited to any project specific meetings.

If there are particular weeks that might work for you over the next 4-6 weeks, let me know which and I can propose some time slots. Alternatively, if you'd prefer to provide some dates and times that work for you, let us know and I can see if one will work for CNSC project team. If this would be easier over the phone, please don't hesitate to give me a call.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Froess, Ryan](#); [Garrett Schmidt](#);
Cc: [Yen, Wish](#); [Nickolet, Sydney](#); [Bruce Hanbidge](#);
Subject: RE: EXTERNAL: YNLRO-CNSC Meeting & Wheeler River Draft EIS
Sent: 2022-11-01 11:22:00 PM

Hi Garrett,

If the conformity review that we are currently conducting were to pass, the public comment period would open on November 21st and then close around approximately February 19th. If it were to fail, it would start later - this would depend on when Denison were to resubmit.

For the meeting, the only challenge with Dec 15th and 16th is the fact that the ROR meetings are on these days and Ryan may not be available. I am definitely thinking virtual, although I am hoping it might be possible to meet in person again in the new year, once we have the comments from the 90 day comment period (early march). It sounds like Ryan can update me after you chat on Thursday and we can go from there.

Thanks for getting back to us, and I will wait for your update.

Jes

From: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Sent: Tuesday, November 1, 2022 5:47 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Subject: RE: EXTERNAL: YNLRO-CNSC Meeting & Wheeler River Draft EIS

Hi Garrett,

I am not 100% sure on the UMM ROR agenda for the 15th or 16th of December but we should know soon. When the agenda is released I will make sure I share asap with YNLR.

Garrett perhaps lets chat more on Thursday about next steps. There are a number of things going on and want to make sure we are all on the same page on these files moving forward.

Jes we can provide a bit more of an update later this week or early next if that works on next meeting for Denison.

Thanks,
Ryan

From: Garrett Schmidt <garrett.schmidt@yathinene.com>
Sent: November 1, 2022 11:10 AM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Subject: RE: EXTERNAL: YNLRO-CNSC Meeting & Wheeler River Draft EIS

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hello Jessica,

It was a pleasure to meet you as well.

Yes, we are aware that the CNSC is conducting their conformity review. Do you have a date for when the 90 day public review will begin? Or perhaps a range of dates as this will impact when we mobilize our resources to start the EIS review.

Yes, it is possible to arrange a next meeting to discuss Wheeler. I'm speaking to Ryan on Thursday about our TOR schedule. I suspect a virtual meeting regarding Wheeler will be most likely before the Xmas break. I would prefer this meeting to either just be with YNLR staff and/or with our ALPC (TOR group). Scheduling a time that works for everyone is always the challenge. December 15th or 16th may be an option.

Ryan – do you know when the ROR hearing is scheduled with the Commission? Has an agenda been developed as we could align a Wheeler river meeting post-ROR intervention.

In terms of a reoccurring meeting with YNLR staff, this is possible. However, it is unlikely to do this with the ALPC.

Regards,

Garrett

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: October 24, 2022 4:26 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Subject: EXTERNAL: YNLRO-CNSC Meeting & Wheeler River Draft EIS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Garrett,

It was great to get to meet with and present to Ya' Thi Néné in person last month. As you are probably aware from the email I sent out earlier today, CNSC staff have received the Environmental Impact Statement for the Wheeler River project. We are currently conducting our 30-day review to determine whether it conforms with the CNSC's Generic EIS Guidelines.

I am reaching out because we are hoping it would be possible to meet in the coming month or so, to talk about next steps of the consultation process. Ultimately, we'd also like to schedule a reoccurring meeting - at whatever frequency your team would be comfortable with. I realize there are meetings that will take place under the Terms of Reference, but I am specifically referring to meetings on the proposed Wheeler River Project. I am not sure if the board that we met with during the Terms of Reference kick off would also be the team we worked with for consultation on this project, so please let me know who would need to be invited to any project specific meetings.

If there are particular weeks that might work for you over the next 4-6 weeks, let me know which and I can propose some time slots. Alternatively, if you'd prefer to provide some dates and times that work for you, let us know and I can see if one will work for CNSC project team. If this would be easier over the phone, please don't hesitate to give me a call.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#);
[Cheyenna Hunt](#); ['jerry.bernard@erfn.net'](#); ['nvp.mike@sasktel.net'](#);
['wsmith@kineepik.ca'](#); ['bnatomagan@kineepik.ca'](#);
['glenmccallum@mns.work'](#); ['Brent Laroque'](#); ['Shannon Landrie-Crossland'](#);
['garrett.schmidt@yathinene.com'](#); ['shea.shirley@yathinene.com'](#);
['kevin.mercredi@outlook.com'](#); [b-tsannie@hotmail.com](#);
Bcc: [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#);
['d.classen@sasktel.net'](#); ['chief1@birchnarrows.ca'](#);
['norma.catarat@brdn.ca'](#); ['receptionist@mltc.net'](#);
['claire_larock@hotmail.com'](#); ['karenbird@pbcn.ca'](#); ['tmerasty@pbcn.ca'](#);
['bmerasty@pbcn.ca'](#); ['tcooksearson@llrib.ca'](#); ['jtsanniejr@pagc.net'](#);
['gchristiansen@llrib.ca'](#); ['cheyenna.hunt@desnedhe.com'](#);
[karenbird@pbcn.ca](#);
Subject: RE: Wheeler River Project EIS Conformity Review Passes and Public
Comment Period Begins
Sent: 2022-11-21 3:42:00 PM

Sorry all - Correction, the deadline for comments is **February 18th 2023**.

From: Wheeler River Project - Projet de Wheeler River <Wheelerriver@cnscccsn.gc.ca>
Sent: Monday, November 21, 2022 3:34 PM
To: Wheeler River Project - Projet de Wheeler River <Wheelerriver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

Hi Everyone,

In update to my email below, Canadian Nuclear Safety Commission (CNSC) staff undertook a conformity review of Denison's draft environmental impact statement (EIS) submission, and we have now deemed the submission **complete**. The letter to Denison has been posted to the Canadian Impact Assessment Registry (the Registry), as has the draft EIS and executive summary, along with all appendices and technical support documents.

The CNSC is now seeking comments during a 90-day public comment period on Denison's draft EIS, for the proposed Wheeler River Project. For the purposes of this comment period, the draft EIS and supporting documents can be accessed by visiting [All Records](#) for the project. The EIS can also be found under Key Documents, located on the main Registry page for the [Wheeler River Project](#), as well as here: <https://iaac-aeic.gc.ca/050/evaluations/document/145552>

The draft EIS provides an analysis of the project's potential environmental effects and measures to mitigate those potential impacts. The public comment period gives Indigenous nations and communities, members of the public, and government departments and agencies an opportunity to submit their views in writing to the CNSC on the adequacy of the information presented in the EIS, as measured against the [*Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012*](#) (the Guidelines), and on the technical merit of the information presented. The Guidelines provide direction to the proponent and identify the information that is required in the EIS.

Written comments must be submitted by **February 18, 2023** to:

Jes Way

Environmental Assessment Officer

Email: wheelerriver@cnscccsn.gc.ca

All comments on the draft EIS will be posted on the Registry in the language in which they were received. If you have any questions about this or anything else, please don't hesitate to reach out to our team.

Sincerely,
Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Wheeler River Project - Projet de Wheeler River <Wheelerriver@cnscccsn.gc.ca>
Sent: Monday, October 24, 2022 11:28 AM
To: Wheeler River Project - Projet de Wheeler River <Wheelerriver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Received - Conformity Review Underway

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day

public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213

Subject: FW: YNLR-CNSC Working Group Meeting (Q1)
Location: Microsoft Teams Meeting; 101-22nd Street East, Suite 520, Saskatoon

Start: Thu 2023-01-12 10:30 AM
End: Thu 2023-01-12 6:00 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Garrett Schmidt

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES
PREUVE DE PRUDENCE

Hello CNSC staff,

Please see attached meeting agenda and link below for tomorrows meeting between CNSC and YNLR Working Group.

Please click on link in Draft agenda below and not the one on bottom of the page in yellow to connect. You do not need to attend the entire meeting but would appreciate if the Project officers and SMEs are available as discussed to provide updates on your projects and answer questions as per the agenda below.

UMM staff - we will likely be talking UMM updates likely around 10:00- 11:00 am and EA staff likely around 11 am. Jessica/Wish and Nicole/Doug I can message you after we have discussed updates on UMM files if that works ?

See most of you tomorrow!

Thanks,
Ryan

-----Original Appointment-----

From: Garrett Schmidt <garrett.schmidt@yathinene.com>

Sent: December 23, 2022 10:40 AM

To: Garrett Schmidt; m.dene.64@gmail.com; alsplace1@sasktel.net;
ford_150_pickup@hotmail.com; archie.disain@outlook.com; fjosephthroassie56@outlook.com;
lebstill@gmail.com; Louise E BougieStill; Dana Kellett; Celeste Robillard; Froess, Ryan; Nickolet,
Sydney

Cc: Bruce Hanbidge

Subject: YNLR-CNSC Working Group Meeting (Q1)

When: January 12, 2023 9:30 AM-5:00 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting; 101-22nd Street East, Suite 520, Saskatoon

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Draft agenda:

**Ya'thi Néné Lands and Resources/Canadian Nuclear Safety
Commission**

YNLR-CNSC Working Group Meeting

January 12th 2023, 9:30am-5:00pm

101-22nd Street East, Suite 520, Saskatoon (CNSC Downtown Office)

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 231 255 016 619

Passcode: 2VeITW

[Download Teams](#) | [Join on the web](#)

Or call in (audio only)

[+1 647-749-9265,,29182918#](#) Canada, Toronto

[\(844\) 632-5179,,29182918#](#) Canada (Toll-free)

Phone Conference ID: 291 829 18#

Attendees:

Mary Denechezhe - ALPC Member (Hatchet Lake)
George St. Pierre – ALPC Member (Hatchet Lake)
Archie Disain - ALPC Member (Black Lake)
Freddie Throassie - ALPC Member (Black Lake)
Chris Toutsaint - ALPC Member (Fond du Lac)
Mervin Adam - ALPC Member (Fond du Lac)
Louise Bougie-Still - ALPC Member (PRO – Uranium City)
Al Sayn - ALPC Member (PRO – Stony Rapids)
Garrett Schmidt - YNLR Executive Director (Co-Chair)
Dana Kellett – YNLR Environmental Specialist
Ryan Froess – CNSC Senior Advisor (Co-Chair)
Sydney Nickolet – CNSC Policy Officer
Celeste Robillard – YNLR Admin/Comms Assistant

Agenda:

- Opening Prayer and introductions
 - Review and adopt Agenda
 - Review and adopt previous meeting minutes (Sept 26, 2022)
 - CNSC update on proponent activities in Nuhenéné
 - Cluff, SRC, Beaverlodge, Key/McArthur/Rabbit
 - Denison, NexGen, Fission
 - YNLR update on proponent engagement activities in Nuhenéné
 - LUNCH
 - TOR workplan review and proposed meeting schedule for 2023
 - Discussion – IEMP (Rabbit & Lorado/Gunnar/Beaverlodge) and other monitoring programs (ICP, EARMP, CBEMP, compliance inspection)
 - Discussion – Enhancing info sharing with community members
 - Other Business
 - Closing Prayer & Meeting Adjournment
-

NOTE: DO NOT USE the below Teams meeting invite call in & login details but rather the invite details noted in the agenda (above)

Microsoft Teams meeting

Join on your computer, mobile app or room device

[Click here to join the meeting](#)

Meeting ID: 226 226 191 371

Passcode: 9kDGVX

[Download Teams](#) | [Join on the web](#)

Or call in (audio only)

[+1 639-398-8262,,307206157#](#) Canada, Saskatoon

Phone Conference ID: 307 206 157#

[Find a local number](#) | [Reset PIN](#)

[Learn More](#) | [Meeting options](#)

—

From: [Way, Jessica](#)
To: [Yen, Wish](#)
Subject: FW: YNLR Industry Update
Sent: 2023-01-13 11:47:10 AM

FYI

From: Nickolet, Sydney <sydney.nickolet@cnsccsn.gc.ca>
Sent: Friday, January 13, 2023 11:44 AM
To: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Subject: YNLR Industry Update

Hey Jess – here is the short update that YNLR shared with us yesterday.

Cheers,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnsccsn.gc.ca
Phone: 306-491-3371

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nickolet@cnsccsn.gc.ca
Phone: 306-491-3371

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and
Homeland of the Métis*

*Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la
patrie des Métis*



YNLR-CNSC Terms of Reference
Ya'thi Néné Land and Resource Office – Industry Update
January 12th, 2023

- Licensees:
 - Cameco/Orano
 - Ongoing Collaboration Agreement meetings
 - Opportunities for increased partnership being discussed
 - CBEMP 2022 (Ucity/CP, ongoing), CBEMP 2023 (planned for Black Lake)
 - Upcoming interventions: Beaverlodge, Rabbit/Key/McArthur, Cluff
 - SRC
 - Initial meeting in November 2022
 - SRC requested for proposal from YNLR involvement; submission Jan 13th
 - Anticipated agreement to be negotiated for increased YNLR participation in site tours, monitoring/sampling and plan review
- Applicants:
 - Denison
 - Exploration Agreement signed, October 2022
 - Anticipate start of Impact Benefit Agreement negotiations Q1/Q2 2023 for Wheeler River
 - Community tour planned (Jan 23-25)
 - YNLR preparing Wheeler River EIS comments for submission February 12th
 - NexGen
 - Engagement Agreement under negotiation
 - Site visit and community tour anticipated in Q1-Q3 of 2023
 - Waiting for CNSC response to YNLR EIS comments
- Potential future applicants:
 - Fission
 - Engagement Agreement signed, June 2022
 - Completed site visit and community tour (FDL & BL)
 - Reviewed Terms of Reference and Project Description and provided comment
 - UEC
 - No communication to date



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

Canada

Wheeler River Project

Participation of the Ya' thi Néné Lands and Resource Office



Jessica Way, Wish Yen, Ryan Froess and Sydney Nickolet

nuclearsafety.gc.ca

January 12, 2023

e-Doc: 6942841

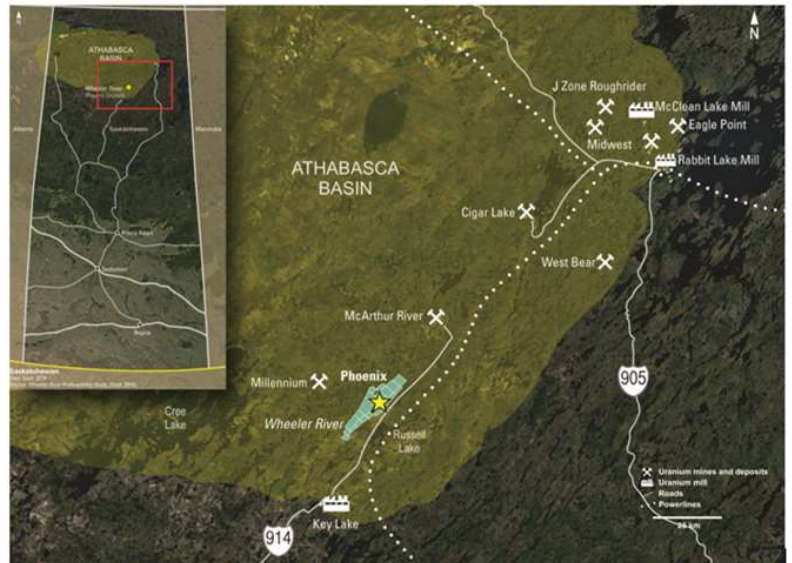
Canada

Introduction



Wheeler River Project – Update

- Proposed uranium mine and processing plant in the eastern area of the Athabasca Basin region
- *In situ* recovery mining process and precipitation processing plants
- Closed loop process reusing water from precipitation process to re-inject into *in situ* recovery mining



2

Denison is proposing to develop an in situ recovery uranium mine and processing plant 35km NE of Key Lake Mill and 35km SW of the McArthur River Mine.

The Phoenix deposit, which they are proposing to mine, is shown here by the little star on the map.

The proposed in-situ mining method would involve injecting a solution into the ground to dissolve uranium from the surrounding rock. This would be done through injection wells, and then brought back to the surface through recovery wells for processing. The in-situ mining process would be a closed loop process, reusing the water from the process, re-injected into the in-situ process – as a result, no underground or open pit mines are required and there will be no tailings.



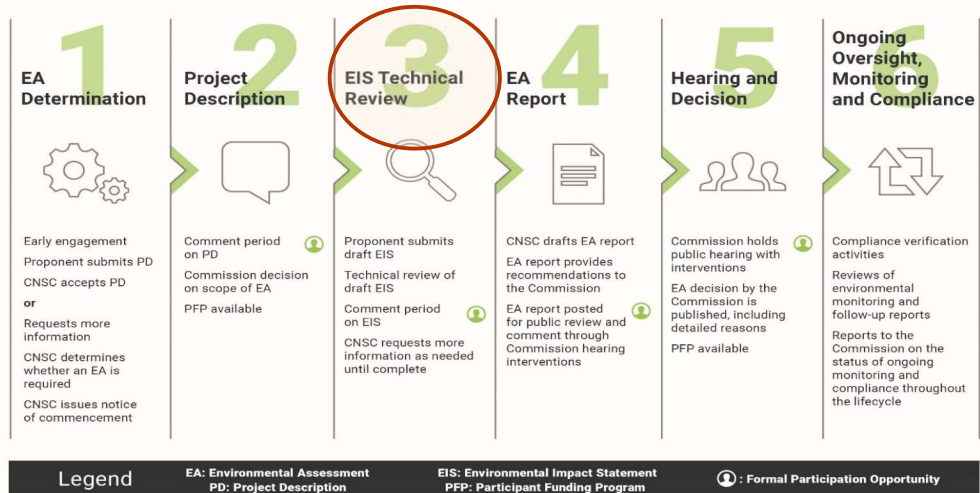
Wheeler River Project – Update

Canadian Nuclear Safety Commission Environmental Assessment Process under the *Canadian Environmental Assessment Act*, 2012

Ongoing public engagement and Indigenous consultation throughout the EA process

90-day Public and Indigenous Comment Period ends on:
February 18th

EIS technical review ends on:
March 21st

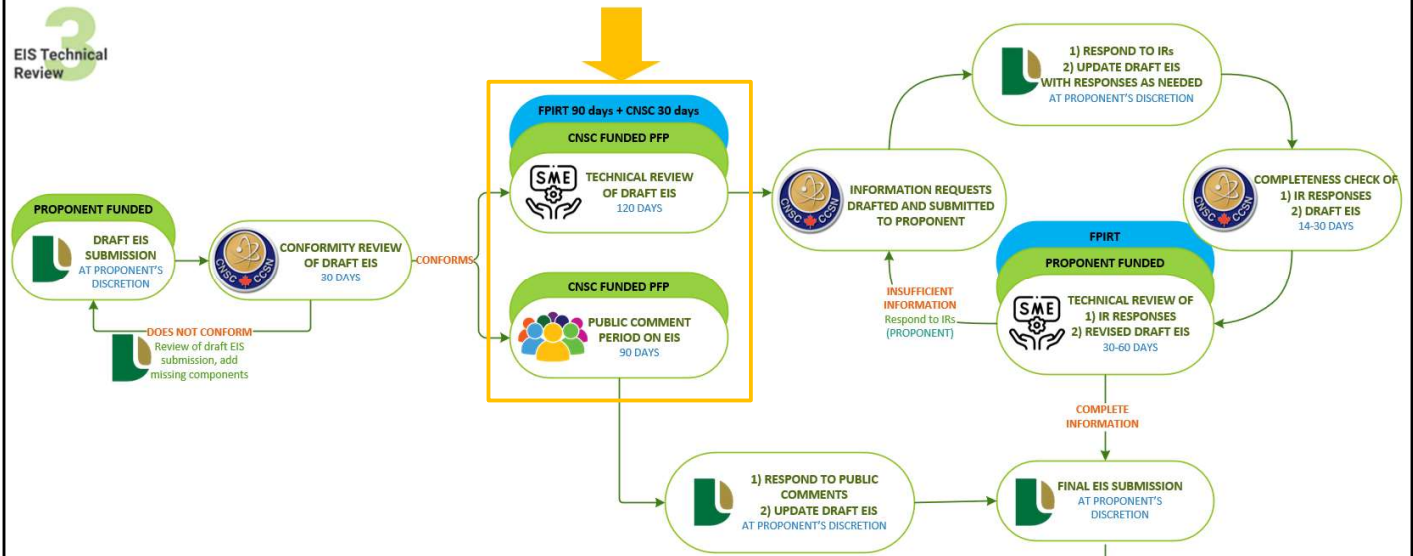


This slide shows the 6-step environmental assessment process. The project kicked off in 2019 and the last time we were in front of YNLRO, the proposed project was still in step two of the process. Since then, Denison has submitted the draft Environmental Impact Statement - the public and Indigenous comment period is underway, and the CNSC is leading the EIS technical Review phase, which will be completed in March.



Wheeler River Project – Update

3
EIS Technical Review



Here is a more detailed slide that shows where we are within the step three of the process.

To provide a bit of a timeline of what has happened since we last met:

- On October 21st, 2022– We received the draft EIS package and conducted the 30 day conformity review to ensure we had everything we need to move on to the technical review
- On November 18th, 2022 - We determined that conformity review had passed, and could move on to the EIS technical review and the 90 day public and Indigenous comment period
- On November 21st, 2022 - The EIS technical review began. So this is where we are right now (yellow box and arrow)
 - FPIRT review is a 120 day review, whereby the Federal Indigenous Review Team, including the CNSC staff and other federal departments are reviewing the content in detail.
 - On this same day, the 90-day public and Indigenous comment period opened up – this closes on February 18th, deadline applies to YNLRO as a PFP recipient.
- The outcome of this process will be IRs to Denison to respond to, and when it comes to the EIS technical review, we will continue an iterative review process until Denison has provided adequate responses to all of the questions and concerns that we provide to them. The circular diagram shows this iterative work

- Denison will also be required to respond to comments provided through the public and Indigenous comment period



Public and Indigenous Comment Period

We want to know what the communities think of the information that Denison presents in the EIS



Deadline for submission of comments: ***February 18th***

5

For the Public and Indigenous comment period, the CNSC wants to hear from the communities to:

1. Learn about what Denison has written in the EIS
 - Did Denison capture your concerns accurately within the EIS? Did they miss anything?
 - Did Denison propose solution that will resolve your concern? Why or Why not?
 - Do you have solutions you'd like to propose?
2. Discuss the above topics
 - Was something missed in the EIS for a topic?
 - How does a specific topic affect you or your community?
 - Was your concern shared with Denison?
3. Summarize these discussions

These discussions will inform information requests for Denison and provide information to subject matter experts reviewing the EIS.



Next Steps of the EA Process with YNLRO

- Incorporation of Traditional Knowledge and Land Use Studies
 - Drafting of **What We Heard Report** and review by YNLRO
- **Discussions on impacts**, related to: health and socio-economic conditions, physical and cultural heritage, current use of lands and resources for traditional purposes, or structures and sites of historical, archaeological, paleontological or architectural significance.
 - Review **Issues and Concerns Tables** drafted by CNSC
- Review **Rights Impact Assessment** report drafted by CNSC
- Review relevant sections of the **EA Report**
- Regular correspondence and meetings to collaborate and share project updates

6

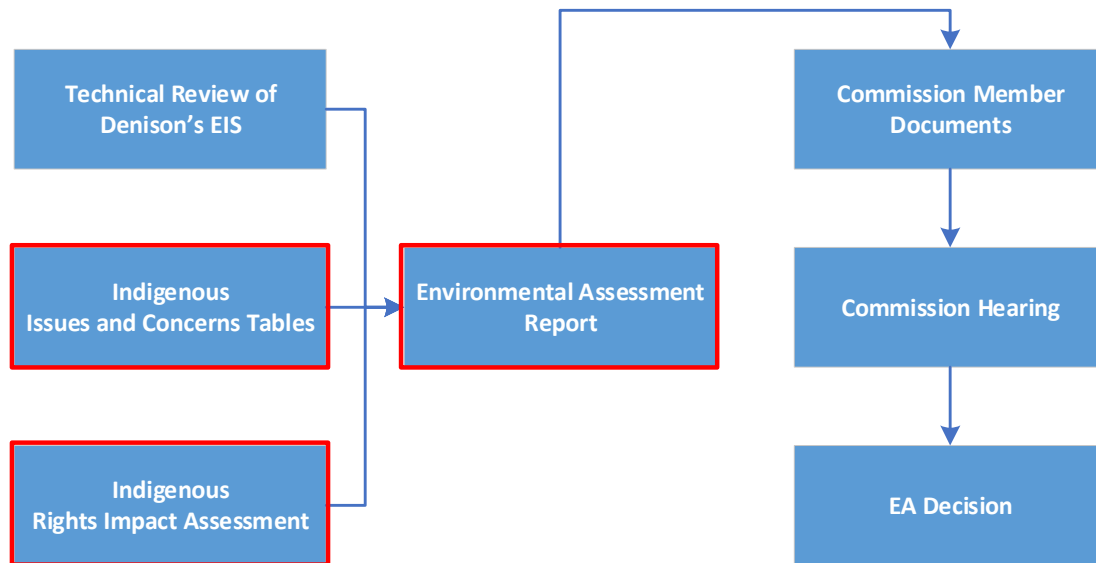
The next steps of the process include reviewing the Rights Impact Assessment report and Issues and Concerns tables drafted by the CNSC. CNSC wanted to offer collaborative drafting of relevant sections of the EA report as well.

Concerns related to impacts to areas where you practice traditional activities?

- (i) health and socio-economic conditions
- (ii) physical and cultural heritage,
- (iii) the current use of lands and resources for traditional purposes (hunting, fishing, harvesting)
- (iv) any structure, site or thing that is of historical, archaeological, paleontological or architectural significance



Outputs of the EA process



The first three boxes on the left all feed into the EA report, which recommendations by CNSC staff in the Commission Member Documents (CMD) are based upon.

The EA Report will be appended to the licensing CMD. The contents of the EA Report are not intended to be repeated in the CMD. These two documents have different purposes and conclusions, leading to decisions under different legislations.

- The EA Report draws conclusions as to significant adverse effects to the environment, and a decision under CEAA 2012.
- The CMD reports are provided to Commission members. A hearing is held and with information from the CMD and hearing, the Commission provides a decision on EA process.

CNSC will request that YTLRO validates the issues and concerns tables as well as provide a review of the RIA – participation in the EA Report which informs the CMD will also be possible.



Objectives of the Rights Impact Assessment

- RIA helps fulfill the duty to consult under s. 35 of the Constitution Act for projects undergoing EA and/or licensing processes led by the CNSC

Objectives:

- take into account all the potential impacts on Indigenous and/or Treaty rights
- provide clear and complete information and analysis regarding potential impacts on rights with regards to inform the Commission's decision

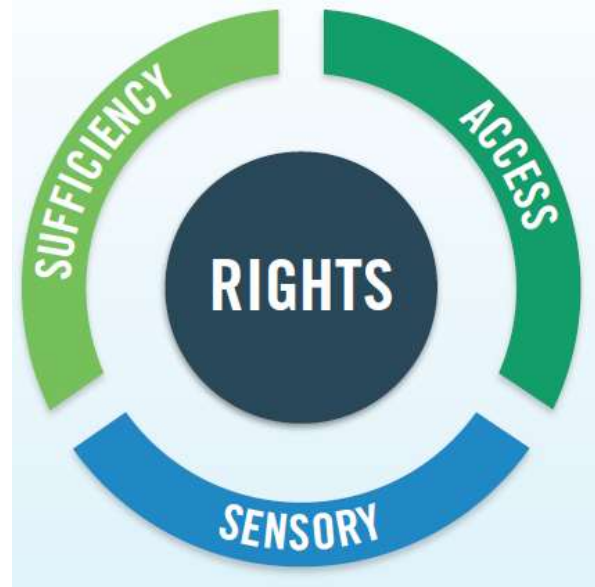
8

The CNSC's approach to consultation is aligned with current and evolving requirements and expectations of the courts, legislation, and best practices and approaches across the federal government



Impacts to Treaty Rights?

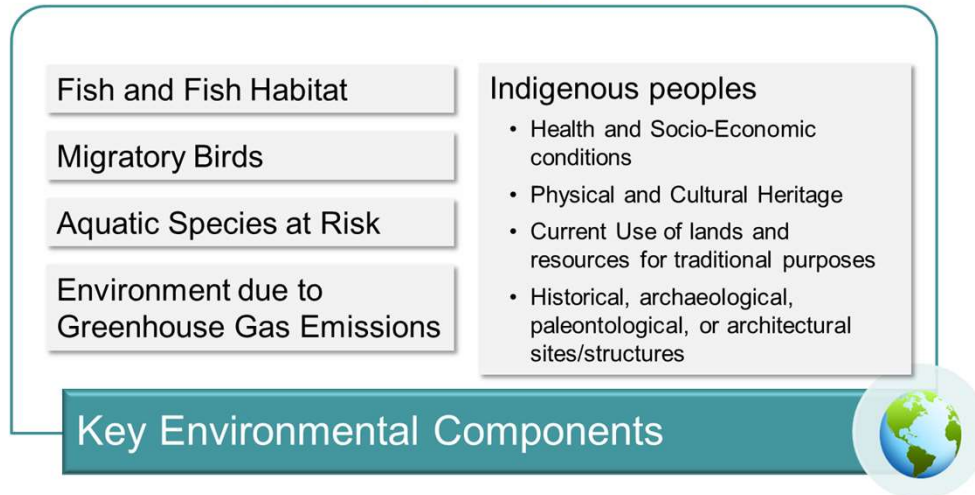
- What are your concerns about the how the Project may impact your rights? What aspects of these rights are you concerned will be impacted?
- What effects of changes to the environment from the Project on the current use of lands and resources and physical and cultural heritage could also impact the right?
- Are there any biophysical environmental effects that are not captured that could also impact the right?





Section 5(1)(c) under CEAA 2012

Discussions on environmental effects resulting from the Wheeler River Project, impacting Ya'thi Néné through:



10

CNSC wants to engage on all aspects of the EIS, but as part of section 5(1)(c), we want to hear about environmental effects resulting from Wheeler River on the Ya'thi Néné through key environmental components – including.....

Example questions:

Concerns of impacts to areas where you practice traditional activities?

- (i) health and socio-economic conditions
 - Do you swim, go boating or participate in activities in the surrounding lakes?
 - How frequently?
 - Do you own a business that depends on camping or other tourist activities in this area?
- (ii) physical and cultural heritage,
 - How do you currently use the land?
 - Are there concerns for additional roads built?
- (iii) the current use of lands and resources for traditional purposes (hunting, fishing, harvesting)
 - Do you fish in the surrounding lakes?
 - Do you hunt or harvest in areas near the proposed facilities?
 - What seasons are you around this area?
 - Are there specific animals or fish that you hunt only in this area?
- (iv) any structure, site or thing that is of historical, archaeological,

paleontological or architectural significance

- Are there sites that are of cultural or historical significance?
- Are there sites that you are concerned or which can potentially be impacted?



Participate and Be Heard

- 90-day public comment period
- Stay up to date on latest updates for the Wheeler River Project on the CIAR (reference number [80178](#))
- Questions about the project can be emailed to Jes Way, EA Lead at: WheelerRiver@cnsc-ccsn.gc.ca



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

Questions?

Thank You!

Canada 

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nuclearsafety.gc.ca



From: [Way, Jessica](#)
To: garrett.schmidt@yathinene.com
Cc: [Bruce Hanbidge](#); [Froess, Ryan](#); [Nickolet, Sydney](#); [Yen, Wish](#); [Wylie, Doug](#);
Subject: Update on Wheeler River Environmental Assessment - CNSC Presentation
Jan 12, 2023
Sent: 2023-01-17 1:04:18 PM

Hi Garrett,

Attached is the presentation provided on Thursday, related to the proposed Wheeler River EA. I've included the notes slides for additional information and context. Please let us know if you have any questions about this, and thank you for your time!

Regarding meeting in person on Wheeler, I am hoping to be in Saskatoon in person the week of **March 6th** – it could be the early part or second half of the week. Monday, Tuesday, Thursday or Friday would be ideal, if possible. I realize the Cluff Lake Mine hearing is the week before this, but the timing of the week we are proposing is fairly strategic. It would give us two weeks to review the EIS comment submissions prior to meeting, and two weeks after this to finalize our submission to Denison. Please let me know if there is a day this week that could work for you and your team. In addition to discussing the comments submitted by YNLRO, we would also like to include on the agenda:

- Kick off to 5(1)(C) discussions, particularly related to what is identified in the comments and TK study (see slides 10 and 11 of the presentation)
- Discussion on RIA work (what is coming, how this will look and timelines)

Related to our action items on the Rights Impact Assessment (RIA) work, here is the EA Report for the Near Surface Disposal Facility: <https://www.nuclearsafety.gc.ca/eng/the-commission/hearings/cmd/pdf/CMD22/CMD22-H7.pdf>

It's quite a long report and may take some time to download. Some sections that would be of interest, based on our discussion:

- p. 36 breaks down the report structure, of which the Wheeler EA will probably follow a similar format.
- P. 46 and 52 are just two (of many) examples of the "*Views expressed*" sections, which are found throughout the report. This is example text that we would want to have YNLOR review and comment on, during the EA Report writing phase.
- p. 139 is section 9.3 **Assessment of impacts to rights** – I think this could give a better idea about what we are talking about when we discuss the Rights Impact Assessment. Further down on p. 242 you will find the start of the Algonquins of Pikwàkanagàn First Nation RIA, which is included as an appendix.

One last thing I wanted to note, I couldn't see everyone around the table on Thursday but one of the concerns raised by a board member during the discussion was related to the fact that all of the project information is located on the internet, requiring internet and computer access, to access lengthy documents. I understand that Denison is going to be heading up the Athabasca Basin with

YNLRO next week. Janna has indicated that they are planning to share project summaries with YNLRO, and will have hard copies in hand to distribute at the meetings. Once these are posted to the Canadian Impact Assessment Registry for the Wheeler River project, I will share for your awareness.

Thanks,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsccsn.gc.ca | Tel: 343-540-6213

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Yen, Wish](#); [Nickolet, Sydney](#); [Way, Jessica](#); [Way, Jessica](#); [Cheyenna Hunt](#); '[jerry.bernard@erfn.net](#)'; '[nvp.mike@sasktel.net](#)'; '[wsmith@kineepik.ca](#)'; '[bнатomagan@kineepik.ca](#)'; '[glenmccallum@mns.work](#)'; '[Brent Laroque](#)'; '[Shannon Landrie-Crossland](#)'; '[garrett.schmidt@yathinene.com](#)'; '[shea.shirley@yathinene.com](#)'; '[kevin.mercredi@outlook.com](#)'; '[b-tsannie@hotmail.com](#)'; '[csayazie@hotmail.com](#)'; '[d.powder.nhsr@sasktel.net](#)'

Bcc: '[d.classen@sasktel.net](#)'; '[chief1@birchnarrows.ca](#)'; '[norma.catarat@brdn.ca](#)'; '[receptionist@mltc.net](#)'; '[claire_larock@hotmail.com](#)'; '[karenbird@pbcn.ca](#)'; '[tmerasty@pbcn.ca](#)'; '[bmerasty@pbcn.ca](#)'; '[tcooksearson@lrib.ca](#)'; '[jtsanniejr@pagc.net](#)'; '[gchristiansen@lrib.ca](#)'; '[cheyenna.hunt@desnedhe.com](#)'; '[karenbird@pbcn.ca](#)'; [Kwamena, Nana-Owusua](#);

Subject: Reminder: Wheeler River Project Public and Indigenous Comment Period

Sent: 2023-01-18 7:34:00 PM

Hi Everyone,

Just sending a reminder that if you would like to provide comments on the Wheeler River Environmental Impact Statement, they are due on **February 18th, 2023**. Please feel free to share with anyone that would be interested in providing a submission during this comment period.

If you have any questions about the information in these emails, please don't hesitate to contact me at the information below.

Thanks,

Jes Way

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnsc-ccsn.gc.ca | Tel: 343-540-6213

From: Way, Jessica
Sent: Monday, November 21, 2022 3:42 PM
To: Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnsc-ccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnsc-ccsn.gc.ca>; Yen, Wish <wish.yen@cnsc-ccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnsc-ccsn.gc.ca>
Subject: RE: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

Sorry all - Correction, the deadline for comments is **February 18th 2023**.

From: Wheeler River Project - Projet de Wheeler River <Wheellerriver@cnscccsn.gc.ca>
Sent: Monday, November 21, 2022 3:34 PM
To: Wheeler River Project - Projet de Wheeler River <Wheellerriver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Conformity Review Passes and Public Comment Period Begins

Hi Everyone,

In update to my email below, Canadian Nuclear Safety Commission (CNSC) staff undertook a conformity review of Denison's draft environmental impact statement (EIS) submission, and we have now deemed the submission **complete**. The letter to Denison has been posted to the Canadian Impact Assessment Registry (the Registry), as has the draft EIS and executive summary, along with all appendices and technical support documents.

The CNSC is now seeking comments during a 90-day public comment period on Denison's draft EIS, for the proposed Wheeler River Project. For the purposes of this comment period, the draft EIS and supporting documents can be accessed by visiting [All Records](#) for the project. The EIS can also be found under Key Documents, located on the main Registry page for the [Wheeler River Project](#), as well as here: <https://iaac-aeic.gc.ca/050/evaluations/document/145552>

The draft EIS provides an analysis of the project's potential environmental effects and measures to mitigate those potential impacts. The public comment period gives Indigenous nations and communities, members of the public, and government departments and agencies an opportunity to submit their views in writing to the CNSC on the adequacy of the information presented in the EIS, as measured against the [Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012](#) (the Guidelines), and on the technical merit of the information presented. The Guidelines provide direction to the proponent and identify the information that is required in the EIS.

Written comments must be submitted by **February 18, 2023** to:

Jes Way
Environmental Assessment Officer
Email: wheellerriver@cnscccsn.gc.ca

All comments on the draft EIS will be posted on the Registry in the language in which they were received. If you have any questions about this or anything else, please don't hesitate to reach out to our team.

Sincerely,
Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Wheeler River Project - Projet de Wheeler River <Wheellerriver@cnscccsn.gc.ca>
Sent: Monday, October 24, 2022 11:28 AM
To: Wheeler River Project - Projet de Wheeler River <Wheellerriver@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>
Subject: Wheeler River Project EIS Received - Conformity Review Underway

Hi Everyone,

This email is to update you on the status of the proposed Wheeler River Project Environmental Assessment (EA) process. Denison submitted the draft Environmental Impact Statement (EIS) and supporting documents to the Canadian Nuclear Safety Commission (CNSC) on Friday, October 21, 2022.

CNSC staff are now beginning our conformity review. Should this review be successful, Denison will be notified that a technical review will commence. If the conformity review passes, the EIS and related documents will be posted to the [Canadian Impact Assessment Registry](#), and the 90 day public comment period will begin. If this project proceeds to the next step, an additional notification will be sent here, to the project distribution list.

If you have any questions about this proposed project or anything related to the EA, please don't hesitate to reach out.

Sincerely,
Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: [Way, Jessica](#)
To: [Yen, Wish](#); [Froess, Ryan](#); [Nickolet, Sydney](#);
Subject: FW: EXTERNAL: RE: EXTERNAL: RE: extension request from YNLR for written submission regarding Denison's Wheeler River Project EIS
Sent: 2023-02-08 11:33:49 AM

FYI

From: Dana Kellett <dana.kellett@yathinene.com>
Sent: Wednesday, February 8, 2023 9:55 AM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: RE: EXTERNAL: RE: EXTERNAL: RE: extension request from YNLR for written submission regarding Denison's Wheeler River Project EIS

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

That's fantastic news – thanks very much, Jes. We will certainly submit a draft on or before 25 February.

Best,
Dana

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: February 7, 2023 7:26 PM
To: Dana Kellett <dana.kellett@yathinene.com>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: EXTERNAL: RE: EXTERNAL: RE: extension request from YNLR for written submission regarding Denison's Wheeler River Project EIS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Dana,

I am writing to inform you that a two week extension has been granted to Ya'thi Néné Lands and Resources for the Wheeler River EIS comment period, with one caveat: please provide an informal draft of the submission one week in advance of the extended deadline. This will give us time to review YNLR's comments prior to our March 8th in person meeting, so that we can be better prepared to discuss any issues or concerns raised in the submission.

With this in mind, a draft submission is due on [February 25th](#), and the final version due on [March 4th, 2023](#).

I would also like to note, the 90 days allotted for this comment are already an extension to our usual time frame for this step of the process, and no further time can be granted. We thank you for your understanding and if you have any questions, please don't hesitate to let me know.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Dana Kellett <dana.kellett@yathinene.com>
Sent: Monday, February 6, 2023 10:40 AM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: RE: EXTERNAL: RE: extension request from YNLR for written submission regarding Denison's Wheeler River Project EIS

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Hi Jes – thanks for the update.
Dana

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: February 3, 2023 3:58 PM
To: Dana Kellett <dana.kellett@yathinene.com>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: EXTERNAL: RE: extension request from YNLR for written submission regarding Denison's Wheeler River Project EIS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Dana,

Thank you for your email. We are reviewing your request and will get back to you early next week.

Have a great weekend.

Sincerely,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Assessment Officer | Environmental Assessment Division
Canadian Nuclear Safety Commission | Government of Canada
Jessica.Way@cnscccsn.gc.ca | Tel: 343-540-6213

From: Dana Kellett <dana.kellett@yathinene.com>
Sent: Thursday, February 2, 2023 4:03 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: extension request from YNLR for written submission regarding Denison's Wheeler River Project EIS

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Greetings Jessica –

Ya'thi Néné Lands and Resources is requesting a two-week extension for our written submission for the Denison Wheeler River Project EIS intervention, currently set at 18 February 2023. Review of this lengthy document is taking some time, and we are requesting this extension to enable YNLR to formulate a more thorough and thoughtful response.

Thanks for considering, and all the best.

Dana

Dana Kellett, PhD
Environmental Specialist

Ya'thi Néné Land and Resource Office
100-335 Packham Avenue
Saskatoon, SK S7N 4S1

Office: 306-477-1251
Cell: 306-280-1142

Email: dana.kellett@yathinene.com
www.yathinene.ca



From: [Yen, Wish](#)
To: [Garrett Schmidt](#); Dana Kellett; [Bruce Hanbidge](#);
Cc: [Boser, Sydney](#); [Froess, Ryan](#); [Way, Jessica](#);
Subject: 2023-03-08 YNRLO-CNSC meeting minutes on the Wheeler River Project
Sent: 2023-03-17 4:40:35 PM

Good afternoon everyone,

Please find the meeting minutes for our in-person meeting minutes on March 8th below for your review.

Thank you and have a wonderful weekend,

Wish Yen (she, her, elle)

Environmental Assessment Officer | Agente en évaluation environnementale
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
wish.yen@cnscccsn.gc.ca | 343.553.2233



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of Canada

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Ya'Thi Néné Lands and Resource Office/ YNRLO-CNSC Meeting Minutes – Denison Mines Wheeler River Project

March 8, 2023 1:30-3PM CST

In-person participants: Garrett Schmidt, Bruce Hanbidge, Dana Kellett, Jessica Way, Ryan Froess and Sydney Nickolet

Virtual participants: Dennis Sherratt, Paul James, Konrad Grozkowski and Wish Yen

Public comment period

- Denison is required to address inquiries raised by the public comment period throughout the entire EA process by engaging with each Nation and will need to provide responses by the final EIS submission
- CNSC's expectations are that Denison will be communicating and engaging with YNLRO on the comments provided throughout the EA process to ensure concerns are adequately addressed

CNSC regulatory process

- Usually the EA and licensing process are concurrent, but Denison has applied for the EA process ahead of the licensing process. Denison has committed to share the draft Facility Description Manual (FDM) and the management systems document before providing it to the CNSC for review.
- Denison is aware that there are gaps in the EIS that will be addressed in future iterations of the document
 - Denison plans to use the feasibility study and more detailed technical licensing process to address planning for the monitoring and follow-up programs. A lot more technical information will be required by CNSC staff and provincial regulators to address concerns with respect to mitigation and monitoring for the project

CNSC-YNLRO engagement

- CNSC wants to ensure the dialogue between YNLRO and CNSC is sufficient while capturing and addressing issues and concerns on the Wheeler River project
- CNSC staff have not drawn any conclusions based on the draft EIS submitted – we are currently analyzing the information provided and will be sending Denison a compiled table of information requests and advice to proponent
 - CNSC expects that Denison provides a response to all the IRs submitted
 - March 21st – Federal IRs will be shared with Denison and posted to the [Canadian Impact Assessment Registry](#)
- CNSC will share a timeline of project activities and link to comments
- Engagement activities that will be drafted by CNSC and would require review and validation from YNLRO
 - **Issues and concerns tables**
 - **Rights Impact Assessment**
 - **Draft EA report sections**
- As we approach RIA and issues and concerns engagement, CNSC wants to ensure that YNLRO is able to budget and plan for reviews and validation of these sections, which is why we have been emphasizing work to come, and next steps of the process
- September - In-person meetings are planned for the UMD RORs so might be a good opportunity to meet and follow up with YNLRO on in person outreach opportunity and next major milestones etc.

Issues and concerns raised

- Bruce raised cumulative effects as a concern
 - CNSC will be following the guidance under CEAA 2012 to assess cumulative effects ([Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012](#))
- Monitoring and follow-up programs
 - YNLRO and Denison still to have discussions regarding monitoring and follow-up programs to ensure residual effects are addressed and monitored
 - YNLRO-Denison have signed an exploration agreement with Denison. YNLRO and Denison are in discussions on other projects in YNLRO region and Garrett expects discussions around these exploration projects and the Wheeler River project will evolve over time towards broader IBA discussions. This could take some time and often are complex.
 - YNLRO expects Denison to include a more comprehensive monitoring plan within the EIS as the current monitoring plan is too vague.
 - Impact determination in the draft EIS is very low or non-existent, which results in the monitoring and follow-up program not being sufficiently detailed or adequate
 - YNLRO wants to be involved in development of monitoring and management programs
 - “Statistically robust” monitoring is required as there isn’t sufficient information built in statistics (adequate sample sizes and baselines etc)
 - CNSC - EEM programs have specific requirements for effluent, sediment, fish, benthic invertebrates, and water sampling with a statistical lens and will be required as will provincial monitoring to ensure the environment is protected
- Future conversations between YNLRO and Denison are expected to be captured in future EIS reports
- YNLRO is concerned that this project will set precedent for future ISR projects as Denison has identified that additional project sites may be submitted in the future so want to ensure regulators get it right.
 - CNSC highlights that as The Commission is an independent, quasi-judicial administrative tribunal and court of record, they are not beholden to any precedents

- CNSC staff can always recommend that additional measures or more stringent requirements are added to current or future licensees based on lessons learned, new standards or technologies etc.
- Fish are important to Northern people and the biggest impact usually results from access – usually overfishing as a result of a road being built rather than pollution
 - Dialogue with regulators is required to ensure harvest is monitored and adjusted
 - Gate at Key Lake currently prevents people from accessing a large portion of that area – positives for many and negatives for others.
- Terrestrial species at risk are not on the CNSC slide deck, YNLRO wants to ensure caribou, moose and species at risk are not dismissed
 - It is integral that agreements protecting the environment are in place prior to approvals being provided for the project
 - Lessons learned: A census of the Bathurst caribou herd populations showed they dropped significantly from 1986 to 2006. The NWT placed a limit on hunting quotas for outfitters and were challenged legally in court, during the ongoing court process, outfitters continued to hunt and populations couldn't be managed. It is necessary to ensure that limits and protections are placed in advance of the project approval to ensure similar delays don't occur in the event of a court case.

Action Items

- Adam to present on the new Indigenous and Stakeholder capacity fund at the March 16th meeting (complete)
- CNSC will share posting of the technical review IRs after March 21st
- CNSC will share a project timeline with high-level assumptions for engagement activities on the Wheeler Project
- CNSC will share this meeting's presentation and an example of the NSDF RIA report

Proposed meeting agenda for March 16th?

- Adam to present on the new Indigenous and Stakeholder capacity fund
- 2023 IEMP sampling plan discussions – March 24, 2023 meeting
- UMMD presentation on upcoming licensing renewal for Key Lake, McArthur River and Rabbit Lake Operations

-----Original Appointment-----

From: Garrett Schmidt <garrett.schmidt@yathinene.com>

Sent: February 1, 2023 1:43 PM

To: Garrett Schmidt; Yen, Wish; Way, Jessica; Froess, Ryan; Nickolet, Sydney; Dana Kellett; Bruce Hanbidge

Subject: YNLR-CNSC, Denison EIS

When: March 8, 2023 1:30 PM-4:30 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting; Saskatoon Teams Room; 100-335 Packham Ave

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

I'm not sure if I've forwarded this one to you yet.

-----Original Appointment-----

From: Garrett Schmidt <garrett.schmidt@yathinene.com>

Sent: Wednesday, February 1, 2023 1:04 PM

To: Garrett Schmidt; Way, Jessica; Froess, Ryan; Nickolet, Sydney; Dana Kellett; Bruce Hanbidge

Subject: YNLR-CNSC, Denison EIS

When: Wednesday, March 8, 2023 1:30 PM-4:30 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting; Saskatoon Teams Room; 100-335 Packham Ave

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Draft Agenda:

- [Comments from YNLRO on the Wheeler River draft EIS](#)
- [Process and next steps for Rights Impact Assessment Work](#)
- [Issues tracking tables](#)
- [5\(1\)\(c\) impacts](#)

Microsoft Teams meeting

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From: [Boser, Sydney](#)
To: [Garrett Schmidt](#)
Cc: [Levine, Adam](#); [Froess, Ryan](#); [Yen, Wish](#); [Way, Jessica](#);
Subject: YNLR WWH Report - for feedback
Sent: 2023-06-16 4:19:00 PM

Good afternoon Garrett,

Over the recent months, CNSC staff have been implementing a new practice of developing “What We Heard” reports, in response to Indigenous Knowledge studies. The purpose of this document is to summarize what CNSC staff understood from YNLR’s Traditional Knowledge, Land Use and Occupancy Information Study, for discussion purposes. We welcome comments from YNLR on how we have captured this information and would be happy to meet and discuss further if needed. Once finalized, CNSC would work with YNLR to ensure that the information captured is accurate for sharing with CNSC subject matter experts to ensure a fulsome review of future iterations of the Wheeler River draft EIS.

We are seeking feedback on the report by July 31st, 2023.

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nickolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and
Homeland of the Métis*

*Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la
patrie des Métis*

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)
cheyenna.hunt@desnedhe.com; jerry.bernard@erfn.net;
nvp.mike@sasktel.net; wsmith@kineepik.ca; bnatomagan@kineepik.ca;
glenmccallum@mns.work; blaroque@mns.work; [Shannon Landrie-Crossland](#); rsmith@mns.work; sfladager@mns.work; aspriggs@mns.work;
mbrunet@mns.work; garrett.schmidt@yathinene.com;
shea.shirley@yathinene.com; dana.kellett@yathinene.com;
bruce.hanbidge@yathinene.com; kevin.mercredi@outlook.com; b-tsannie@hotmail.com; csayazie@hotmail.com; d.powder.nhsr@sasktel.net;
d.classen@sasktel.net; claire_larock@hotmail.com;

Bcc: chief1@birchnarrows.ca; andrew@tamarackenvironmental.ca;
trevor.moberly@birchnarrows.ca; robert.sylvester@birchnarrows.ca;
kimsylvestre@birchnarrows.ca; conrad.sylvester@birchnarrows.ca;
terrie.campbell@birchnarrows.ca; douglas.barks@birchnarrows.ca;
norma.catarat@brdn.ca; receptionist@mltc.net; karenbird@pbcn.ca;
tmerasty@pbcn.ca; bmerasty@pbcn.ca; patti@mccunn-miller.com;
cbeatty@pbcn.ca; tcooksearson@llrib.ca; ty.roberts@llrib.ca;
ashley.carlson@llrib.ca; gchristiansen@llrib.ca; jtsanniejr@pagc.net;
rmcleod@pagc.net; mellissa.winfield-lesk@hatch.com; [Heidi Klein](#); [Janna Switzer](#); [Carolanne Inglis-McQuay](#); [Steven Coupland](#); [Sorouche Mirmiran](#);

Subject: CNSC Wheeler River EA Update - Public and Indigenous Comment Tables Posted

Sent: 2023-06-27 8:27:00 PM

Good evening everyone,

This email is to provide an update on the proposed Wheeler River Project Environmental Assessment process.

As you may be aware, the 90-day [public and Indigenous comment period](#) for the proposed Wheeler River draft Environmental Impact Statement (EIS) took place from November 21st, 2022 to February 18th, 2023. Canadian Nuclear Safety Commission (CNSC) staff have now reviewed [all comments received](#), and these been detailed in public comment tables. These can be found on the Canadian Impact Assessment Registry at the following links:

- [Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement - For Denison Response](#)
- [Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement - For CNSC Response](#)

It is expected that Denison, CNSC staff and any other parties provide responses to these comments by the time a final EIS is submitted. These will be posted to the registry at a later date, along with

the Final EIS.

If you have any questions, please don't hesitate to reach out to our team.

Sincerely,

Wheeler River Project Team

wheelerriver@cnsccsn.gc.ca

Environmental Review Division | Division de l'examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

From: [Froess, Ryan](#)
To: [Bruce Hanbidge](#)
Cc: [Way, Jessica](#); [Yen, Wish](#); [Boser, Sydney](#);
Subject: CEAA 2012 - Guidance for assessing cumulative environmental effects
Sent: 2023-06-28 4:49:51 PM

Good afternoon Bruce,

Thanks for the call this morning and your questions on CEAA 2012 process and the Denison Wheeler River Project. As discussed please find attached the *Technical Guidance for Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012* under CEAA 2012.

[Technical Guidance for Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 - Canada.ca](#)

Please feel free to reach out to Jessica Way or myself if you have any additional requests and we will do our best to provide the additional information that you need.

Thanks ,

Ryan Froess
Senior Advisor/Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission

Conseiller principal/Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
ryan.froess@cnsccsn.gc.ca | Tél. Cell: 306-914-7892

From: [Nickolet, Sydney](#)
To: [Garrett Schmidt](#)
Cc: [Levine, Adam](#); [Froess, Ryan](#); [Yen, Wish](#); [Way, Jessica](#);
Subject: RE: YNLR WWH Report - for feedback
Sent: 2023-07-14 10:20:20 AM

Good morning Garrett,

I just wanted to follow up on my email from June 16th regarding the review of the What We Heard Report for the Wheeler River project and how it is coming along. If you would like to meet to discuss the report, we would be happy to set something up!

We are seeking feedback on the report by July 31st, 2023.

Hope you have a great weekend!
Thanks,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nicolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nicolet@cnscccsn.gc.ca
New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and
Homeland of the Métis
Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la
patrie des Métis*

From: Nickolet, Sydney
Sent: June 16, 2023 2:20 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Cc: Levine, Adam <adam.levine@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>;
Yen, Wish <wish.yen@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: YNLR WWH Report - for feedback

Good afternoon Garrett,

Over the recent months, CNSC staff have been implementing a new practice of developing “What We Heard” reports, in response to Indigenous Knowledge studies. The purpose of this document is to summarize what CNSC staff understood from YNLR’s Traditional Knowledge, Land Use and Occupancy Information Study, for discussion purposes. We welcome comments from YNLR on how we have captured this information and would be happy to meet and discuss further if needed. Once finalized, CNSC would work with YNLR to ensure that the information captured is accurate for sharing with CNSC subject matter experts to ensure a fulsome review of future iterations of the Wheeler River draft EIS.

We are seeking feedback on the report by July 31st, 2023.

Thank you,

Sydney Nickolet (she/her/elle)

Policy Officer, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
Email: sydney.nickolet@cnsccsn.gc.ca
New Phone Number: 343-596-9556

Agent(e) des politiques, Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
Email: sydney.nickolet@cnsccsn.gc.ca
New Phone Number: 343-596-9556

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and
Homeland of the Métis*

*Je reconnais que la terre sur laquelle je vis et travaille est le territoire traditionnel du Traité 6 et la
patrie des Métis*

From: [Bruce Hanbidge](#)
To: [Way, Jessica](#); [Nickolet, Sydney](#); [Dennis Sherratt](#); [Paul James](#);
Cc: [Megan Wallace](#); [Dana Kellett](#); [Yen, Wish](#);
Subject: RE: EXTERNAL: RE: EXTERNAL: RE: CNSC Procedural Review Discussion
Sent: 2023-08-21 4:00:14 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

Jessica:

We are all good with a noon (Saskatoon time) meeting on Thursday.

Respectfully

Bruce Hanbidge, B.Sc [Bio], BSc [Biochem], MA [Ecol]
Operations Manager
Ya'thi Néné Land and Resource Office



(P) 306-477-1251
(C) 306-380-4457
(F) 306-802-4895
www.yathinene.ca

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Monday, August 21, 2023 1:45 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>
Cc: Megan Wallace <megan.wallace@yathinene.com>; Dana Kellett <dana.kellett@yathinene.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Subject: EXTERNAL: RE: EXTERNAL: RE: CNSC Procedural Review Discussion
Importance: High

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Hi Bruce,

I wanted to check in on the time we have proposed for the presentation to specialists. Would this Thursday at noon work for you? I have a placeholder in the specialist's calendars. I realize the timing isn't ideal, but we are dealing with various time zones. Please let me know if this could work.

As well, I have included some minutes below from our call last week.

Thanks,

Coordinator, Dana Kellett – Environmental Specialist, Dennis Sherratt - Advisor, CNSC: Jes Way, Wish Yen and Sydney Nickolet

Notes from the chat:

- Update on Wheeler Completeness check
 - 238 outstanding Information Requests (IRs) from initial EIS technical review
 - Denison should be working with YNLR on their responses to comments through the public comment period
 - Denison submitted responses to those IR's but did not pass completeness check, information will be posted on the registry shortly
 - As we approach resolving the IR's, our team will start their assessments on the environmental effects and begin the EA report
- Presentation on the cumulative effects work by YNLR:
 - Bruce presented on the YNLR political cumulative effects study
 - Cumulative Effect Model (CEM) development:
 - Received funding from the federal govt
 - Enough funding for two years of analysis – focusing on all of Nuhenéné
 - Objective that this information will contribute to the province's policy on land management; help design, create and develop protective management plan that the province is working towards
 - Purpose of model is to utilize as a tool
 - This CEM allows for indigenous use within the model -> Provincial govt protected areas program would inform this
 - Similar methodology that the province follows on their woodland protection plans
 - Wheeler Example for SK-1 woodland caribou region
 - Looking at watershed areas within the Wheeler River regional study area as well as outside it; using ecosystem centered spatial boundaries
 - Compared to Denison's approach, quite a bit larger than regional study areas – scale is not representative of range of woodland caribou. Need to look at a representative area.
 - Also looking at indigenous use areas; what percentage of useable land exists
 - Approx. remaining less than 25% undisturbed area for woodland caribou in the area
 - Presented this information to the Province of Saskatchewan environmental assessment branch - asking if the methodology was consistent with their methodology (they say it is)
 - Referenced the blueberry case; YNLR supports the mine, but wants to see solutions where there are impacted areas, under the principles of adaptive management
 - Next steps to look at solutions for the impacted area - offsets, remediation
 - Have also conducted a preliminary assessment of area around Fission and NexGen projects; different results, but not in disturbed area as much, whereas Wheeler much more significant results
 - Met with Denison to discuss:
 - Focused on 3 main topics - woodland caribou, water and another

- Haven't got to the stage to present YNLR's presentation because Denison says there are not any cumulative effects and no impact to caribou
 - CNSC encourages YNLR to share the information with Denison, in order to continue conversations on the topic
- ACTION: Jes will follow up with CNSC experts and ECCC to present this information at a future meeting (complete)

From: Way, Jessica
Sent: Thursday, August 17, 2023 4:37 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Jessica.Way@cnscccsn.gc.ca
Cc: Megan Wallace <megan.wallace@yathinene.com>; Dana Kellett <dana.kellett@yathinene.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Subject: RE: EXTERNAL: RE: CNSC Procedural Review Discussion

Hi Bruce,

First, I wanted to thank the team for your time yesterday. In follow up to my action, I am trying to arrange a meeting for YNLRO to present the information shared, with our Federal Review Team members from Canadian Wildlife Service at ECCC, and a CNSC Environmental Risk Assessment Specialist.

I realize it would be lunch time in SK, but we are dealing on a couple different time zones. Could Thursday Aug 24th possibly work for you, at noon? If not, let me know and I will find another time.

Thanks,
Jes

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Wednesday, August 16, 2023 12:51 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>; Nickolet, Sydney <sydney.nickolet@cnscccsn.gc.ca>; Jessica.Way@cnscccsn.gc.ca
Cc: Megan Wallace <megan.wallace@yathinene.com>; Dana Kellett <dana.kellett@yathinene.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Subject: RE: EXTERNAL: RE: CNSC Procedural Review Discussion

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Jessica:

Thank you for this suggestion about bringing in others to talk about CNSC expectations for best practices. This would be most welcome. However, I would not like to rush such a technical discussion and therefore, I would suggest that this should be a follow up meeting to our meeting

To assist with the second meeting on CNSC expectations for best practices; I would like to take about 10 minutes of your time during our meeting to provide a presentation on our Cumulative Effects analysis project for the Wheeler River area as well as other areas of Nuhenene (i.e., Patterson Lake South area (the site of the NexGen and Fission proposed mines) and the regions around Points North Landing). I believe that this presentation would give you necessary context for what experts to invite to our follow up meeting.

Respectfully

Bruce Hanbidge, B.Sc [Bio], BSc [Biochem], MA [Ecol]
Operations Manager
Ya'thi Néné Land and Resource Office



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(C) 306-380-4457
(F) 306-802-4895
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From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Tuesday, August 15, 2023 7:37 AM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Nickolet, Sydney <sydney.nicolet@cnscccsn.gc.ca>; Jessica.Way@cnscccsn.gc.ca
Cc: Megan Wallace <megan.wallace@yathinene.com>; Dana Kellett <dana.kellett@yathinene.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Subject: EXTERNAL: RE: CNSC Procedural Review Discussion

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Hi Bruce!

I spoke with Sydney yesterday and she shared some of what you were looking to discuss tomorrow. I can speak to the CNSC process as it relates to CEAA 2012 and our expectations of Denison in this regard, but I understand there is also an interest in caribou and cumulative effects, which relates to research that YNLRO will be undertaking.

Feel free to call me at any point today at 343-540-6213, I am around until around 5:30 EST.

Thanks,
Jes

Jes Way, MEnv, PMP
(she / her / elle)

Environmental Review Officer | Agente en examen de l'environnement
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsc-ccsn.cg.ca | Tel: 343-540-6213

-----Original Appointment-----

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Monday, August 14, 2023 2:59 PM
To: Bruce Hanbidge; Way, Jessica; Nickolet, Sydney; Jessica.Way@cnsc-ccsn.cg.ca
Cc: Megan Wallace; Dana Kellett
Subject: CNSC Procedural Review Discussion
When: Wednesday, August 16, 2023 1:00 PM-1:30 PM (UTC-06:00) Saskatchewan.
Where: Saskatoon Teams Room

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

-----Original Appointment-----

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Monday, August 14, 2023 12:55 PM
To: Bruce Hanbidge; Nickolet, Sydney; Jessica.Way@cnsc-ccsn.cg.ca
Cc: Megan Wallace; Dana Kellett
Subject: CNSC Procedural Review Discussion
When: August 16, 2023 1:00 PM-1:30 PM (UTC-06:00) Saskatchewan.
Where: Saskatoon Teams Room

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From: [Way, Jessica](#)
To: [Wheeler River Project - Projet de Wheeler River](#)
[cheyenna.hunt@desnedhe.com](#); [nvp.mike@sasktel.net](#);
[wsmith@kineepik.ca](#); [bнатомagan@kineepik.ca](#); [glenmccallum@mns.work](#);
[blaroque@mns.work](#); [Shannon Landrie-Crossland](#); [rsmith@mns.work](#);
[sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#);
[garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#);
[dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#);
[kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#);
[csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#);
[claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#);
Bcc: [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#);
[robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#);
[conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#);
[douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#);
[receptionist@mltc.net](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#);
[bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#);
[tcooksearson@lrib.ca](#); [ty.roberts@lrib.ca](#); [ashley.carlson@lrib.ca](#);
[gchristiansen@lrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#);
[mellissa.winfield-lesk@hatch.com](#); [Heidi Klein](#); [Janna Switzer](#); [Carolanne Inglis-McQuay](#); [Steven Coupland](#); [Sorouche Mirmiran](#); [Bruce Hanbidge](#); [Yen. Wish](#); [Way, Jessica](#); [jenny.wolverine@erfn.net](#);
Subject: CNSC Wheeler River EA Update - Additional August 2023 Completeness Check and Next Phase of EIS Technical Review
Sent: 2023-08-31 5:48:00 PM

Hi Everyone,

This email is to provide another update on the Wheeler River Environmental Assessment (EA) Process.

On August 18, 2023, Denison Mines Corp. (Denison) re-submitted responses to information requests (IRs) for the proposed Wheeler River Environmental Impact Statement (EIS), to the Canadian Nuclear Safety Commission (CNSC). CNSC staff conducted a completeness check and determined that outstanding IRs have passed completeness and supporting submissions are sufficient to proceed to the next phase of EIS Technical Review. More information can be found in the [August 28, 2023 letter to Denison](#), and [completeness check table](#).

The 90-day technical review has since begun, and will conclude by November 27, 2023. The focus of this review will be the following documents, all posted to the Canadian Impact Assessment Registry:

- [Wheeler River Project: Denison's Responses to Information Requests from the Federal and Indigenous Review Team \(August 18, 2023\)](#)
- [Update to Indigenous Engagement Activities for the Wheeler River Project - draft EIS](#)

- [Wheeler River Project Commitments Table - draft EIS](#)

Please don't hesitate to let us know if you have any questions.

Sincerely,

Wheeler River Project Team

wheelerriver@cnsccsn.gc.ca

Environmental Review Division | Division de l'examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Yen, Wish](#); [Froess, Ryan](#); [Nickolet, Sydney](#); [Way, Jessica](#); [Gorzowski, Konrad](#); [Takala, Torin](#); [Kwamena, Nana-Owusua](#); [Burton, Patrick](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [wsmith@kineepik.ca](#); [bnatomagan@kineepik.ca](#); [georges@kineepik.ca](#); [glenmccallum@mns.work](#); [blarogue@mns.work](#); [slandriecrossland@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [karenbird@pbcn.ca](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [mellissa.winfield-lesk@hatch.com](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#);

Bcc:

Subject: Full Public and Indigenous Distro List

Sent: 2023-12-08 2:04:00 PM

To all participants of the Wheeler River regulatory review process,

CNSC staff will be providing regular updates to all those who have participated and/or expressed interest in the regulatory review process for the proposed Wheeler River Project, in the form of project bulletins.

Please find the Winter Project Bulletin (dated December 2023) attached to this email which will provide a brief update on the status of the project, as well as next steps. This will soon be posted to the CNSC website in the form of a "Feature Article", in both English and French.

Please ensure you are signed up to receive notifications and additional information regarding future correspondence from the CNSC: <http://www.nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/new-subscription.cfm>.

If you would prefer not to receive these updates, please reply to this email to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnsccsn.gc.ca

Web: [Wheeler River Project \(iaac-aEIC.gc.ca\)](http://WheelerRiverProject/iaac-aEIC.gc.ca).

Subject: FW: CEAA questions
Location: Microsoft Teams Meeting

Start: Mon 2024-02-12 4:15 PM
End: Mon 2024-02-12 4:45 PM
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Bruce Hanbidge

-----Original Appointment-----

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>

Sent: Saturday, February 10, 2024 9:41 AM

To: Bruce Hanbidge; Way, Jessica

Subject: CEAA questions

When: Monday, February 12, 2024 3:15 PM-3:45 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

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From: [Bruce Hanbidge](#)
To: [Way, Jessica; Froess, Ryan;](#)
Subject: RE: EXTERNAL: RE: request for clarification on the EIA guidelines
Sent: 2024-02-10 9:45:03 AM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

Jessica:

Thanks for this. I booked a Teams meeting time for 3:15 pm SK time, just to make sure that I don't run into a conflict with my prior 2-3pm meeting.

Thanks
Bruce Hanbidge
Strategic Advisor
Ya'thi Néné Land and Resource Office



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(C) 306-380-4457
(F) 306-802-4895
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From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Friday, February 9, 2024 4:35 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: EXTERNAL: RE: request for clarification on the EIA guidelines

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Hi Bruce,

I think this is a topic for me, as it falls under the EA umbrella. We can definitely discuss next week.

If Monday at 4pm EST (3pm SK time) works for you, we could have an initial chat to help to me to better understand exactly what your question is related to this clause. I may need to do some digging and then get back to you.

Let me know, and have a great weekend.

Thanks,
Jes

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Ryan:

I would like to speak to yourself, at your earliest convenience, and the Jessica if required, to clarify the requirement under CEAA (section 19(1)(a)) to restore and mitigate prior existing cumulative effects and residual effects.

Respectfully

Bruce Hanbidge
Strategic Advisor
Ya'thi Néné Land and Resource Office



(P) 306-477-1251
(C) 306-380-4457
(F) 306-802-4895
www.yathinene.ca

From: [Bruce Hanbidge](#)
To: [Beaton, Dana](#); [Pollock, Brady ENV](#); [Kwamena, Nana-Owusua](#);
Cc: [Way, Jessica](#); [Dereniowski, Jeff ENV](#); [Ken.Scott@gov.sk.ca](#); [Froess, Ryan](#); [Garrett Schmidt](#);
Subject: the environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan
Attachments: [YNLR Update Letter CNSCand SK MoE Regulators on generic process FINAL.pdf](#)
Sent: 2024-05-14 12:33:18 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

All:

The attached is for your information.

I am available at your convenience for further questions and/or clarifications. Please note that a meeting between YNLR and CNSC has already been scheduled, on 12 June 2024 for a discussion on the EIA process and licensing process in northern Saskatchewan.

Respectfully

Bruce Hanbidge
Strategic Advisor | Ya'thi Néné Land and Resource Office



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14 May 2024

Canadian Nuclear Safety Commission
Directorate of Environmental and Radiation Protection and Assessment
Dana Beaton, Director General
Dana.Beaton@cnscccsn.gc.ca

Canadian Nuclear Safety Commission
Environment Review Division
Nana Kwamena, Director
nana-owusua.kwamena@cnscccsn.gc.ca

Saskatchewan Ministry of Environment
Environmental Assessment and Stewardship
Brady Pollock, Executive Director
Email: brady.pollock@gov.sk.ca

Dear Ms. Beaton, Kwamena and Mr. Polluck:

Re: the environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan

YNLR thought it timely that we update government regulators on YNLR's understanding of federal and provincial environmental impact assessment legislation and process with respect to ongoing consultation and discussions with government and industry relating to the environmental impact assessment (EIA) process for proposed uranium mines in northern Saskatchewan. As you know, YNLR supports sustainable development in northern Saskatchewan, provided that it brings both social benefits and environmental protection. YNLR has recently reviewed three Environmental Impact Statements (EIS) and is commencing with the review of another EIS in the near future. To date YNLR has submitted numerous comments to regulators and companies as part of these three review processes. Of greatest concern to YNLR were four issues found in all of the initial three EISs reviewed:

- The nature of the consultation with YNLR
- Cumulative effects, especially on woodland caribou
- Water quality impacts and its associated fish health
- Environmental monitoring programs



1. The Nature of Consultation

While companies understand their obligations to indigenous people under duty to consult requirements, YNLR has requested all companies to refer to the Athabasca Denesuḡiné as ‘rights holders’ rather than project stakeholders. YNLR has noted that companies vary in their approach and level of understanding regarding this requirement and YNLR’s role in representing three Athabasca Denesuḡiné First Nations as their delegated authority. Furthermore, YNLR has requested companies to consider YNLR as a collaborative, active partner, rather than just a passive recipient of information. In other words, YNLR would like to be involved well before plans and programs are finalized, especially with respect to impact monitoring and follow-up. The response to YNLR has varied between companies but overall, to date, no company has responded to the extent of our request to be involved as a collaborative, active partner in the process of developing an EIS. All have treated YNLR as an interested party, to provide comments on a completed EIS, rather than involving us at the conceptual stage of developing an EIS.

2. Cumulative Effects on Woodland Caribou

Caribou are important to the Athabasca Denesuḡiné. YNLR has now reviewed the cumulative effects analyses submitted through the EIA process for three companies proposing to construct mines in northern Saskatchewan. All have to varying degrees conducted cumulative effects analysis for woodland caribou and concluded the effects were not significant, or minimally significant, and can be mitigated. YNLR questioned the methods and conclusions used by all three companies and conducted its own GIS-based analyses in accordance with accepted federal parameters¹²³⁴⁵. In each case the YNLR analyses revealed significant cumulative effects to varying degrees. The common thread in each company’s EIS was how the methodologies were structured to selectively exclude required factors in accordance with the federal parameters cited in this letter. Detailed descriptions of the concept and methodology used by YNLR are appended to this letter. Our results, using the appended methodology, have been shared with federal and provincial authorities, and the companies. However, all three companies have not resolved the difference in conclusion from the analyses and YNLR would like the regulators to record this divergence of opinion and to provide comment on our methodology. Furthermore, YNLR requests that the regulators include the requirement for a caribou habitat offset plan as part of the project approval process.

¹ Canadian Environmental Assessment Act, 2012

² Technical Guidance for Assessing Cumulative Environmental Effects under the Canadian Environmental Act, 2012, March 2018, Version 2

³ Operational Policy Statement: Assessing Cumulative Environmental Effects under the Canadian Environmental Act, 2012, Updated March 2015

⁴ Woodland Caribou, Boreal Population (*Rangifer tarandus caribou*): amended recovery strategy 2020

⁵ Agreement for the Conservation of the Woodland Caribou, Boreal population (Woodland Caribou) in Saskatchewan, 19 June 2019



Because of this, and the cultural importance of caribou to the Athabasca Denesutiné, YNLR is also requesting increased collaboration through our delegated authority status with companies and the government with respect to the conservation of this species, especially the ongoing discussions surrounding habitat offsets.

3. Water Quality and Fish Health

Clean, abundant water and the fish that it supports are another very important value of the Athabasca Denesutiné. All three of the initial EIS's reviewed state that water, in varying volumes up to very large volumes of water, will be extracted from the environment, used for mining processes, then released as treated effluent back into the environment. While the water will be treated and assurances made as to the ability of the receiving waters to dilute this without harming people or fish, there are residual fears among the Athabasca residents. Related to water quality, one company is planning the deployment of a relatively new technology to contain below ground mining chemicals behind a freeze wall. In the cases of two other companies; both of their proposed mines will be releasing the treated effluents into the same lake and watershed and one of these companies have noted that thresholds will be exceeded for some constituents. In each case, assurances have been made for adequate monitoring, but concerns remain as to the long-term impact on future generations. YNLR believes that the role of properly designed, transparent, statistically robust monitoring programs are therefore critical. These programs must involve local community participation and incorporate Traditional Knowledge. YNLR understands this and again, desires greater involvement in monitoring as part of a more collaborative partnership moving forward.

4. Monitoring Programs

In one of the initial three EISs reviewed, the proponent has provided a summary of monitoring and follow-up programs for their project, which YNLR has reviewed. While we realize that it is still early days, YNLR would like to emphasize that all monitoring programs should be transparent and statistically robust.

As a result, in the final monitoring designs, consideration should be given to their statistical power in order to minimize the likelihood of a Type 2 error, i.e. the possibility of not detecting an environmental change even when one occurs. YNLR would like this to be reflected in the government's project approval process and the appropriate mitigation measures incorporated into the project design.

The consequences of such errors can be serious and underpins YNLR's ongoing desire for increased collaboration with every company in the development and operation of such programs. Encouragingly, one company has indicated that while their monitoring program development is still in its early stages, they have invited input from YNLR: as to what will be the nature of the consultation, on that input, remains to be seen.



In conclusion, while YNLR will continue to work with all companies and looks forward to productive relationships that will provide mutual benefits to all parties: the resistance to use clear and transparent methodologies for cumulative effects assessment in accordance with accepted federal parameters, coupled with the resistance to consider YNLR as a collaborative, active partner, rather just than a passive recipient of information is not productive as the best way forward for the protection of lands and waters.

Respectfully,

Bruce Hanbidge
Strategic Advisor
Ya'thi Néné Land and Resource Office



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cc:

Garrett Schmidt, Exec Dir, Yathinene Lands and Resource Office
Jeff Dereniwski, Senior Environmental Assessment Administrator, Applications, SK MoE
Dr Ken Scott, Senior Environmental Assessment Administrator, Applications, SK MoE
Ryan Froess, Senior Advisor/Indigenous and Stakeholder Relations Division, Canadian Nuclear Safety Commission
Jessica Way, Environmental Assessment Officer, Canadian Nuclear Safety Commission

Appendix 1: A GIS based Method for Assessing Cumulative Environmental Effects within the Athabasca Basin of Nuhenéné



Appendix 1:

A GIS-based Method for Assessing Cumulative Environmental Effects Within the Athabasca Basin of Nuhenéné

Ya' thi Néné Lands and Resources (YNLR), Saskatoon

April 2024

YNLR Mission Statement

YNLR's mission is to protect the lands and waters of the Athabasca Basin for the long-term benefit of its Denesutiné 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 operate in the Athabasca Basin.

Background & Rationale

Northern Saskatchewan is experiencing an unprecedented boom in the exploration and development of its mineral resources, and in particular Uranium. While this activity clearly brings much-needed social and economic benefits, it also brings environmental and cultural challenges. YNLR, as the representative body of the Denesutiné First Nations and Athabasca communities has been engaging with both the mining industry and government as this process has unfolded. Such activities include the review of proposed mineral exploration programs and several environmental assessment statements for new mines, as well as negotiating agreements with the companies involved. YNLR supports this economic development but also requires that the lands and waters be protected from long-term harm for the benefit of the people.

One of the biggest challenges in this regard is the management of cumulative effects, in which the collective impacts of human development begin to significantly alter the natural dynamics of northern ecosystems. While governments have recognized this in their environmental reviews of industrial projects, it has become clear that some elements of northern ecosystems are still being adversely affected. Most notable among these is the woodland caribou, a species of high cultural and environmental value to the Denesutiné of the Athabasca Basin, and a species at risk nationally. Extensive scientific research has shown that this species is extremely sensitive to human disturbance, especially when it



results in increased wolf predation on the small groups of caribou dispersed throughout the forest. To better understand and manage this issue, YNLR has developed a cumulative effects model (CEM) that evaluates the availability of suitable habitat for the persistence of woodland caribou across the northern landscape.

YNLR Cumulative Effects Model (CEM)

- The model is a GIS-based, landscape level model, using the natural biophysical boundaries of (sub-) watersheds, or other arbitrarily chosen boundaries. It is therefore scalable to any watershed in the north, or to other boundaries as selected.
- The model estimates the combined, cumulative effects of natural (e.g. wildfire footprint) and human (e.g. industrial footprint) disturbances on woodland caribou habitat, which is considered a proxy for landscape ecological health.
- Woodland caribou are an ideal indicator of ecological health or resilience because of their large home range, which encompasses many other species and biophysical elements. They also rely on older lichen-rich forests. Maintaining a healthy caribou population therefore means that the surrounding forest is healthy too.
- The model assumes that a high cumulative impact footprint equates to a low ecological health or resilience outcome for woodland caribou persistence.
- The model employs coarse level data (e.g. fire history, habitats) not fine filter data such as species occurrences.
- The model uses remaining 'functional' woodland caribou habitat following natural and human disturbance as the primary measure of landscape ecological health or resilience.
- As such, the model is strongly aligned with other science-based woodland caribou assessments performed by academia and both the federal and provincial governments, including the recent Woodland Caribou National Recovery Plan (2020).

Methods

Several GIS data layers have been selected for inclusion in the digital model. They include an area boundary, forest types, wildfire history, and human disturbance:

- Watershed and sub-watershed boundaries and encompassed streams and lakes provided by Natural Resources Canada.



- Other relevant boundaries for the area under examination.
- Forest vegetation classes provided by Canvec, Government of Saskatchewan, and Natural Resources Canada.
- Annual forest fire polygons provided by the National Fire Database.
- Human disturbance polygons (permanent clearings, roads, trails, cut lines, etc.) provided by Canvec, Government of Saskatchewan, and Natural Resources Canada.

Forest vegetation classes are divided into preferred caribou habitat and non-preferred caribou habitat based on the Woodland Caribou National Recovery Plan (2020). The preferred habitat classes include Black Spruce Bog, Mature Black Spruce Forest, Mature Jack Pine Forest, and Open Muskegs. Other vegetation types and lakes are assumed to be non-preferred.

Annual forest fire polygons are divided into preferred caribou habitat and non-preferred caribou habitat based on the time elapsed since the burns. Polygons burnt under 40 years ago are classified as non-preferred caribou habitat (Woodland Caribou National Recovery Plan, 2020).

Human disturbance polygons are assumed to be non-preferred caribou habitat. They are also assigned a 500m buffer to reflect the indirect, ecological effects of the disturbances beyond their immediate boundaries (Woodland Caribou National Recovery Plan, 2020).

To calculate the amount of remaining functional woodland caribou habitat in the watershed or any given area, the area of lakes and streams, non-preferred caribou habitat types, forest burned less than 40 years ago, and the indirect, buffered human disturbance are subtracted from its total area. The resulting amount is then expressed as a percentage of the watershed or other area and compared to the percentage caribou habitat recovery goals in the Woodland Caribou National Recovery Plan (2020). For the SK1 woodland caribou management range, these amounts are no more than 65% combined human and naturally disturbed habitat, and no less than 35% undisturbed habitat to support the maintenance and recovery of the caribou populations present.

Model Example Analysis



To illustrate how the model works, a 100km radius area in northern Saskatchewan was selected (Figure 1), centered on Points North Landing (55.07N, 105.31W), a logistics hub 40 km west of Wollaston Lake. The total extent of the study area is 2,986,296 ha or about 29,863 km² (Table 1). To determine the amount of preferred habitat available to woodland caribou, the total area of burnt forest less than 40 years old was deducted, as was the total area of water. In addition, direct and indirect (500m buffer) human disturbance was also deducted. The remaining current extent of preferred habitat available for woodland caribou is therefore 918,284 ha or about 31% of the study area (Table 1).

Preferred Habitat	Area (ha)	%
Black Spruce Bog	290861	9.74%
Mature Black Spruce Forest	45273	1.52%
Mature Jack Pine Forest	446709	14.96%
Open Muskegs	135441	4.54%
TOTAL	918284	30.75%
Not Preferred Habitat		
All Other	1027785	34.42%
Disturbed	504187	16.88%
Water	536040	17.95%
TOTAL	2068012	69.25%

Table 1. Summary of Habitat Types Within the Points North Study Area

This result is less than the recommended federal woodland caribou combined habitat minimum of 35% for caribou range SK1, meaning that the long-term persistence of woodland caribou within the area is already at risk. Increased human disturbance combined with increased annual forest fires would further exacerbate this situation. The effects of any future human development within the study area should therefore be mitigated through a woodland caribou habitat offset program, such as extensive tree planting in areas and cut lines not properly recovering throughout the area. Furthermore,

new exploration projects should adopt a close-to-zero impact approach to activities that create lasting forest disturbance.

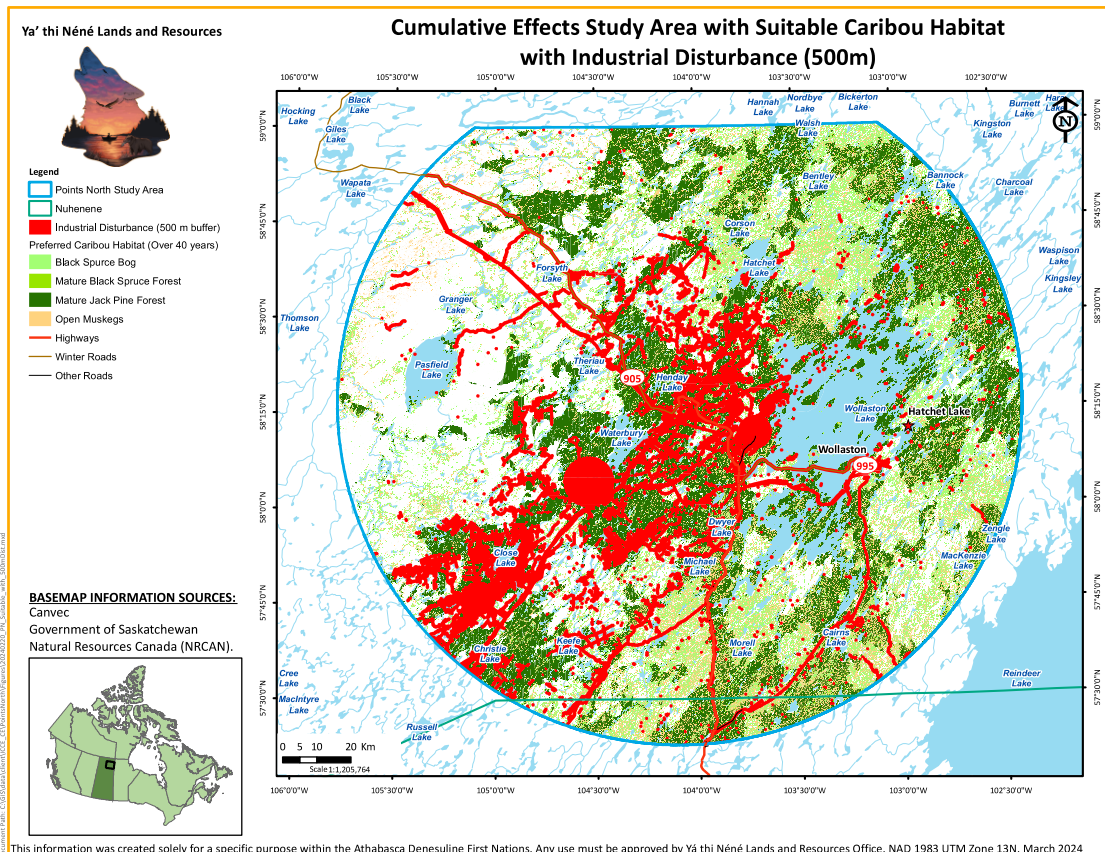


Figure 1. Results of cumulative effects analysis within 100km radius of Points North Landing, Saskatchewan; human direct and indirect (500m) disturbance is shown in red. Remaining preferred woodland caribou habitats (black spruce bog, mature black spruce forest, mature jack pine forest, open muskeg) following human and natural disturbances are also shown.

Potential Applications

Assuming that sufficient, essential woodland caribou habitat is a functional proxy for the ecological health of the boreal forest landscape, the CEM can potentially be deployed in at least several ways:



1. Within residual and cumulative effects assessments of new developments such as mines and roads.
2. Within mineral exploration programs that currently are not required to reforest cut lines and other resultant surface disturbance.
3. Within the designation and management of protected areas in the north.
4. When combined with spatial traditional knowledge and use data, the CEM can assess the risk of development to these important cultural values.
5. To inform and direct internal YNLR policies and approaches regarding land use management within Nuhenéné.
6. To inform government regulations, planning and land management policies throughout northern Saskatchewan.

Acknowledgements

YNLR acknowledges the Indigenous Centre for Cumulative Effects for providing funding towards the development of the Cumulative Effects Model. Its development was also greatly facilitated through discussions with staff from the Saskatchewan Ministry of Environment, the Canadian Nuclear Safety Commission, and Environment and Climate Change Canada.

From: [Froess, Ryan](#)
To: [Bruce Hanbidge](#)
Cc: [Way, Jessica](#)
Subject: Meeting with CNSC - Denison EIS meeting
Sent: 2024-05-15 12:20:22 PM

Hi Bruce,

Hope things are well and thanks for the letter the other day. Someone will be responding with a follow up and acknowledge that the letter was received from the CNSC but I wanted to make sure we did not have the wrong dates to meet in June first.

You said we had a planned meeting on Tuesday June 12 but Jessica and I had planned to meet on June 18th as she is in town this week. Hope that day will still work out? If so does the morning from 9-12 work better or afternoon 1- 4pm? Let me know and I can send out an invite and hold the time and we can discuss an agenda together with Jes in next few weeks.

Thanks,

Ryan Froess
Senior Advisor/Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission

Conseiller principal/Division des relations avec les Autochtones et les parties intéressées
Commission canadienne de sûreté nucléaire
ryan.froess@cnsccsn.gc.ca | Tél. Cell: 306-914-7892

From: [Bruce Hanbidge](#)
To: [Way, Jessica](#)
Cc: [Froess, Ryan](#); [Garrett Schmidt](#); [Katherine Hay](#);
Subject: RE: EXTERNAL: RE: meeting with CNSC Jessica and Ryan
Attachments: [Proposed agenda for the CNSC YNLR meeting of 18 June 2024.docx](#)
Sent: 2024-06-14 1:24:12 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE
DE PRUDENCE

Jessica:

Thank you for this draft agenda. To assist with meeting preparation: I have attached a revised agenda with a list of clarifying questions that I would like to ask before you provide the CNSC update on the YNLR cumulative effects methodology.

Respectfully

Bruce Hanbidge

Strategic Advisor | Ya'thi Néné Land and Resource Office



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From: Way, Jessica <jessica.way@cnscccsn.gc.ca>

Sent: Friday, June 14, 2024 10:17 AM

To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>

Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Garrett Schmidt <garrett.schmidt@yathinene.com>; Katherine Hay <katherine.hay@yathinene.com>

Subject: EXTERNAL: RE: meeting with CNSC Jessica and Ryan

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Hi Bruce,

I hope all is going well.

I know you probably have an agenda underway for next week's meeting, but Ryan and I were chatting this morning and wanted to provide a couple of proposed topics for your consideration:

- Update on status of the EA process
- Update from CNSC on YNLR Cumulative effects methodology
- Discussion on outstanding concerns from YNLR on the proposed Wheeler River Project

-----Original Appointment-----

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>

Sent: Wednesday, May 22, 2024 2:28 PM

To: Bruce Hanbidge; Froess, Ryan; Way, Jessica; Garrett Schmidt; Katherine Hay

Subject: meeting with CNSC Jessica and Ryan

When: Tuesday, June 18, 2024 1:00 PM-4:00 PM (UTC-06:00) Saskatchewan.

Where: Microsoft Teams Meeting

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Ryan and Jessica:

I am sending this teams meeting as a place marker for our in-person meeting in Saskatoon so that others can start to block out the time to attend.

I will have a draft agenda, by next week, for your consideration.

Respectfully

Bruce Hanbidge

Microsoft Teams [Need help?](#)

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Passcode: roSeoG

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Phone conference ID: 753 332 990#

For organizers: [Meeting options](#) | [Reset dial-in PIN](#)

Proposed agenda for the CNSC/YNLR meeting of 18 June 2024

Update on status of the EA process

- What are the timelines and steps until completion?
- Clarification on the application of **Technical Guidance for Assessing the Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012* (March 2018, Version 2)**
 - Is this the current version being used in the Denison Wheeler River EIA process?
 - Specific questions include:
 - How does CNSC consider existing residual impact on a site from prior human disturbances? (i.e., who is responsible for cleanup and restoration?)
 - How does CNSC consider a CE analysis that does, or does not, follow CNSC guidelines. Examples for which clarity is requested:
 - the application of buffers around linear disturbances (aka: cutlines);
 - the determination of spatial and temporal boundaries (the use of 1 or more of the 4 methodologies listed at ref¹)
- Clarification on the application of: **Operational Policy Statement: Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012* (Updated March 2015)**
 - Is this the current version being used in the Denison Wheeler River EIA process?
 - How does CNSC view the application of the iterative process for scoping cumulative environmental effects and how the following steps 1 to 5 are applied according to the Ref²
 - How does CNSC deal with a failure by the proponent to clearly identify their CE methodology see ref³
- Update from CNSC on YNLR Cumulative effects methodology
- Discussion on outstanding concerns from YNLR on the proposed Wheeler River Project
- Next steps and timelines for YNLR-CNSC related to the project

¹ Technical Guidance for Assessing the Cumulative Environmental Effects under the Canadian Environmental Assessment Act 2012,

² Step 1 to Step 5 of **Operational Policy Statement: Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012* (Updated March 2015)**

³ Step 2, para 1 of **Operational Policy Statement: Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012* (Updated March 2015)**

From: [Bruce Hanbidge](#)
To: [Way, Jessica](#); [Froess, Ryan](#); [Yen, Wish](#);
Cc: [Garrett Schmidt](#)
Subject: 16 July 2023 YNLR/CNSC meeting re: CE analysis and procedural clarifications
[Comments letter on Denison's response to YNLR concerns on draft EIS FINAL.pdf](#); [Proposed agenda for the CNSC YNLR meeting of 16 July 2024.docx](#);
Attachments:
Sent: 2024-06-19 6:17:27 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Dear Jessica and Ryan:

Thank you for the time you have taken for our meeting yesterday. It was informative for the subjects that we were able to discuss in depth.

I have attached our 02 Feb 2024 letter to Denison in which page 2 summarizes our cumulative effects (CE) analysis. The letter also includes a copy of the same CE disturbance map and summary of disturbance levels that we presented last year to both federal and provincial governments and their agencies. This attachment, in part, fulfills our commitment last year to send you written documentation in support of that CE presentation.

In preparation for our 16 July 2024 meeting; I suggest that we begin communications with the ECCC technical experts you indicated would be attending the meeting. I would like to ensure that we provide, in advance of that meeting, everything that these experts require to have a full and informed discussion concerning our CE methodology, analysis and conclusions. I also look forward to having the necessary experts attend the meeting to address our questions concerning the procedural aspects of how CNSC guidelines and policies, as detailed in the attached draft agenda, will be applied for the evaluation of Denison's Environmental Impact Statement and how these CNSC guidelines and policies will be applied to all other aspects of this Environmental Impact Assessment process for Denison's Wheeler River project.

I am available for further discussion at your convenience.

Respectfully

Bruce Hanbidge

Strategic Advisor | Ya'thi Néné Land and Resource Office



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Proposed agenda for the CNSC/YNLR meeting of 16 July 2024

1. Procedural clarifications for Guidelines and Policies
 - a. Clarification on the application of **Technical Guidance for Assessing the Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012 (March 2018, Version 2)***
 - Is this the current version being used in the Denison Wheeler River EIA process?
 - Specific questions include:
 - How does CNSC consider existing residual impact on a site from prior human disturbances? (i.e., who is responsible for cleanup and restoration?)
 - How does CNSC consider a CE analysis that does, or does not, follow CNSC guidelines. Examples for which clarity is requested:
 - the application of buffers around linear disturbances (aka: cutlines);
 - the determination of spatial and temporal boundaries (the use of 1 or more of the 4 methodologies listed at ref¹)
 - b. Clarification on the application of: **Operational Policy Statement: Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012 (Updated March 2015)***
 - Is this the current version being used in the Denison Wheeler River EIA process?
 - How does CNSC view the application of the iterative process for scoping cumulative environmental effects and how the following steps 1 to 5 are applied according to the Ref²
 - How does CNSC deal with a failure by the proponent to clearly identify their CE methodology see ref³
 - c. Clarification on the application of: **Considering Aboriginal traditional knowledge in environmental assessments conducted under the *Canadian Environmental Assessment Act, 2012 Updated: (March 2015)***
 - Is this the current version being used in the Denison Wheeler River EIA process?
 - What is the CNSC's current definition of Aboriginal traditional knowledge?
 - What is CNSC's current position on where ATK can be brought into EAs?
2. Discussion of the YNLR Cumulative effects study (references, methodology, analysis, and conclusions)

Specific questions from technical experts attending the meeting are requested by YNLR in advance of the meeting.
3. Other issues.

¹ Technical Guidance for Assessing the Cumulative Environmental Effects under the Canadian Environmental Assessment Act 2012,

² Step 1 to Step 5 of **Operational Policy Statement: Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012 (Updated March 2015)***

³ Step 2, para 1 of **Operational Policy Statement: Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012 (Updated March 2015)***

From: [Bruce Hanbidge](#)
To: [Way, Jessica](#)
Cc: [Garrett Schmidt](#); [Froess, Ryan](#); [Yen, Wish](#);
Subject: RE: EXTERNAL: RE: 16 July 2023 YNLR/CNSC meeting re: CE analysis and procedural clarifications
Sent: 2024-06-21 2:16:05 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Jessica:

I just wanted to confirm that everything we have sent is to be considered public. If there is anything that is to be considered confidential, we will indicate that in advance. Please feel free to share all information on your registry and with your technical and procedural people in preparation for our upcoming 16 July 2024 meeting.

I do expect and will appreciate any and all technical and procedural questions and clarifications in advance of the meeting to ensure maximum preparation in advance of the meeting.

Note: the date in the subject line has a typographical error:

Subject: EXTERNAL: RE: 16 July 2023 YNLR/CNSC meeting re: CE analysis and procedural clarifications

It should read 2024 not 2023

Respectfully

Bruce Hanbidge

Strategic Advisor | Ya'thi Néné Land and Resource Office



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From: Way, Jessica <jessica.way@cnscccsn.gc.ca>

Sent: Friday, June 21, 2024 10:45 AM

To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>

Subject: EXTERNAL: RE: 16 July 2023 YNLR/CNSC meeting re: CE analysis and procedural clarifications

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Bruce,

From: Way, Jessica
Sent: Thursday, June 20, 2024 6:08 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: RE: 16 July 2023 YNLR/CNSC meeting re: CE analysis and procedural clarifications

Hi Bruce,

Thanks for sharing the attached information. Thank you for your time as well, I thought it was a really productive discussion and we are looking forward to further discussing the other agenda items in our July meeting. We do also have some meeting minutes to come, but they are just under review.

In follow up to our meeting, I am reaching out to my ECCC counterparts regarding the information they are reviewing, as well as our Environmental Risk Assessment subject matter experts, to ensure that we will have the necessary team members available to discuss the information shared on YNLR's CE model and the questions raised in the draft agenda. I will update you as soon as I can on this.

Before I share the attached information, I wanted to ask if the letter you attached in the email below should be protected as confidential information. Attached is a confidentiality form that the CNSC uses to ensure protection of Indigenous Knowledge. This ensures that should a request come in for information that is subject to the *Access to Information Act*, this information is considered confidential and is clearly labelled as such. If there is also a need to protect the May 14th letter on the methodology, please provide a signed form for this submission as well.

If you decide you want to fill it out for either of these submissions, I'd ask that you specify that in addition to the CNSC, the information can be shared with Environment and Climate Change Canada, as well as the Canadian Wildlife Service. If it does not need to be protected, please just respond to this email and I will share with the team reviewing the methodology.

Sincerely,
Jes

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Wednesday, June 19, 2024 6:17 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Cc: Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: 16 July 2023 YNLR/CNSC meeting re: CE analysis and procedural clarifications

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

I have attached our 02 Feb 2024 letter to Denison in which page 2 summarizes our cumulative effects (CE) analysis. The letter also includes a copy of the same CE disturbance map and summary of disturbance levels that we presented last year to both federal and provincial governments and their agencies. This attachment, in part, fulfills our commitment last year to send you written documentation in support of that CE presentation.

In preparation for our 16 July 2024 meeting; I suggest that we begin communications with the ECCC technical experts you indicated would be attending the meeting. I would like to ensure that we provide, in advance of that meeting, everything that these experts require to have a full and informed discussion concerning our CE methodology, analysis and conclusions. I also look forward to having the necessary experts attend the meeting to address our questions concerning the procedural aspects of how CNSC guidelines and policies, as detailed in the attached draft agenda, will be applied for the evaluation of Denison's Environmental Impact Statement and how these CNSC guidelines and policies will be applied to all other aspects of this Environmental Impact Assessment process for Denison's Wheeler River project.

I am available for further discussion at your convenience.

Respectfully

Bruce Hanbidge

Strategic Advisor | Ya'thi Néné Land and Resource Office



T: 306-477-1251

M: 306-380-4457

E: bruce.hanbidge@yathinene.com

A: 100-335 Packham Ave., Saskatoon, SK S7N 4S1

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02 February 2024

Janna Switzer
VP Environment Sustainability and Regulatory
Denison Mines Corp.
345 4th Avenue South
Saskatoon, SK S7K 1N3

Phone: 306-652-8200
Email: jswitzer@denisonmines.com
www.denisonmines.com

Dear Janna:

Thank you for your letter of 23 November 2023 containing Denison's written responses to YNLR's concerns, as articulated in its intervention of Denison's draft environmental impact statement (EIS) for Wheeler River project. In general, your responses are a good start to addressing YNLR concerns and YNLR looks forward to ongoing discussions with Denison on this matter.

For context to this letter: YNLR acknowledges that we are currently in the iterative review stage of CNSC's environmental impact assessment (EIA) process for the Wheeler River project, where CNSC has identified those YNLR concerns that require further collaboration by Denison, with YNLR, to resolve in advance of the public review stage of the EIA process. We also note that CNSC further consolidated YNLR's EIS concerns into 45 issues, and YNLR has agreed to, at Denison's request in our initial meeting of 18 July 2023, to use CNSC's format for these 45 issues as the guide for further discussion. Additionally at that initial meeting, YNLR further requested that Denison's comments and responses to YNLR, for all communications relating to these issues, be in writing.

I will summarize YNLR's review of your November 2023 response in two parts starting with: 1) Denison's table of responses to YNLR's EIS concerns identified by CNSC; then, 2) Denison's technical memo on woodland caribou habitat, that was appended to Denison's response to YNLR's EIS concerns. As part of our response to the technical memo, YNLR is providing the results of its analysis of cumulative effects in the Wheeler River Watershed (attached as appendix 1).

I am looking forward to our scheduled 22 February 2024 meeting; I would like to discuss the agenda with you to allow for a discussion of caribou mitigation plans and offsets as a way forward for YNLR and Denison to mutually address cumulative effects and caribou management

1. YNLR EIS concerns

Most of Denison's responses to YNLR EIS concerns still do not adequately address our concerns. Specifically, YNLR has taken the position that it should be an active participant in the development of all components associated with the Wheeler River project. It is not acceptable to YNLR to be consulted after a plan and/or a process is already developed. We wish to be actively involved throughout any process on environmental, cultural and economic matters affecting Nuhenéné. We recognize that the YNLR Board of Directors, representing our communities, is actively involved in negotiations towards establishing an Impact Benefit Agreement for the Wheeler River project. In parallel with the

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requirements of the EIA process; we anticipate further resolution of YNLR's concerns, to be discussed and addressed through these negotiations.

2. Denison's technical memo on woodland caribou habitat

YNLR's conclusion differs from Denison's EIS regarding the environmental impacts to woodland caribou habitat and the level of cumulative effects (CE) currently existing in the Wheeler River watershed (that encompasses the Regional Study Area addressed in the EIS). This position is based on YNLR's own CE analysis of this watershed (see Appendix 1). The methodology used in this analysis is derived from the Federal Woodland Caribou Recovery Plan (2020), which has been accepted and endorsed by both provincial and federal governments. In further substantiation of the Federal Plan and its guidance;

- YNLR has presented its preliminary cumulative effects methodology to federal and provincial government agencies; who have supported both the methodology and results obtained by YNLR;
- industry support for woodland caribou and CE comes from NexGen's recent EIS submission for their proposed mine in Nuhenéné. This EIS, for a different area of Nuhenéné with similar levels of existing disturbance, concludes that CEs on woodland caribou are significant; and
- additional government support comes from Saskatchewan's Ministerial Decision accepting NexGen's EIS submission, including its position on woodland caribou and CE, and through its requirement for a caribou mitigation and offset plan

It is YNLR's position that our CE analysis is a reliable representation of the current caribou habitat status in the Wheeler River watershed. Simply stated, the level of human and natural disturbance in the watershed already exceeds the federal caribou conservation guidelines, and therefore any additional disturbance from Denison's project should be deemed 'significant'. We therefore believe that the way forward for Denison and YNLR is a discussion on caribou mitigation and offset plans and we look forward to discussing this topic at our 22 February meeting.

To conclude YNLR acknowledges, with respect and appreciation, Denison's foresightedness, courage, and progressive nature when it set the standard for the Saskatchewan mining industry by being the first corporation to sign an Exploration Agreement with YNLR that addressed the environmental, economic, and social realities of conducting exploration in Nuhenéné. However, we do not believe that the draft EIS adequately reflects Denison's progressive approach and look forward to further collaborative discussions with Denison to produce an EIS and subsequent process that reflects a mutually beneficial partnership for future development in Nuhenéné.

Respectfully



Bruce Hanbidge
Strategic Advisor
Ya'thi Néné Land and Resource Office

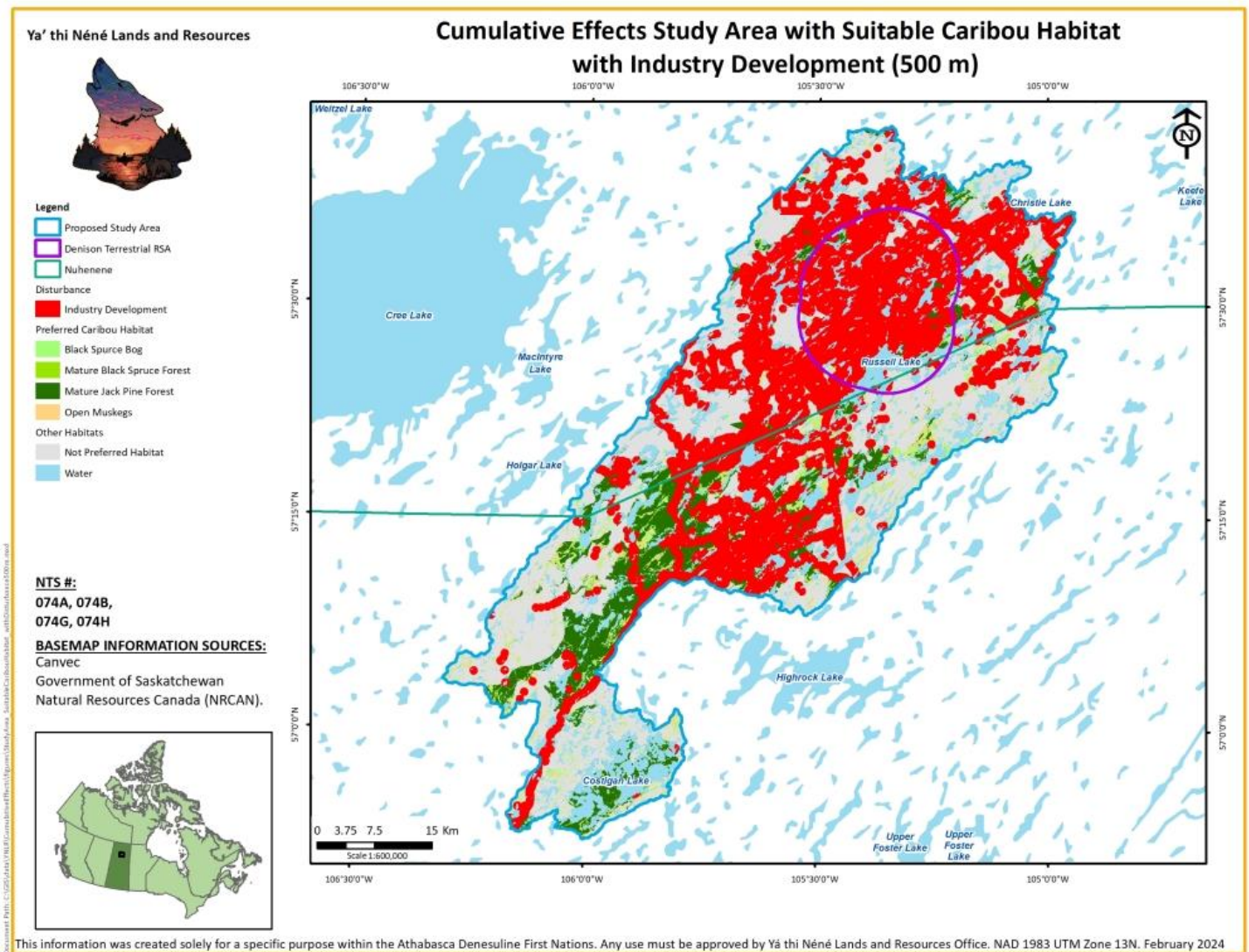
attachment: YNLR's July 2023 Cumulative Effects Study Area with Suitable Caribou Habitat with Industrial Disturbance (500m)

cc: Garrett Schimdt, Executive Director, YNLR

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Appendix 1:



Cumulative effects analysis of natural and human disturbance in the Wheeler River Watershed, which contains Denison's regional study area outlined in blue. All human disturbances are buffered by 500m as per Environment Canada guidelines. Red indicates unsuitable habitat for woodland caribou (81%); green indicates suitable habitat for woodland caribou (19%).

From: [Way, Jessica](#)
To: garrett.schmidt@yathinene.com (garrett.schmidt@yathinene.com); [Bruce Hanbidge](#); [Katherine Hay](#);
Cc: [McKeown, Justin](#); [Froess, Ryan](#); [Yen, Wish](#);
Bcc: [Way, Jessica](#)
Subject: 2024-06-18 - YNLRO-CNSC - Wheeler River Meeting Minutes
Sent: 2024-07-03 7:59:00 PM

Hi Garrett, Bruce, and Kathy,

Sorry for the delay on the sending of the minutes from our call at the end of June. I was hoping to confirm a couple of things before sending, but I will follow up on these after.

Thanks again for making time for us on the 18th – it was great to get to have an opportunity to provide an update on how things are progressing with the Wheeler River EA, and hear from YNLRO on the outstanding concerns with the project. We are looking forward to our next meeting.

Sincerely,
Jes

Ya'Thi Néné Lands and Resource Office/ YNLRO-CNSC Meeting Minutes – Denison Mines Wheeler River Project

June 18, 2024 1-4PM CST

Garrett Schmidt, Bruce Hanbidge, Katherine Hay, (CNSC staff) Ryan Froess, Justin McKeown, Jes Way and Wish Yen

Denison outreach on the Wheeler River project

- YNLRO has raised concern around the information gaps that remain from their community members to Denison's attention
 - Concern that the engagement has been with ERFN and KMLP more than YNLRO, and they are behind in understanding the proposed project
 - Community members have lots of questions around the ISR mining method as it's a new technology

Review of YNLRO's Letter – Cumulative Effects Methodology

- CNSC staff have shared the YNLRO cumulative effects methodology with Canadian Wildlife Services (CWS) as well as our Environmental Risk Assessment subject matter experts (SMEs)
- CNSC will compile the CWS and CNSC staff reviews of the YNLRO cumulative effects methodology and proposed having a dedicated discussion on this – CNSC can share comments in advance of a discussion with SMEs
- CNSC staff asked about the point in YNLRO's letter requesting that regulators record the divergence of opinion between YNLRO and the proponents' cumulative effects assessments, noting that for Wheeler, YNLRO have not shared any formal results for review, other than the preliminary presentation on methodology
- YNLRO will share the Wheeler River project specific information on YNLRO's evaluation of cumulative effects related to caribou for the purposes of discussion

Outstanding concerns from YNLRO

- The May letter highlighted the main outstanding concerns that YNLRO has on the proposed project:
 - The nature of consultation
 - YNLRO clarified that this is more of a historical issue, as YNLRO would have liked to have been engaged at the outset of the project, and have a role in how Denison planned to evaluate this project
 - Cumulative effects on woodland caribou (further discussion below)
 - Water quality and fish health:
 - Brief discussion on REGDOC 2.9.2 recently being released – CNSC committed to sharing this new REGDOC:
 - <https://www.nuclearsafety.gc.ca/eng/acts-and-regulations/regulatory-documents/history/regdoc2-9-2/>
 - Monitoring programs:
 - Access to data – YNLRO is concerned about maintaining data and transparency. CNSC committed to sharing links to Open Government, where our IEMP data and many other data repositories, including our Environmental Protection Review Reports, are being maintained:
 - General Page: [Open Government | Open Government - Government of Canada](#)
 - Porter Search: [Open Government Portal \(canada.ca\)](#)

Cumulative Effects

- With regards to the questions shared in the proposed Agenda, CNSC is not prescriptive in how proponents conduct cumulative effects assessments for CEAA 2012 EAs, as long as the guidance is followed (various methodologies would be acceptable)
 - CNSC will not be comparing the proponent and YNLRO cumulative effects methodologies and making a determination on which is more appropriate. Rather, CNSC will take into consideration contradictions in the methodologies and conclusions, and can reflect the views expressed by YNLRO in our EA Report
 - YNLRO noted that using their methodology, which follows the caribou recovery plan, the results have orders of magnitudes of difference with Denison's conclusions
 - YNLRO is concerned that in the revised draft EIS submitted by Denison, they have removed the cumulative effects methodology that was in the first draft of the EIS
 - CNSC indicated that removal of this information from the revised version of the EIS is concerning, and will have to look to better understand which information has been removed (no information should be removed or revised, if it wasn't the subject of an Information Request (IR))
 - The focus of SME reviews at this stage of the EIS technical review is on responses to IRs that are outstanding, and information that has already been reviewed and evaluated is not re-reviewed
 - YNLRO is requesting the specifics of the Denison's methodology, including data.
 - YNLRO has asked for this information from Denison, but has not received it to date
 - Denison stretches the cumulative effects analysis to all of Northern SK which isn't sound methodology
 - Eg. Linear disturbance – YNLRO applies the 500m buffer and Denison only applied it for the RSA
- YNLRO is also concerned by the lack of a fulsome cumulative effects analysis which incorporates the impacts of exploration, and reasonably foreseeable projects such as the project adjacent Cree Lake with significant cut lines

EA Update and Next Steps

- CNSC anticipates closing out the technical review in the next few weeks and may be going to final EIS by the end of summer

- CNSC has been working on compiling the Issues and concerns raised by YNLRO and this will be shared for review in the coming weeks/months
- Specific questions related to CNSC guidance on CEAA 2012 projects
 - Who's responsible for cleaning up pre-existing residual effects on the site? (YNLRO wants confirmation from CNSC that the proponent is responsible)
 - If there are effects evaluated through the EA process that result in residual effects (cumulative effects or otherwise), a proponent is responsible for these effects
 - How do you consider the cumulative effects analysis whether it follows CNSC expectations and CEAA guidance?
 - CNSC SMEs will be invited to share how they conduct their evaluations of a proponent's assessment process - to be discussed at July meeting
 - According to the CEAA CE Policy Statement – how does CNSC deal with failure by a proponent to clearly identify their methodology?
 - CNSC indicated that this is something that we evaluated through the EIS technical review process. Information Requests (IRs) were made related to Denison's cumulative effects assessment, and there are IRs that have resolved.
- In addition to meeting in July on cumulative effects and YNLRO's methodology, ideally we would meet more regularly to ensure that we are discussing outstanding concerns that YNLRO has, as well as progressing the work discussed in the presentation (Issues and concerns, and YNLRO reviews of how YNLRO information has been incorporated into the EA report and RIA)

Action Items

- YNLRO will be sharing Denison specific information on cumulative effects with CNSC the week of June 24-28 (**Complete**)
- CNSC will invite the appropriate SMEs to a technical discussion on cumulative effects methodologies reviewed by CWS and CNSC staff (Currently planned for July 16th) (in Progress)
- CNSC to share links related to REGDOC 2.9.2 and Open Data (**Complete, see above**)



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Canada

Wheeler River Project Engagement Ya'thi Néné Lands and Resources

Jes Way, Ryan Froess



nuclearsafety.gc.ca



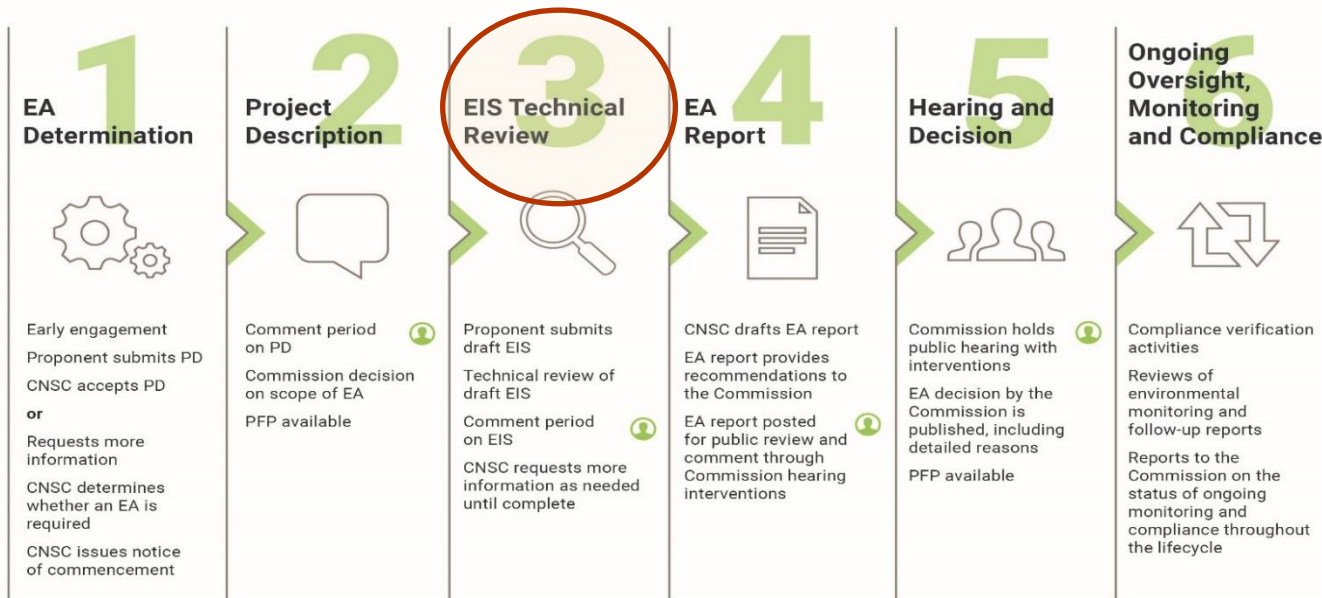
Wheeler River Project – Update

Canadian Nuclear Safety Commission Environmental Assessment Process under the *Canadian Environmental Assessment Act*, 2012

Ongoing public engagement
and Indigenous consultation
throughout the EA process

Current phase of EIS
technical review was
expected to end on
May 20th, 2024

Currently Delayed



Legend

EA: Environmental Assessment
PD: Project Description

EIS: Environmental Impact Statement
PFP: Participant Funding Program

: Formal Participation Opportunity

EA Steps Diagram

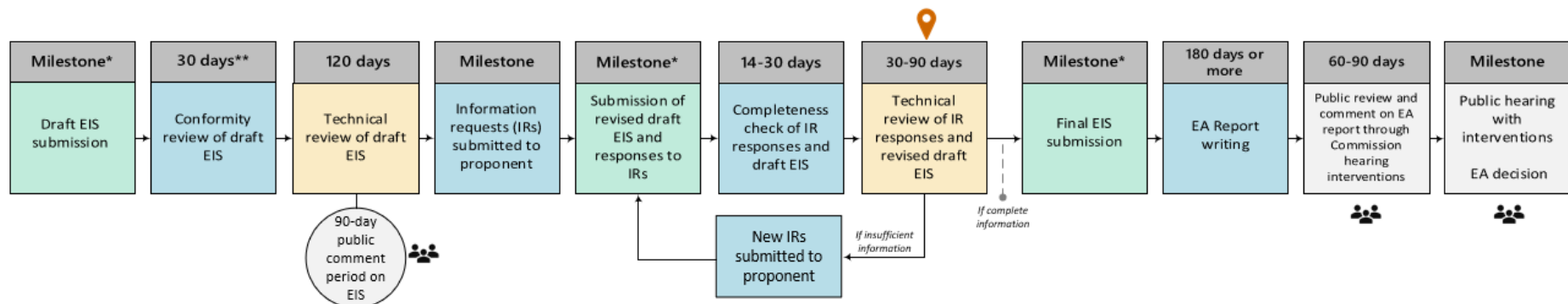
DETAILED ENVIRONMENTAL ASSESSMENT PROCESS UNDER THE CANADIAN ENVIRONMENTAL ASSESSMENT ACT, 2012

- FROM THE DRAFT EIS SUBMISSION UNTIL THE EA DECISION -



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EIS TECHNICAL REVIEW
PHASE

EA REPORT
PHASE

HEARING AND
DECISION PHASE

Ongoing Indigenous consultation and engagement throughout the EA process

LEGEND

FPIRT task

CNSC staff task

Proponent task

Milestone or
duration of task

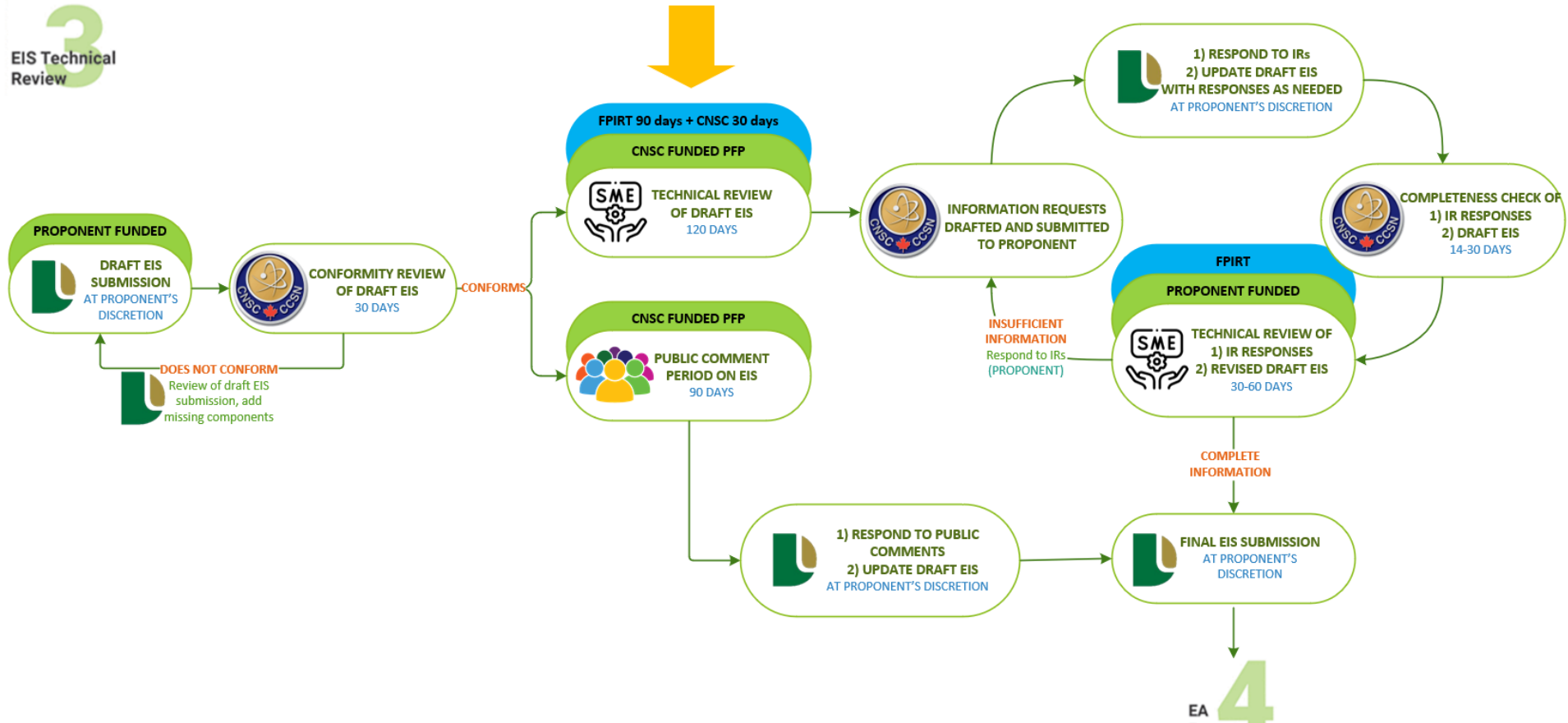


Public and Indigenous
comment period

* Proponent led milestones are at the discretion of the proponent and have no specific timeline associated with the task.

** Duration is in calendar days for all steps of the process.

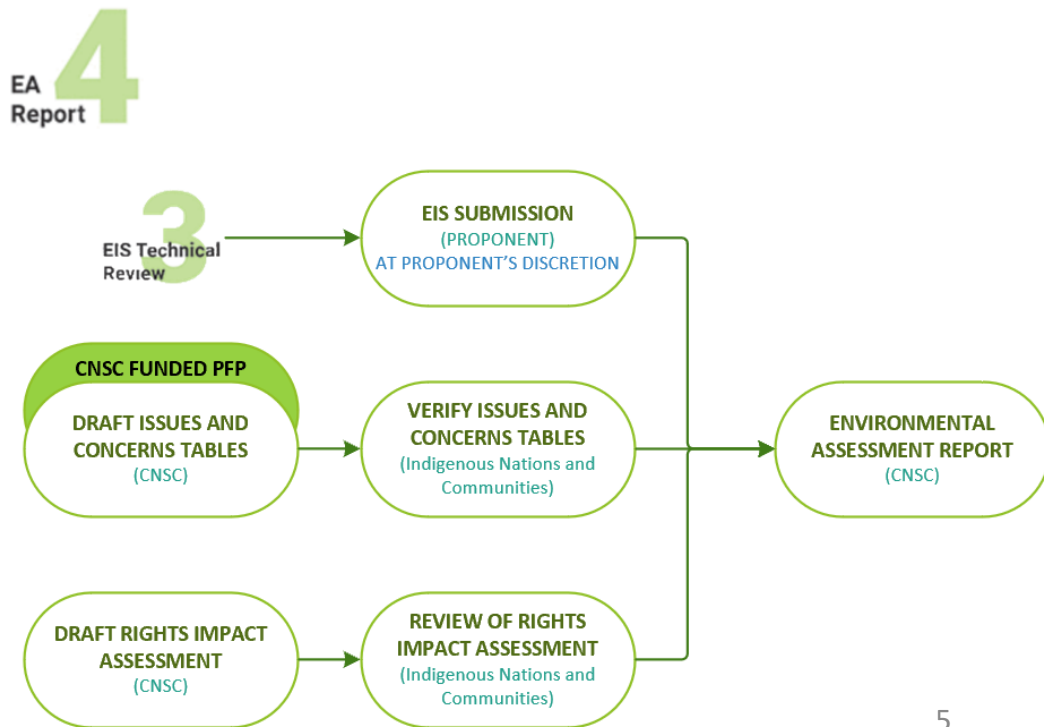
Current EIS Review Phase





EA Process – Next Steps & EA Report Phase

- Regular correspondence and meetings to collaborate and share project updates
- Review Issues and Concerns Tables drafted by CNSC
- Review Rights Impact Assessment report drafted by CNSC





Issues and Concerns Tables

- Summary record of all issues and concerns raised by YNLRO throughout the EA process
- Compiled by CNSC staff from engagement with the YNLRO
 - This will be an ongoing engagement activity which will continue until the Final CNSC EA Report is drafted
- To be reviewed and validated by the YNLRO



Rights Impact Assessment - Objectives

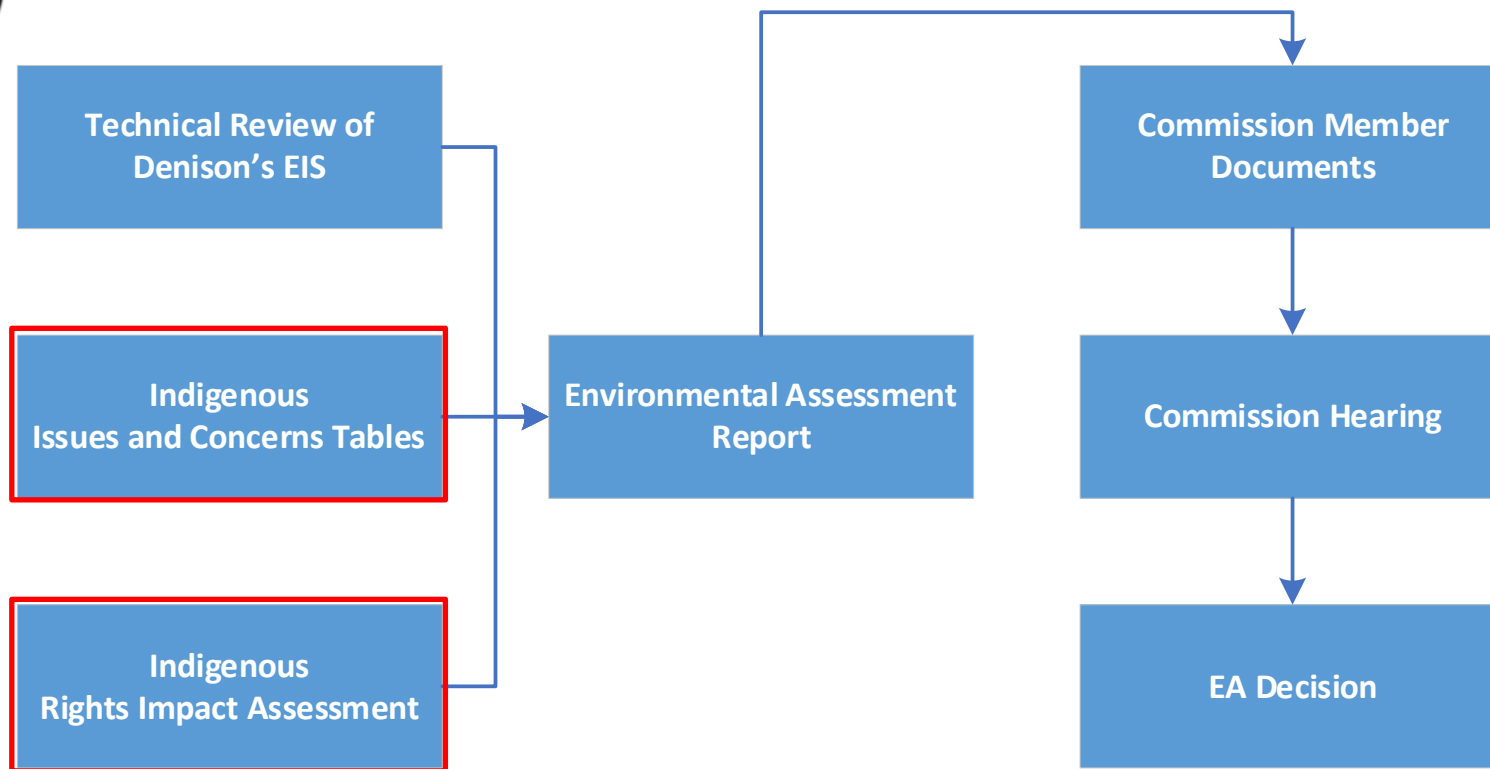
- RIAs helps fulfill the duty to consult under s. 35 of the Constitution Act for projects undergoing EA and/or licensing processes led by the CNSC

Objectives:

- take into account all the potential impacts on Indigenous and/or Treaty rights
- provide clear and complete information and analysis regarding potential impacts on rights with regards to inform the Commission's decision on the EA



Outputs of the EA process





What Denison says: EIS conclusions

- Based on the results of the environmental assessment, including implementing mitigation measures, along with proposals for follow-up and monitoring, **the proponent does NOT expect the Project to cause significant adverse environmental effects**, including effects from accidents and malfunctions, effects of the environment on the Project and cumulative effects.

- Physical and biological environment

- Geology and groundwater
- Surface water
- Fish and fish habitat
- Sediment quality and benthic invertebrates
- Terrain, soil and organic matter/peat
- Vegetation
- Raptors and migratory birds
- Wildlife and wildlife habitat
- Species at risk

- Atmospheric Environment

- Air quality
- Noise
- Greenhouse gas (GHG) emissions

- Human Environment

- Human health
- Land use
- Impacts to Treaty Rights

- Other factors

- Accidents and malfunctions
- Cumulative effects



Ya'thi Néné Lands and Resources Office

What Denison says about use and practices:

- Hatchet Lake, Black Lake and Fond du Lac
- Hunting & Trapping:
 - Barren-ground caribou herds (Beverly and Qamanirjuaq)
 - Moose, black bear and waterfowl
- Fishing:
 - Fish camps for Lake Whitefish, Lake Trout, Walleye, Northern Pike, Arctic Grayling and suckers
- Gathering:
 - Wood for heating fuel, medicinal, ceremonial and spiritual uses
 - Berry picking during the summer
 - Plant gathering
 - Duck eggs in spring
- Other Cultural Uses:
 - Therapeutic purposes
 - Youth gatherings
 - General camping



Discussion on YNLRO's Outstanding Concerns

- The nature of consultation
- Cumulative effects on woodland caribou
- Water quality and fish health
- Monitoring programs



Canadian Nuclear
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Questions?

Thank You!

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Contact us

Environmental Protection Operations Directorate
Prairie & Northern Region
9250 49 Street
Edmonton, AB T6B1K5



June 14, 2024

via email at: jessica.way@cnscccsn.gc.ca

Jessica Way
Environmental Assessment Officer
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

Dear Jessica,

RE: The environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan

Environment and Climate Change Canada (ECCC) has reviewed the Ya'thi Néné Lands and Resource Office (YNLRO) report "A GIS-based Method for Assessing Cumulative Environmental Effects Within the Athabasca Basin of Nuhenéné", April 2024 and associated Cumulative Effects Model (CEM) shared on the 27th of May 2024 requesting ECCC perspective/feedback. ECCC acknowledges the amount of hard work that went into this and is providing the following suggestions to improve the clarity of the methods document for the CEM and its alignment with the Recovery Strategy for the Woodland Caribou (*Rangifer tarandus caribou*), Boreal population, in Canada (Environment and Climate Change Canada, 2020).¹

Please note that this review does not necessarily constitute an approval or endorsement of the model by ECCC at this stage.

ECCC Comment	Suggested additions to CEM methodology document
The CEM uses 'preferred' and 'non-preferred' habitat which is somewhat different than the Recovery Strategy which generally refers to 'disturbed habitat', 'undisturbed habitat', and 'biophysical attributes.'	Explain how CEM terminology corresponds or differs from the Recovery Strategy terminology.
The methodology describes that the human disturbance polygons are assumed to be non-preferred caribou habitat.	Explain if there has been any validation of caribou use within the human disturbance polygons.

¹ [Environment and Climate Change Canada, 2020. Amended Recovery Strategy for the Woodland Caribou \(*Rangifer tarandus caribou*\), Boreal Population, in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada, Ottawa. xiii + 143pp.](#)

ECCC Comment	Suggested additions to CEM methodology document
<p>In their definition of preferred habitats, based on land classification data, the CEM methods may underestimate the habitat types used by Boreal Caribou (BOCA). Of note:</p> <ul style="list-style-type: none"> • Appendix H in the Recovery Strategy provides a list of biophysical features that contribute to critical habitat for caribou, while Table H-4a provides biophysical attributes for the Boreal Shield West ecoregion and includes multiple types of habitats including broad scale habitat, calving, post-calving, rutting, winter, and travel habitat. • The CEM identified “preferred habitat” as black spruce bog, mature black spruce forest, mature jack pine forest and open muskegs. • It is unclear if biophysical attributes for the Boreal Shield West Ecoregion such as young jack pine, open riparian habitats, mixed forests, sparsely treed rock, and lakeshores are captured in the “preferred habitat” forest classes. 	<p>More information is needed regarding how the biophysical attributes in the 2020 Amended Recovery Strategy were used in the CEM to classify vegetation types, and if they were captured in the “preferred habitat” category. Clarification is needed to understand if the model provides output for each of these types of habitats (calving, winter, etc.), or are all types combined.</p>
<p>More detail on the methods and data listed on pages 6-7 of the CEM document are needed so that readers can fully understand how the CEM was created. Ideally, enough detail should be provided so that a reader could replicate the CEM and its output, if desired.</p>	<p>Provide additional detail on methods including:</p> <ul style="list-style-type: none"> • Full citations for each GIS layer • How forest age was considered in the model • How overlapping disturbances are dealt with in the model, such as when a road and its buffer intersect a burned area.
<p>It is not clear how the area calculations are performed by the CEM for the Model Example Analysis. The example provided uses a 100-km radius circle which should have an area of 3,141,592 ha ($\pi \times r^2$), however an area of 2,986,296 ha total is reported as the total extent (a difference of 155,296 ha). Is it possible that some areas within the circle were excluded prior to the habitat analysis calculations?</p>	<p>Provide additional information on areas that are excluded from the calculations.</p>
<p>Critical habitat in the SK1 range is defined in the Recovery Strategy as: (1) a perpetual state of 40% undisturbed habitat, and (2) biophysical attributes as defined in Appendix H. The CEM appears to refer to the 65/35 threshold that is used in other ranges such as SK2.</p>	<p>Correct information on disturbance thresholds for SK1 range.</p>
<p>The disturbance thresholds listed in the recovery strategy are meant to be applied to the level of the range. The CEM is applied at different scales (i.e. watershed, 100-km radius from a point or another landscape level area) other than the range. The modeled areas may fall into different caribou ranges, which would result in the study area having two different disturbance thresholds (e.g. 40% undisturbed in SK1 and 65% undisturbed in SK2).</p>	<p>Provide additional information on how the model works if the study area is across ranges that have different disturbance thresholds (e.g. SK1 and SK2).</p>

Should you require further information, please contact Marcus Edino at Marcus.Edino@ec.gc.ca or Heather Konopski at Heather.konopski@ec.gc.ca.

Sincerely,

Corinna Watt
A/Regional Director, Environmental Protection and Operations Directorate
Prairie Northern Region

cc: Gayle Hatchard, A/Head, EA South, EPOD, ECCC
Heather Konopski, Environmental Assessment Officer, EA PNR-South, ECCC



Environment and
Climate Change Canada

Environnement et
Changement climatique Canada

Canada

From: [Bruce Hanbidge](#)
To: [Yen, Wish](#)
Cc: [Marcus.Edino@ec.gc.ca](#); [Paul James](#); [Dennis Sherratt](#); [Way, Jessica](#);
Subject: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model
Attachments: [YNLR response to ECCC feedback on CE model.docx](#); [19062024_ECCC_Suggestions_on_YNLRO_Cumulative_Effects_Model.pdf](#);
Sent: 2024-07-12 1:20:37 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Dear Yen:

Thank you for the feedback from ECCC. I have reviewed and commented on it. Those comments are attached for your and ECCC's review to assist with the preparations for our upcoming meeting.

Respectfully

Bruce Hanbidge

Strategic Advisor | Ya'thi Néné Land and Resource Office



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From: Yen, Wish <wish.yen@cnsccsn.gc.ca>

Sent: Tuesday, July 9, 2024 1:47 PM

To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>

Cc: Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Way, Jessica <jessica.way@cnsccsn.gc.ca>

Subject: EXTERNAL: ECCC feedback on the Cumulative Effects Model

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Bruce,

Please find the feedback and suggestions from ECCC attached for your team's consideration prior to our meeting next week.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnsccsn.gc.ca | 343.553.2233



Government
of Canada

Gouvernement
du Canada

YNLR responses to topics and questions in the ECCC letter dated 14 June 2024

Topic #	ECCC Comment	Suggested additions to CEM methodology document	YNLR response to suggested additions
1.	The CEM uses 'preferred' and 'non-preferred' habitat which is somewhat different than the Recovery Strategy which generally refers to 'disturbed habitat', 'Undisturbed habitat', and 'biophysical attributes.'	Explain how CEM terminology corresponds or differs from the Recovery Strategy terminology.	<p>The definitions of 'preferred' and 'non-preferred' habitat are different than the definitions of 'disturbed' and 'Undisturbed habitat', and 'biophysical attributes.'</p> <p>CEM 'preferred' and 'non-preferred' habitat definitions are consistent with <i>Section 7 Critical Habitat</i> of the Recovery Strategy, and the work of Dr. P.D. McLoughlin who is cited in Section 7. The CEM used the habitat suitability map developed by Dr. McLoughlin's Grad student in accordance with Section 7</p> <p>Please refer to Section 4.2.1 of the Recovery Strategy for the definitions of disturbed and undisturbed habitat</p>
2.	The methodology describes that the human disturbance polygons are assumed to be nonpreferred caribou habitat.	Explain if there has been any validation of caribou use within the human disturbance polygons.	The CEM is a landscape level GIS analysis based on the Recovery Strategy; hence validation of caribou use within human disturbance polygons is outside of the scope of the Recovery Strategy. If the reviewer is suggesting that caribou use within human disturbance polygons is a factor under consideration in CNSC's EIA process, then this should be addressed in the procedural questions within the proposed agenda.
3.	<p>In their definition of preferred habitats, based on land classification data, the CEM methods may underestimate the habitat types used by Boreal Caribou (BOCA). Of note:</p> <p>☐ Appendix H in the Recovery Strategy provides a list of biophysical features that contribute to critical habitat for caribou, while Table H-4a provides biophysical attributes for the Boreal Shield West ecoregion and includes multiple types of habitats including broad scale habitat, calving, post-calving, rutting, winter, and travel habitat.</p> <p>☐ The CEM identified "preferred habitat" as black spruce bog, mature black spruce forest, mature jack pine forest and open muskegs.</p> <p>☐ It is unclear if biophysical attributes for the Boreal Shield West Ecoregion such as young jack pine, open riparian habitats, mixed forests, sparsely treed rock, and lakeshores are captured in the "preferred habitat" forest classes.</p>	More information is needed regarding how the biophysical attributes in the 2020 Amended Recovery Strategy were used in the CEM to classify vegetation types, and if they were captured in the "preferred habitat" category. Clarification is needed to understand if the model provides output for each of these types of habitats (calving, winter, etc.), or are all types combined.	The CEM used the preferred habitats data overlay developed in the Stewart thesis. A copy of this thesis is attached for your review
4.	More detail on the methods and data listed on pages 6-7 of the CEM document are needed so that readers can fully understand how the CEM was created. Ideally, enough detail should be provided so that a	Provide additional detail on methods including:	See the following detailed response

YNLR responses to topics and questions in the ECCC letter dated 14 June 2024

	reader could replicate the CEM and its output, if desired.	<ul style="list-style-type: none"> ☑ Full citations for each GIS layer ☑ How forest age was considered in the model ☑ How overlapping disturbances are dealt with in the model, such as when a road and its buffer intersect a burned area. 	
5.	<p>It is not clear how the area calculations are performed by the CEM for the Model Example Analysis. The example provided uses a 100-km radius circle which should have an area of 3,141,592 ha ($\pi \times r^2$), however an area of 2,986,296 ha total is reported as the total extent (a difference of 155,296 ha). Is it possible that some areas within the circle were excluded prior to the habitat analysis calculations?</p> <p>Provide additional information on areas that are excluded from the calculations.</p>	Provide additional information on areas that are excluded from the calculations.	The total area of preferred/not preferred habitats within the 100 km circle around Points North is the area used for analysis and it is correct (2,986,296 ha). The reason for this is that the preferred habitat map that we used did not quite cover the full area of the circle. This will be more clearly defined in future uses of this study.
6.	Critical habitat in the SK1 range is defined in the Recovery Strategy as: (1) a perpetual state of 40% undisturbed habitat, and (2) biophysical attributes as defined in Appendix H. The CEM appears to refer to the 65/35 threshold that is used in other ranges such as SK2.	Correct information on disturbance thresholds for SK1 range.	Noted, with appreciation
7.	The disturbance thresholds listed in the recovery strategy are meant to be applied to the level of the range. The CEM is applied at different scales (i.e. watershed, 100-km radius from a point or another landscape level area) other than the range. The modeled areas may fall into different caribou ranges, which would result in the study area having two different disturbance thresholds (e.g. 40% undisturbed in SK1 and 65% undisturbed in SK2).	Provide additional information on how the model works if the study area is across ranges that have different disturbance thresholds (e.g. SK1 and SK2).	This is an issue of spatial and temporal scale and how it is interpreted. The CEM selected a methodology guided by CNSC policies and technical guidance (i.e., ecosystem-centered spatial boundaries methodology and policies stating that spatial and temporal boundaries need to encompass the potential environmental effects on the selected VC). How the model output will be interpreted requires the CNSC to clarify how they are applying their policy and technical guidance to the interpretation of Denison's and YNLR's model analyses. This interpretation is a key question that YNLR has requested from CNSC so as to enable us to address your [ECCC's] within the parameters of the EIA process.

Detailed response to topic 4:

GIS Citations for each layer

Vegetation layer: University of Saskatchewan bs_veg-map_2016_v0.3. Vegetation classification dataset from 2016 that was provided by the Northern Plant Ecology Lab (via

Phil McLoughlin at the biology department at the U of S. Stewart thesis pg 54 “Habitat classes were derived from an updated forestry ecosite class (FEC) layer provided by Dr. Kunwar Singh and his colleagues in the University of Saskatchewan’s Northern Plant Ecology Lab (NPEL)”.

Fire Data: acquired from Saskatchewan Public Safety Agency via data request. Compiled in GIS. Later burn boundaries overruled earlier boundaries (ex. 2014 burn overlapped with a 2020 burn becomes 2020 burn).

Disturbance data:

Human Footprint Layer: Saskatchewan Human Footprint Spatial Data Product. Developed by Cumulative Impacts and Science Branch, Ministry of Environment. V. 1.0. Created June 2020.

Canvec: WMS accessed to pull any anthropogenic data.

Track_structure_0

Track_marker_post_0

Track_junction_0

Track_crossing_0

Toll_point_0

Runway_0

Road_junction_0

Railway_station_0

Navigational_aid_0

Nautical_facility_0

Marina_0

Blocked_passage_0

Wind_operated_device_0

Valve_0

Transformer_station_0

Petroleum_well_0

Ore_0

Oil_gas_site_0

Tower_0

Tank_0

Ritual_cultural_area_0

Protection_structure_0

Liquid_storage_facility_0

Leisure_area_0

Landmark_feature_0

Dam_0

Commercial_institution_area_0

Chimney_0

Building_0

Trail_1

Track_structure_1

Track_segment_1

Road_segment_1

Road_ferry_1

Rail_ferry_1

Nautical_facility_1

Footbridge_1
Aerial_cableway_1
Power_line_1
Pipeline_1
Communication_line_1
Sewage_pipeline_1
Protection_structure_1
Leisure_area_1
Landmark_feature_1
Delimiting_structure_1
Dam_1
Conduit_bidge)1
Cut_line_1
Runway_2
Nautical_facility_2
Transformer_station_2
Peat_2
Ore_2
Oil_gas_site_2
Aggregate_2
Waste_2
Tank_2
Ritual_cultural_area_2
Residential_area_2
Protection_structure_2
Liquid_storage_facility_2
Leisure_area_2
Landmark_feature_2
Dam_2
Commercial_institution_area_2
Building_2

Saskatchewan Rest Services:

Roadseg
Mine_locations
Mineral_deposit_index
drillholes

YNLR Proprietary Information

Digitized linear disturbances

Cabin locations

Linear and point disturbances provided by mining industry proponents

The analysis was stacking the layers.

1. Begin with veg data layer

2. Union in cleaned fire dataset. Populate new attribute field based on year of burn. Classify new attribute veg type as mature (no burn or $40 \geq$ years), young/mid-successional (≤ 40). Add in preferred habitat (Y/N) attribute.
3. Create clean disturbance dataset, buffer by 500m. Clip into veg dataset. All veg data underneath the 500m buffer of the anthropogenic disturbance is now classified as disturbed. Anthropogenic Disturbance is the top layer as we do not have “age” associated with most anthropogenic disturbance, so we are unable to determine if the burn happened before or after.

ERAD Review of YNLR GIS-based Method for Assessing Cumulative Environmental Effects

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DERPA TECHNICAL REVIEW

Security Classification: Unclassified

Technical Review Information

Source Document Title: Re: the environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan		
Safety and Control Area: Environmental protection	Specific Area: Environmental risk assessment	Review Topic: <ul style="list-style-type: none">• Environmental assessment• Cumulative effects assessment
Review Scope and Purpose: <p>CNSC has received a letter titled “Re: the environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan” from Ya' thi Néné Lands and Resources (YNLR), the representative body of the Denesuliné First Nations and Athabasca communities [1].</p> <p>The purpose of this review is to provide the CNSC’s Environmental Review Division (ERD) with informal, technical feedback on YNLR’s methodology for assessing cumulative environmental effects on Woodland Caribou, as requested. This technical feedback may be used to support future discussions with YNLR, including providing input and guidance on the methodology, if appropriate. Please note that this review does not constitute an approval or endorsement of the methodology, as this is outside the scope of CNSC’s role and mandate. It should also be noted that Environment and Climate Change Canada (ECCC) is reviewing this letter in parallel to CNSC staff.</p> <p>The scope of the review is Appendix 1 of the letter, titled “A GIS-based Method for Assessing Cumulative Environmental Effects Within the Athabasca Basin of Nuhenéné.” Although YNLR’s letter mentions that the model has been used for three proposed uranium mines in northern Saskatchewan, Appendix 1 does not present a project-specific analysis. Therefore, project-specific information is outside the scope of this review. Specifically, this memo is not in the scope of any ongoing or anticipated environmental assessment.</p> Background and Context: <p>YNLR has developed a cumulative effects model (CEM) that evaluates the availability of suitable habitat for the persistence of Woodland Caribou across the landscape of northern Saskatchewan. The model focusses on Woodland Caribou due to its high cultural and environmental value, status as a species at risk, and sensitivity to human disturbance.</p> <p>Appendix 1 presents the methodology for the model that is developed based on a geographic information system (GIS). The model includes data layers such as watershed boundaries, forest types, wildfire history, and human disturbance, which can be scaled to specific study areas. An example model is illustrated for a study area centered on Points North Landing, a logistics hub 40 km west of Wollaston Lake. The model is intended to assess cumulative effects of natural (e.g., wildfire) and anthropogenic (e.g., industrial) disturbance, which is interpreted in relation to federal thresholds for caribou disturbance management in northern Saskatchewan’s Boreal Shield range (SK1).</p>		

DERPA TECHNICAL REVIEW

Security Classification: Unclassified

YNLR lists potential applications of the model, such as for residual and cumulative effects assessments of new developments, designation and management of protected areas, and land use management.

CNSC Technical Feedback:

The technical feedback below is grouped by sections of the report and provides recommendations to address the comments for consideration. The review comments and recommendations are focused on enhancing the model and improving clarity.

Section on YNLR Cumulative Effects Model (CEM) (page 6)

Comment 1 – Clarification of model assumptions

In bullet #4, YNLR states that the model assumes that a high cumulative impact footprint equates to a low ecological health or resilience outcome for Woodland Caribou persistence. The term “assume” or “assumption” has a specific meaning in the context of modelling. Please clarify the assumptions of the GIS model, or whether this statement refers to the interpretation of the model results.

CNSC recommendation – Clarify the meaning of the term “assume” in the context of the GIS-based model.

Comment 2 – Scale of data layers

In bullet #5, YNLR states that the model employs coarse level data (e.g., fire history, habitats). The scale/resolution of the data sources is unclear and whether it is consistent among input data layers.

CNSC recommendation – Clarify the scale of the data sources, and describe how the model deals with potential differences in scale of the data layers.

Comment 3 – Species occurrence data

In bullet #5, YNLR states that the model does not use species occurrence data. Has YNLR considered to map this data? It would be particularly relevant to map sensitive areas for caribou life history such as calving, rutting, and wintering, to obtain information on the spatial proximity to disturbance. Moreover, it would be relevant to map species occurrence in preferred versus non-preferred habitats to validate the categories.

CNSC recommendation – Consider the mapping of species occurrence data with focus on sensitive periods.

Comment 4 – Clarification of reference

In bullet #7, YNLR refers to the Woodland Caribou National Recovery Plan (2020), however, the reference is unclear. Is it the ECCC Amended Recovery Strategy for the Woodland Caribou (*Rangifer tarandus caribou*), Boreal Population, in Canada (2020) [2]?

CNSC recommendation – Clarify the reference.

Section on Methods (pages 6-7)

Comment 5 – Information on the GIS model and input data

In general, there is insufficient information provided on the GIS model to enable independent replication of the model and verification of the model results.

YNLR states that several GIS data layers have been selected for inclusion in the model. Limited information is provided on these layers. Relevant information could include scale, year/age of data, accuracy, and whether any ground truthing was conducted. Please provide a hyperlink to the sources if available online. Alternatively, provide a full citation.

Moreover, no rationale is provided for the selection of the data sources and their applicability to the study area.

Lastly, there is no discussion on sources of uncertainty or limitations based on the input data. One example would be fire and human disturbance data from different years resulting in under- or over-estimation of total disturbance.

CNSC recommendation – Provide further information on the model and input data layers to allow for independent replication, and describe sources of uncertainty and how they can affect model results.

Comment 6 – Prioritization of data layers

In bullets #3 and #5, YNLR states that data layers for forest vegetation classes and human disturbance were obtained from three sources: Canvec, Government of Saskatchewan, and Natural Resources Canada. It is unclear how the three layers were prioritized in the GIS model.

CNSC recommendation – Provide information on how layers were prioritized in the model.

Comment 7 – Categorization of forest vegetation classes

In paragraph #2, YNLR states that forest vegetation classes are divided into preferred caribou habitat and non-preferred caribou habitat based on the Woodland Caribou National Recovery Plan (2020). The preferred habitat classes include Black Spruce Bog, Mature Black Spruce Forest, Mature Jack Pine Forest, and Open Muskegs. Please clarify the exact reference (page number) used for the selection of the four preferred habitat classes.

It should be noted that ECCC (2020) [2], Table H-4a. *Biophysical attributes for boreal caribou critical habitat in the Boreal Shield West ecoregion*, which overlaps with SK1, outlines habitats being used during caribou life history. These habitats additionally include conifer/tamarack-dominated peat land complexes, mixed forests, dry islands in the middle of muskegs, small lakes, wooded lakeshores, and open riparian habitats.

Please clarify the criteria for categorizing the vegetation classes as non-preferred. Additionally, a definition and/or an explanation of the terms “preferred” and “non-preferred” with respect to caribou is needed. For example, can non-preferred habitat still contribute to caribou life history? Can it serve for habitat connectivity?

CNSC recommendation – Clarify the categorization of preferred *versus* non-preferred caribou habitat for forest vegetation and explain the terms “preferred” and “non-preferred”.

Comment 8 – Calculation of remaining functional Woodland Caribou habitat

Regarding the calculation of remaining functional Woodland Caribou habitat described in paragraph #5, it is unclear how overlapping layers are accounted for in the modelling, e.g., overlap of industrial disturbance buffer with forest fire.

CNSC recommendation – Clarify how the model deals with overlapping layers.

Comment 9 – Application of the SK1 disturbance management threshold

In paragraph #5, YNLR states that the calculated amount of remaining functional Woodland Caribou habitat is expressed as a percentage of the watershed or other area and compared to the percentage caribou habitat recovery goals in the Woodland Caribou National Recovery Plan (2020).

It is not appropriate to compare the % of functional habitat available for a given study area (unequal to the SK1 range) directly to the disturbance management threshold for SK1, as the threshold applies to the whole SK1 range.

This comment is also applicable to the model example analysis presented on page 8 which compares preferred habitat available in the study area (unequal to the SK1 range) to the disturbance management threshold for SK1.

CNSC recommendation – Revise the interpretation of the model results to align with the applicability of the SK1 disturbance management threshold.

Comment 10 – Clarification of the SK1 disturbance management threshold

YNLR states that for the SK1 Woodland Caribou management range, the recovery goals are no more than 65% combined human and naturally disturbed habitat, and no less than 35% undisturbed habitat to support the maintenance and recovery of the caribou populations present. This statement does not reflect the information in ECCC (2020) [2].

For accuracy, please note that the disturbance management threshold for SK1 is 40% undisturbed habitat in the range (or 60% disturbed habitat). Total anthropogenic disturbance in the range should be maintained at or below 5%.

CNSC recommendation – Revise the information on the applicable disturbance management threshold accordingly.

Section on Model Example Analysis (pages 8-9)

Comment 11 – Clarification of example study area

To illustrate the model, a study area was selected representing a 100 km radius area in northern Saskatchewan centered on Points North Landing. While CNSC staff acknowledge that this example is for illustration only, it would be relevant to provide information on whether the area has ecological significance for caribou, or how it relates to a watershed or caribou home ranges. This is important context since the spatial boundary affects the calculation of % of preferred habitat available.

CNSC recommendation – Clarify the rationale for selection of the example study area.

Comment 12 – Presenting data separately for natural and anthropogenic disturbance

Table 1 includes a row labelled “Disturbed” under “Not Preferred Habitat”. It is assumed that this category includes both natural (fire) and anthropogenic disturbance. CNSC staff recommend presenting the data separately for natural and anthropogenic disturbance. Anthropogenic disturbance is not equivalent to fire, with the former having a stronger negative effect on caribou population condition ([2], page 40). Moreover, anthropogenic disturbance in the SK1 range should be maintained at or below 5% ([2], page viii).

CNSC recommendation – Provide modelling results separately for natural and anthropogenic disturbance.

Section on Potential Applications (pages 9-10)

Comment 13 – Indigenous use data

YNLR states that the model can potentially be deployed in combination with spatial traditional knowledge and use data. CNSC staff recall from a presentation in August 2023 that the model may also be able to include data on Indigenous use of the area (e.g., footprint of travel, hunting grounds, cabins, harvesting sites).

CNSC recommendation – Clarify whether YNLR intends to include Indigenous use data in the model, and how this could be considered in the cumulative effects analysis.

Comment 14 – Next steps

In addition to the technical aspects of the model summarized in the submission, CNSC staff recommend adding information on the next steps in model development and deployment, for a more comprehensive picture of ongoing and future work.

CNSC recommendation – Consider adding a section on next steps.

Conclusion:

DERPA TECHNICAL REVIEW

Security Classification: Unclassified

Environmental Risk Assessment Division (ERAD) staff have reviewed YNLR's GIS-based method for assessing cumulative environmental effects as requested by ERD, and have provided 14 technical recommendations for consideration. These recommendations focussed on providing guidance on enhancing the model and improving clarity. Please note that this review does not constitute an approval or endorsement of the methodology. It should also be noted that ECCC is reviewing YNLR's letter in parallel to ERAD staff.

References:

- [1] Ya'thi Néné Land and Resource Office. 2024. Re: the environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan. e-Doc # [7305191](#).
- [2] Environment and Climate Change Canada. 2020. Amended Recovery Strategy for the Woodland Caribou (*Rangifer tarandus caribou*), Boreal Population, in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada, Ottawa. xiii + 143pp. Available online at: https://wildlife-species.canada.ca/species-risk-registry/virtual_sara/files/plans/Rs-CaribouBorealeAmdMod-v01-2020Dec-Eng.pdf

From: [Way, Jessica](#)
To: [Bruce Hanbidge](#); [Yen, Wish](#);
[Edino, Marcus \(ECCC\)](#); gayle.hatchard@ec.gc.ca; heather.konopski@ec.gc.ca;
Cc: [Beaton, Dana](#); [Kwamena, Nana-Owusua](#); [Frigault, Nicole](#); [Dennis Sherratt](#);
[Paul James](#); [Froess, Ryan](#); garrett.schmidt@yathinene.com
[\(<garrett.schmidt@yathinene.com>\)](mailto:garrett.schmidt@yathinene.com);
Subject: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model
Sent: 2024-07-16 10:08:00 AM

Hi Bruce,

Quick correction, my email should have said June, not July. Updated in red below.

See you later today!
Jes

From: Way, Jessica
Sent: Monday, July 15, 2024 6:04 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Cc: Edino, Marcus (ECCC) <Marcus.Edino@ec.gc.ca>; gayle.hatchard@ec.gc.ca; heather.konopski@ec.gc.ca; Beaton, Dana <dana.beaton@cnscccsn.gc.ca>; Kwamena, Nana-Owusua <nana-owusua.kwamena@cnscccsn.gc.ca>; Frigault, Nicole <nicole.frigault@cnscccsn.gc.ca>; Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; garrett.schmidt@yathinene.com (<garrett.schmidt@yathinene.com>)
Subject: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model

Hi Bruce,

Thank you for sending along this information. We had previously shared Appendix 1 of the February 2024 letter from YNLRO to Denison that we received back in **June**, with both ECCC and CNSC subject matter experts. Although the teams have received and reviewed this information, the focus of the review was on the broader methodology described in the May 14th letter with the subject: *the environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan*.

In addition to the comments provided by CWS, please see attached some additional questions and recommendations from CNSC. As I noted in my email on Friday, these are the result of review by our Environmental Risk Assessment Division (ERAD) counterparts here at the CNSC, and I apologize again that we aren't giving you more time with it before the meeting. While the Canadian Wildlife Service (CWS) comments were slightly more focused on the Recovery Strategy for the Woodland Caribou, the CNSC's comments are slightly more broad. I think you will find they are consistent with the comments from CWS.

We have a number of attendees coming to discuss the items on the agenda tomorrow, but in terms of the reviews we conducted, our intention is to focus more on the methodology proposed by YNLRO. I think we can use Wheeler as an example in our discussions, but the reviews by Canadian Wildlife Service (CWS) and ERAD staff are not specific to how it has been applied to Wheeler; it is feedback that we hope will support YNLRO in enhancing and improving the model that you have developed. This being said, we do acknowledge the information that has been shared related to Wheeler River and we will ensure this information is taken into consideration as part of our evaluation of the proposed Wheeler River Project.

Looking forward to further discussing.

Sincerely,
Jes

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Monday, July 15, 2024 12:32 PM
To: Yen, Wish <wish.yen@cnsccsn.gc.ca>
Cc: Way, Jessica <jessica.way@cnsccsn.gc.ca>; Edino, Marcus (ECCC) <Marcus.Edino@ec.gc.ca>; corinna.watt@ec.gc.ca; gayle.hatchard@ec.gc.ca; heather.konopski@ec.gc.ca; Pollock, Brady ENV <brady.pollock@gov.sk.ca>; Beaton, Dana <dana.beaton@cnsccsn.gc.ca>; Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnsccsn.gc.ca>; Frigault, Nicole <Nicole.Frigault@cnsccsn.gc.ca>; Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Froess, Ryan <ryan.froess@cnsccsn.gc.ca>
Subject: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Dear Wish:

Thank you again for forwarding the ECCC comments in the appended email of 09 July 2024. While I was reviewing these ECCC comments for our meeting tomorrow, I noted that there were no comments on YNLRO's CE analysis for the Wheeler River EIA process. Rather, all their comments focused on our CE analysis for the area around Points North.

I did send the information on our CE analysis for Wheeler River in my correspondence of 19 June 2024, as I previously committed to do; however, as it was in an attachment to another letter, I am concerned that it may have been overlooked, and not sent to ECCC. Therefore, I am resending information on our CE analysis for the Wheeler River EIA process.

Respectfully

Bruce Hanbidge
Strategic Advisor | Ya'thi Néné Land and Resource Office



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From: Yen, Wish <wish.yen@cnscccsn.gc.ca>
Sent: Tuesday, July 9, 2024 1:47 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Cc: Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Way, Jessica <jessica.way@cnscccsn.gc.ca>
Subject: EXTERNAL: ECCC feedback on the Cumulative Effects Model

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Bruce,

Please find the feedback and suggestions from ECCC attached for your team's consideration prior to our meeting next week.

Thank you,
Wish Yen (she, her, elle)
Environmental Review Officer
Canadian Nuclear Safety Commission/Government of Canada
wish.yen@cnscccsn.gc.ca | 343.553.2233



Government
of Canada

Gouvernement
du Canada

From: [Bruce Hanbidge](#)
To: [Way, Jessica](#)
Subject: RE: EXTERNAL: RE: EXTERNAL: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model
Sent: 2024-07-16 1:21:53 PM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Jessica:

YNLR is not asking you to prepare for discussion of these items, certainly not on short notice.

The intent was to elaborate on YNLR reasons presented in the correspondence for why YNLR thinks that these four items are significant. CNSC comments now or later, is your prerogative.

Respectfully

Bruce Hanbidge
Strategic Advisor | Ya'thi Néné Land and Resource Office



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f in

The content of this email is confidential and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Tuesday, July 16, 2024 10:51 AM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Subject: EXTERNAL: RE: EXTERNAL: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Bruce,

With regards to the newly added agenda item that states:

2. Request for Review of YNLR correspondence, specifically their 4 requests of Denison: CNSC comment is requested:
 - a. The nature of the consultation with YNLR;
 - b. Cumulative effects, especially on woodland caribou;

Sincerely,
Jes

From: Way, Jessica
Sent: Tuesday, July 16, 2024 12:29 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; kristen.mozel@ec.gc.ca; Sesin, Verena <verena.sesin@cnscccsn.gc.ca>
Subject: RE: EXTERNAL: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model

Hi Bruce,

Thank you for your email. As we discussed on the phone half an hour ago, understood. We will go ahead with the cumulative effects topics and will look to schedule a follow up discussion on the methodology in the coming weeks. I will follow up with attendees.

Talk soon,

Jes

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Tuesday, July 16, 2024 12:19 PM
To: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>; kristen.mozel@ec.gc.ca; Sesin, Verena <verena.sesin@cnscccsn.gc.ca>
Subject: RE: EXTERNAL: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Dear Jessica:

Thanks for the written comments from yesterday. I have tried to track you down this morning by phone to discuss, but I have not yet been able reach you. Therefore, out of courtesy to the other attendees to our meeting, I have cc'ed them all on this email.

Yesterday's commends are greatly appreciated; but there is insufficient time for YNLR to adequately assess and prepare for a discussion of these items. I therefore, must postpone the meeting on these comments until a later date.

I am still prepared to meet CNSC to discuss points 1 and 2 on the attached and abbreviated agenda, as these deal specifically with procedural questions.

I look forward to hearing from you.

Respectfully

Jessica:

Thank you for the attached email and its technical review. As it was sent just yesterday, and the time it was sent was after the end of both of our working days; I have only just opened the letter and attachment.

I request that you please call me now to discuss the content of the attached email.

I will stand by for your call.

Respectfully

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>
Sent: Monday, July 15, 2024 4:04 PM
To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Yen, Wish <wish.yen@cnscccsn.gc.ca>
Cc: Edino, Marcus (ECCC) <Marcus.Edino@ec.gc.ca>; gayle.hatchard@ec.gc.ca; heather.konopski@ec.gc.ca; Beaton, Dana <dana.beaton@cnscccsn.gc.ca>; Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnscccsn.gc.ca>; Frigault, Nicole <Nicole.Frigault@cnscccsn.gc.ca>; Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Garrett Schmidt <garrett.schmidt@yathinene.com>
Subject: EXTERNAL: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model

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Hi Bruce,

Thank you for sending along this information. We had previously shared Appendix 1 of the February 2024 letter from YNLRO to Denison that we received back in July, with both ECCC and CNSC subject matter experts. Although the teams have received and reviewed this information, the focus of the review was on the broader methodology described in the May 14th letter with the subject: *the environmental impact assessment process as it applies to proposed mineral exploration extraction and associated developments in northern Saskatchewan*.

In addition to the comments provided by CWS, please see attached some additional questions and recommendations from CNSC. As I noted in my email on Friday, these are the result of review by our Environmental Risk Assessment Division (ERAD) counterparts here at the CNSC, and I apologize again that we aren't giving you more time with it before the meeting. While the Canadian Wildlife Service (CWS) comments were slightly more focused on the Recovery Strategy for the Woodland Caribou, the CNSC's comments are slightly more broad. I think you will find they are consistent with the comments from CWS.

We have a number of attendees coming to discuss the items on the agenda tomorrow, but in terms of the reviews we conducted, our intention is to focus more on the methodology proposed by YNLRO. I think we can use Wheeler as an example in our discussions. but the reviews by Canadian

Looking forward to further discussing.

Sincerely,
Jes

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>
Sent: Monday, July 15, 2024 12:32 PM
To: Yen, Wish <wish.yen@cnscccsn.gc.ca>
Cc: Way, Jessica <jessica.way@cnscccsn.gc.ca>; Edino, Marcus (ECCC) <Marcus.Edino@ec.gc.ca>; corinna.watt@ec.gc.ca; gayle.hatchard@ec.gc.ca; heather.konopski@ec.gc.ca; Pollock, Brady ENV <brady.pollock@gov.sk.ca>; Beaton, Dana <dana.beaton@cnscccsn.gc.ca>; Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnscccsn.gc.ca>; Frigault, Nicole <Nicole.Frigault@cnscccsn.gc.ca>; Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>
Subject: RE: EXTERNAL: ECCC feedback on the Cumulative Effects Model

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Dear Wish:

Thank you again for forwarding the ECCC comments in the appended email of 09 July 2024. While I was reviewing these ECCC comments for our meeting tomorrow, I noted that there were no comments on YNLR's CE analysis for the Wheeler River EIA process. Rather, all their comments focused on our CE analysis for the area around Points North.

I did send the information on our CE analysis for Wheeler River in my correspondence of 19 June 2024, as I previously committed to do; however, as it was in an attachment to another letter, I am concerned that it may have been overlooked, and not sent to ECCC. Therefore, I am resending information on our CE analysis for the Wheeler River EIA process.

Respectfully

Bruce Hanbidge
Strategic Advisor | Ya'thi Néné Land and Resource Office



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To: Bruce Hanbidge <bruce.hanbidge@yathinene.com>

Cc: Dennis Sherratt <sherratt@sasktel.net>; Paul James <weimnut@gmail.com>; Way, Jessica <jessica.way@cnscccsn.gc.ca>

Subject: EXTERNAL: ECCC feedback on the Cumulative Effects Model

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon Bruce,

Please find the feedback and suggestions from ECCC attached for your team's consideration prior to our meeting next week.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnscccsn.gc.ca | 343.553.2233



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From: [Yen, Wish](#)
To: [Bruce Hanbidge](#); [Dennis Sherratt](#); [Paul James](#);
Cc: [Way, Jessica](#); [Froess, Ryan](#); [McKeown, Justin](#);
Subject: RE: CNSC/ECCC/YNLR mtg
Sent: 2024-07-24 3:34:10 PM

Good afternoon Bruce, Paul and Dennis,

Please find the meeting minutes from our discussion last week attached for your team's review.

I also wanted to follow up on the technical meetings related to water quality and environmental monitoring and whether your team has any availabilities in early August that I can save as a placeholder with SMEs?

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer | Agente en examen de l'environnement

Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire

wish.yen@cnsccsn.gc.ca | 343.553.2233



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Ya'Thi Néné Lands and Resource Office/ YNLRLO-CNSC Meeting Minutes – Denison
Mines Wheeler River Project

July 16, 2024 1-2:30PM CST

YNLRO staff - Bruce Hanbidge, Dennis Sherratt, Paul James CNSC staff - Jes Way, Wish Yen, Ryan Froess, Justin McKeown, Adrienne Ethier, Verena Sesin and Samantha Longo
1. Procedural clarifications for Guidelines and Policies

- CNSC staff confirmed that the three guidelines and policies developed by IAAC are the most current documents used for the Denison Wheeler River EIA process.
 - [Technical Guidance for Assessing the Cumulative Environmental Effects under the Canadian Environmental Assessment Act 2012](#)
 - [Operational Policy Statement: Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 - Canada.ca](#)
 - [Considering Aboriginal traditional knowledge in environmental assessments conducted under the Canadian Environmental Assessment Act, 2012 - Canada.ca](#)
- How does CNSC consider existing residual impact on a site from prior human disturbances? (i.e., who is responsible for cleanup and restoration?)
 - Paul: This question is a result of YNLRO's concern around significant increase in exploratory activities and cut lines which are not characterized or considered as a previous project impact in Denison's draft EIS.
 - Denison's environmental risk assessment and EIS involved characterizing the baseline prior to any Project activities taking place. The baseline characterization data captures pre-existing effects and anthropogenic disturbances such as mining

exploration. Throughout the EA/ERA assessment, CNSC staff look at the predicted effects, determination of significance of those effects, mitigation measures and the conclusion of the significance of these effects. CNSC staff also analyze the proposed monitoring and follow-up programs to ensure Project effects are appropriately mitigated. For example: baseline water quality data collected at the site should characterize existing conditions that may have been impacted by pre-existing anthropogenic disturbances.

- How does CNSC consider a CE analysis that does, or does not, follow CNSC guidelines. Examples for which clarity is requested:
 - the application of buffers around linear disturbances (aka: cutlines)
 - YNLRO asserts that Denison's current assessment does not have buffers around all of the linear disturbances, despite what is stated in the technical guidance
 - YNLRO is concerned that the Project effects far exceed what Denison is concluding.
 - YNLRO's largest concern is the CE assessment of mining. As an example, NexGen's CE analysis yielded significant impacts to woodland caribou as a result of the proposed project, so it's surprising that Denison indicates there will be no significant effects to woodland caribou from the Wheeler River CE assessment.
 - Cumulative effects assessments project forward for foreseeable projects that are adjacent to the proposed project. A boundary that corresponds to the development is assessed. YNLRO has identified 18 other companies within the sub-watersheds that are undertaking exploratory licenses which generate hundreds of linear cut lines.
 - NexGen's project is located in the SK2 west woodland caribou range and the population is not a self-sustaining population while the SK1 population is. This could be why there are different assessment results between the NexGen and Wheeler River projects. Different populations of caribou have been assessed by the Province of SK and currently new and updated data is available. The size the two projects and land disturbance (i.e. project Zone of Influence) is also quite different and may play a factor in the determination on significance of the woodland caribou assessment results.
 - CNSC staff have validated with IAAC that foreseeable projects under CEAA 2012 does not include exploration activities. The Gryphon deposit adjacent to the proposed Wheeler Project currently falls under this category and will not be assessed under the cumulative effects assessment (if there is not a formal indication that a "project" is intended to proceed, for example though a licence application, it is not considered a reasonably foreseeable project).
 - YNLRO is aware that only 1-2 mines come to fruition out of every 100 explorations, but that these explorations could change an assessment of a Project's impacts. These concerns are related to caribou populations as they will be the most impacted by cut lines (currently experiencing substantial declines) due to these exploration activities.

- Mitigation and restoration of these cut-lines is necessary. YNLRO wants CNSC and IAAC to recognize that exclusion of exploration sites in cumulative effects assessment is a gap. There can't be mitigation or restoration if the problem isn't identified.
 - CNSC is aware of these concerns from other Nations as well and recommends YNLRO continue to raise these concerns with the Province of SK as it's the Province of SK's jurisdiction regarding restoration or minimization of exploration activities.
- YNLRO has reached out to Denison and the Province of Saskatchewan and requested that cut lines be considered in the cumulative effects assessment. YNLRO recognizes that the Province of SK's guidelines for exploration must be changed and understands that it's history catching up on exploration, but this has not been addressed. YNLRO wants Denison to acknowledge that there are existing human disturbances that will impact the Project. YNLRO also wants to promote and request a social licence from the CEO's of companies.
- Saskatchewan caribou offset work
 - YNLRO wants proponents to quantify and recognize in their impact calculations, is because it will affect numbers that are generated in the offset calculations. This is important when discussing "compensations". YNLRO has not yet seen the offset calculations to date.
- The determination of spatial and temporal boundaries (the use of 1 or more of the 4 methodologies listed)
 - The technical guidance and policies are not prescriptive. CNSC staff expect Proponents to provide scientific justifications for why standards/guidance will not be followed. Current guidance and policies are high level to provide space for Proponents to provide their own methodology and deviation from best practices must have scientifically sound justifications.
 - The guidance points to zones of influence of a project to identify relationships and cause and effect pathways to VECs. Denison sets the boundaries for the cumulative effects assessment considering the geographic extent of predicted project effects as a factor.
- How does CNSC view the application of the iterative process for scoping cumulative environmental effects and how the following steps 1 to 5 are applied according to the Ref^[2]
 - EA process in Canada is a planning tool, but there are still deficiencies as it's a project based process. Government of Canada is looking to assess effects more cumulatively, but it is still being developed.
 - CNSC recommends reaching out to Denison to determine if there are any actions Denison plans or is willing to take to restore their exploratory cutlines in order to better address cumulative effects in the immediate project area. I think this fine and can reduce to the above?
- How does CNSC deal with a failure by the proponent to clearly identify their CE methodology see ref

- CNSC staff and SMEs from other federal agencies who assist in the EIA process go through the iterative process of assessing the draft EIS to ensure there is sufficient information to draw conclusions around Project effects.
 - CNSC staff reviewed the methodology shared by the Proponent. Denison has described their overall approach in section 5 of the draft EIS, and provide specific details in the relevant chapters specific to how they have evaluated cumulative effects for each component. CNSC staff assessed whether the methodology is acceptable/sufficient and have shared IRs when details are not sufficient. As part of the iterative process, Denison must provide sufficient details to satisfy federal authorities and CNSC SMEs prior to moving towards a final EIS submission.
 - There have been no conclusions drawn from the EA process yet, CNSC continue to receive responses to IRs on the draft EIS as part of the iterative review process.
 - YNLRO is concerned around how Denison has or has not completed the cumulative effects assessment and has requested Denison provide this methodology to the YNLRO. Denison brought in a consultant from eastern Canada who was not able to address YNLRO concerns.
 - YNLRO has had difficulties around requesting this information from Denison
 - The issue is not necessarily that there is no methodology provided in the EIS, but that there are elements missing that YNLRO would expect to see and these gaps are documented in YNLRO's submission to CNSC
- What is the CNSC's current definition of Aboriginal traditional knowledge? What is CNSC's current position on where ATK can be brought into EAs?
- [Indigenous Knowledge Policy Framework](#)
 - YNLRO shared an IK study with Denison which was submitted as part of the draft EIS package. This study, including land use, VCs, sites of cultural significance etc., are expected to be incorporated by Denison into the EIS. CNSC staff's EA report will also evaluate this study to ensure that YNLRO knowledge was appropriately assessed by the proponent. CNSC staff will work with YNLRO to ensure that this knowledge is accurately captured and considered in the EA report.
 - In terms of IK, YNLRO has digitized everything and are able to share the most current information and share this interface with proponents.
 - CNSC only have access to the information that has been shared with us through the draft EIS submission. We will consider this information when drafting our EA report and the Rights Impact Assessment. We also have confidentiality policies in place if the YNLRO wish to share additional information that should not be publicized or added to the record.
 - The Appendix in the draft EIS that was flagged by Bruce is a very high level summary of IK shared by YNLRO. Should there be more detailed data that could be shared with CNSC or ECCC SMEs for consideration or assessment.
 - Dichronic data – more data that is not yet ready to be shared

2. Request for review of YNLRO correspondence, specifically the 4 requests of Denison.
- YNLRO has shared letters with CNSC and Denison
 - May 14 – Letter to CNSC and Province of Saskatchewan identifying the 4 requests of Denison. To date, the request to address the nature of consultation with YNLRO has not been addressed by any company.
 - The nature of the consultation with YNLRO – this is a concern that is not specific to Wheeler River
 - YNLRO wants to be a collaborative, active partner rather than a passive recipient of information. YNLRO wants to be involved at the concept stage and experimental design, rather than reviewing a plan. It's more cost-effective and efficient.
 - This is a result of a historical mistreatment of Indigenous peoples in Canada. There are court cases constantly resulting from historical projects. Although YNLRO are not technical experts, community members want to be included in the planning process to build knowledge and trust in a project. The "rights" of proponents and their projects seem to override the Rights of Indigenous peoples.
 - YNLRO want the nature of consultation with all Proponents to change. A "social licence" will go a long way with community members and blessing the project.
 - Cumulative effects on woodland caribou in the letter is very concise, YNLRO wants to put their disagreements on this topic on the Record. Common thread with all companies is that they are selectively structuring a methodology to exclude parameters in Government of Canada's policies.
 - CNSC is requesting that YNLRO share the excluded parameters in Denison's methodology.
 - Water quality impacts and its associated fish health
 - YNLRO values fish considerably as a VC as it is a key protein source to community members. This will impact their diet and their incomes considerably. The Dene have already experienced impacts of contamination on fish due to Beaverlodge and Uranium City. Denison's impacts on the downstream watersheds could be on Wollaston, Reindeer and into the Fond du Lac river.
 - Fish and water sampling programs are critical and need to be statistically robust.
 - CNSC SMEs have flagged similar concerns around water quality with Denison and are still assessing the data and the monitoring program developments.
 - Environmental monitoring programs
 - YNLRO wants to ensure that the monitoring programs will be statistically robust analysis which avoid type 2 errors.
 - YNLRO wants to be part of the monitoring program development (related to changing the nature of the consultation).
 - CNSC's Independent Environmental Monitoring Program is not intended to be a fully robust monitoring program, rather it is a tool to confirm measurements that licensees provide in their monitoring programs and to build confidence with the public.
 - CNSC is also aware of numerous monitoring programs from proponents, communities and other government entities. It may be to everyone's benefit to share more about the programs that will be required if Denison gets a license to operate.

Action Items

- YNLRO to share a paper regarding the CNSC's sampling program's statistical robust analysis
- CNSC and YNLRO to set up technical meetings related to water quality and environmental monitoring
 - Bruce to provide some potential days and times in early August
- CNSC will share our Issues and Concerns tables for YNLRO's validation

-----Original Appointment-----

From: Bruce Hanbidge <bruce.hanbidge@yathinene.com>

Sent: Monday, July 8, 2024 4:27 PM

To: Bruce Hanbidge; Way, Jessica; Froess, Ryan; Dennis Sherratt; Paul James; Yen, Wish

Subject: CNSC/ECCC/YNLR mtg

When: July 16, 2024 1:00 PM-2:30 PM (UTC-06:00) Saskatchewan.

Where: Saskatoon Teams Room

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[\[2\]](#) Step 1 to Step 5 of **Operational Policy Statement: Assessing Cumulative Environmental Effects under the *Canadian Environmental Assessment Act 2012* (Updated March 2015)**

From: [Yen, Wish](#)
To: [Bruce Hanbidge](#); [Dennis Sherratt](#); [Paul James](#);
Cc: [Way, Jessica](#); [Froess, Ryan](#); [Boser, Sydney](#); [Noakes, Rain](#);
garrett.schmidt@yathinene.com;
Subject: Request for Review: Wheeler River Project - draft Issues and Concerns table
Sent: 2024-07-30 1:34:01 PM

Good morning Bruce,

Please find attached the draft Issues and Concerns tables that CNSC for your team to review. As mentioned before, this is an evergreen document that we will continue to update throughout the EA process. Please don't hesitate to reach out if there are any issues/concerns missing or that have been mis-interpreted.

I also wanted to follow up on whether there was an agenda or broad/specific questions your team could provide me ahead of our meeting on August 8th as I want to ensure we have the right SMEs at the meeting to speak to your team's concerns. As the meeting is a little over a week away, I have placeholders in SMEs' calendars, but would like to ensure they have a confirmed invite. Please let me know if it would be feasible to share this information with me by this Thursday, **August 1st**.

Thank you,

Wish Yen (she, her, elle)

Environmental Review Officer

Canadian Nuclear Safety Commission/Government of Canada

wish.yen@cnsccsn.gc.ca | 343.553.2233



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**Ya'Thi Néné Lands and Resources/Canadian Nuclear Safety Commission
YNLR-CNSC Working Group Meeting
In-Person at CNSC Office- Saskatoon
September 17, 2024, 9:00 am – 4:00 pm**

Attendees:

Archie Disain – ALPC Member (Black Lake)
Chris Toutsaint - ALPC Member (Fond du Lac)
Louise Bougie-Still - ALPC Member (PRO – Uranium City)
Mary Denechezhe - ALPC Member (Hatchet Lake)
Emil Dzeylion - ALPC Member (Hatchet Lake)
Travis Boneleye - ALPC Member (Black Lake)
Garrett Schmidt - YNLR Executive Director (Co-Chair)
Kathy Hay – YNLR Corporate Affairs Manager
Celeste Robillard – YNLR Admin/Comms Assistant
Ryan Froess – CNSC Senior Advisor (Co-Chair)
Richard Snider – CNSC Senior Project Officer, Cigar Lake and Beaverlodge
Patrick Burton – CNSC Director – Uranium Mines and Mills
Justin McKeown – CNSC Senior Advisor (ISRDR)

Agenda:

9:00 AM – Welcome, coffee and opening prayer
9:30 AM – Review and adopt agenda and adopt previous meeting minutes (June 3, 2024)
10:00 AM – Beaverlodge and Gunnar update: January Beaverlodge hearing (Richard to attend in person with Patrick)
11:00 AM – BREAK
11:15 AM – Update on IEMP, Beaverlodge results and Cigar Lake sampling (Jean attend virtually?)
12:00 PM – LUNCH
1:00 PM – Update on CEAA EAs (Denison, NexGen etc.)
2:00 PM – YNLR Update on projects of interest they are working on
2:30 PM – BREAK
3:00 PM – Update on PFP and Stream 3 funding applications from YNLR
3:30 PM – Next meetings: October 17, 2024 with CNSC leadership
4:00 PM – Closing prayer & meeting adjournment

1. Scope of jurisdiction and authority, for CNSC, when it comes to:
a. monitoring of effluent released into waterways;

CNSC staff regulate effluent releases and have jurisdiction with respect to water ways, but also have Memoranda of Understanding (MoUs) with the province of Saskatchewan, and Environment and Climate Change Canada, and work with the Department of Fisheries and Oceans which details the co-regulation between the CNSC and the Province of Saskatchewan. CNSC staff's work in regulating effluent include reviews of licensee programs, verification of the implementation of those programs through reviews of licensee reports and independent inspections, and independent sampling of effluent. CNSC staff also carry out independent sampling of the environment near nuclear sites.

Jurisdiction over environmental matters is complex and CNSC staff also have other Memoranda of Understanding with federal agencies such as Environment and Climate Change Canada, the Department of Fisheries and Oceans, and the Impact Assessment Agency of Canada. A full list of CNSC domestic MoUs is available here: [Domestic arrangements \(cnsccsn.gc.ca\)](https://www.cnsccsn.gc.ca/domestic-arrangements)

b. what are the applicable acts and regulations that enable CNSC as the regulator

The Nuclear Safety and Control Act (NSCA) is the primary legislation that provides the CNSC the authority as Canada's nuclear regulator. The federal regulations under the NSCA are the primary regulations for environmental protection and include the *General Nuclear Safety and Control Regulations* (GNSCR) and the *Uranium Mines and Mills Regulations* – a full list of regulations under the NSCA is here: [List of regulations \(cnsccsn.gc.ca\)](https://www.cnsccsn.gc.ca/list-of-regulations). The CNSC have harmonized effluent limits with Schedule 4 of the Metal and Diamond Mining Effluent Regulations (MDMERs) enforced by Environment and Climate Change Canada.

c. are either a. or b. delegated to provincial authorities;

The CNSC does not delegate any authority to the Provinces with respect to environmental monitoring as required by CNSC licenses, the NSCA, and Federal regulations under the NSCA; however, when there are provincial requirements pertaining to effluent that are additional or complementary to CNSC requirements, the province is the authority for those specific aspects and the CNSC cannot enforce them. As previously mentioned, both parties collaborate as detailed in the MoU between the two parties to ensure that requirements are being met, and to ensure that both parties are aware of the findings of the other party.

d. what responsibilities are delegated to the company (license holder) for monitoring and reporting of watercourses where effluent is released; and

The CNSC does not delegate responsibilities to the licensee, however Parliament has chosen via the NSCA and associated regulations to place requirements on licensees related to environmental protection. For instance, GNSCR 12(1)(c) and UMMR 3(c) require that all uranium mine and mill licensees take all reasonable precautions to protect the environment and the health and safety of persons. CNSC Licences for operating uranium mines and mills all require that the licensee have an environmental protection program in place to meet these requirements. These environmental protection programs must include how the licensee controls releases of contaminants in effluent, the taking of routine environmental samples and the submission of effluent monitoring data to

CNSC staff for review, among many other topics. The licensee is also required by the NSCA and CNSC regulations to retain these records for specified periods and cannot destroy or dispose of them without express consent of the CNSC. CNSC inspectors can and have requested these records during inspections to review compliance with the CNSC licence and licensee's Environmental Program accepted by the CNSC.

e. what are the conditions and penalties for failure to comply with delegated responsibilities.

The CNSC utilizes a graduated enforcement strategy for application of our regulatory tools ([The CNSC's approach to compliance verification and enforcement \(nuclearsafety.gc.ca\)](https://www.nuclearsafety.gc.ca)) to ensure, and encourage, compliance. CNSC inspectors are trained extensively on when the application of these tools is required based on the nature and circumstances of the offence. Lower-level infractions with no lasting impacts will generally result in an action to prevent future occurrences; higher level infractions could result in Orders, Administrative Monetary Penalties, or even prosecution.

f. How, or does, the regulatory process address the need amend issued licenses when the cumulative effects of increasing numbers of companies – that, in future, receive licenses to release effluents into the same watercourse – result in the collective amount of all effluents exceeding allowable threshold levels

CNSC Licenses are not the document in which the limits for effluent are detailed; these requirements are set out in the Licence Condition Handbook (LCH) associated with the CNSC licenses. CNSC Staff regularly review LCHs to implement new standards and best practices. Should the need arise, CNSC staff will enforce new requirements as necessary to better protect people and the environment from potential hazards posed by nuclear facilities. As an example, the Commission has recently approved CNSC REGDOC-2.9.2 *Environmental Protection: Controlling Releases to the Environment* which will be implemented in due course at uranium mining and milling facilities.

The cumulative effects of multiple facilities being developed in the same area is considered as part of Environmental Assessment or Impact Assessment – each successive project must consider any new impacts in the light of the facilities which are already there.

Environmental Risk Assessments (ERAs) can be used as a tool to assess cumulative effects. ERAs are used to characterize risk to receptors (human and non-human biota) based on data collected in the receiving environment and project emissions data (ex. Air emissions, liquid effluent, etc.). ERAs can be predictive or retrospective in nature, and are required every 5 years or whenever there is a significant change to licensed activities (ex. During a licensing change from LTC to LTO) as per CSA Standard N288.6. Predictive ERAs used during the EA/IA process can assess the level of risk from multiple projects on receptors using predictive modelling, and those predictions are then validated with monitoring data. For existing sites, ERAs are generally retrospective and use monitoring data to determine if data remains within the predicted range and conclusions from the previous ERA, or if there has been a change in the level of risk to a receptor. If the risk profile to a receptor has changed and is elevated, investigative measures to determine why are implemented, and adaptive management may be required of the licensee.

2. Monitoring after the issuance of a license

a. Who is responsible for regulatory oversight and compliance with a license;

The CNSC is the primary regulator for oversight and compliance with a CNSC licence, however CNSC staff work with provincial governments and federal agencies to ensure requirements from all levels of government are followed. CNSC staff periodically carry out collaborative field activities with other regulators such as the Saskatchewan Ministry of Environment.

I. Do the regulators do any sample collection or review and evaluation of samples submitted by the license holder and if so at what frequency and interval;

Licensees are primarily responsible to collect regular samples, and CNSC inspection teams may take compliance verification samples to ensure licensee data is correct. CNSC staff regularly review monitoring data from samples taken by licensees. Licensees are required to keep this information, and CNSC staff also retain the information. CNSC staff also implement an Independent Environmental Monitoring Program (IEMP - see [Independent Environmental Monitoring Program \(IEMP\) \(cnscccsn.gc.ca\)](http://cnscccsn.gc.ca)) to measure for the possible presence of contaminants in the environment near nuclear facilities in Canada, and support the Eastern Athabasca Regional Monitoring Program which serves a similar function for northern Saskatchewan. The CNSC's IEMP has sampled the environment near all operating uranium mines and mills, in addition to other Saskatchewan areas such as Cluff Lake and Uranium City. IEMP results are made public, and results from sampling near Saskatchewan sites have all been within expectations.

II. Is regulatory responsibility delegated, and if so, to who;

The CNSC is the primary regulator responsible for regulatory oversight of CNSC licensees. As mentioned above, CNSC staff work with provincial and other federal departments to ensure all aspects of the facility is following regulatory requirements, but the CNSC does not delegate regulatory responsibilities.

The CNSC does collaborate with the Province of Saskatchewan on the evaluation of decommissioning plans and the acceptance of financial guarantees, and uniquely it is the Province of Saskatchewan who keeps financial guarantees for uranium mines and mills in Saskatchewan. This is not a delegation as both parties independently evaluate licensee information and both parties independently accept the amount and form of the financial guarantee.

b. where are the records of monitoring kept;

- I. in a central government-controlled and maintained repository; or**
- II. in the individual files of assigned regulators; or**
- III. by the license holders doing the monitoring;**

The CNSC receives effluent and environmental data from the uranium mines and mills licensees through quarterly environment reports and annual compliance reports. This data is transcribed into Excel spreadsheets and are stored in the CNSC's record storage system.

~~Additionally~~ In addition to the CNSC's storage of this data, the licensee is required to keep their effluent and environmental monitoring data on file. Clause 7.5.2 of CSA N288.0-22 *Environmental management of nuclear facilities: Common requirements of the CSA N288 series of standards*

requires licensees to retain records of sample location, collection date, and the results of the analysis. Clause 7.5.3 of CSA N288.0-22 requires licensees to retain the records during the life cycle of the facility. To meet these requirements, licensees have database software that stores all of their effluent and environmental monitoring data. CNSC staff review the licensee's database during compliance inspections to ensure that records are properly kept and maintained.

c. are monitoring records publicly available and what is the process to access these records?

For the uranium mines and mills, the CNSC posts the total annual radionuclides released to the environment on the CNSC's Open Government portal:

<https://open.canada.ca/data/dataset/6ed50cd9-0d8c-471b-a5f6-26088298870e>

The licensee's annual compliance reports provide effluent and environmental monitoring data. These reports can be requested from the licensee's website and may be released at licensee discretion.

3. Enforcement:

a. enforcement of standards for pursuant to licenses and permits;

I. who is the enforcing authority;

CNSC enforces all requirements, including regulatory documents and accredited standards, that form part of the CNSC licensing basis for a given site. The licensing basis can evolve over time and is documented via the LCH, which documents in-force versions of licensee programs, CNSC REGDOCs, or relevant standards such as CSA standards. The Saskatchewan Ministry of Environment enforces all requirements found in provincial permits.

II. is the authority for enforcement delegated and to who;

CNSC maintains all authority for enforcement to requirements related to the *Nuclear Safety and Control Act*, its regulations, and licensing basis documents such as applicable codes and standards. This authority is not delegated by the CNSC. The Saskatchewan Ministry of Environment enforces requirements in the provincial regulations related to environmental protection, as well as all requirements from provincial permits.

III. what are the penalties for non-compliance by a license holder;

Penalties range from issuing Notices of Non-Compliance (NNCs) for small, or infrequent "one-off" situations that do not have any lasting impact on the environment, health, or safety, to more severe penalties such as orders, Administrative Money Penalties (AMPs), or even the amendment of a licence. All instances of NNCs and other penalties are tracked to completion by CNSC staff and must be adequately addressed by the licensee, with increased regulatory scrutiny provided once an area of concern is identified.

IV. please provide examples of any penalties applied against a license holder and what the amount of those penalties

Orders have been placed on Cameco's Cigar Lake Operation and Rabbit Lake Operation where certain works related to identified non-compliances were ordered to stop until the issues identified were rectified. An AMP totaling \$3,310 was issued to Cameco for failure to notify the CNSC for failing to implement the CSA N393-13 fire protection standard at its northern Saskatchewan facilities on the agreed timeline. The dollar amount of this AMP is on the lower end; however, it is in proportion to the risks of the infraction and as the first AMP ever issued to Cameco, it has been effective in promoting a strong and positive response from Cameco. For more serious offences under the NSCA, fines can be issued or prosecution and imprisonment sought.

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Froess, Ryan](#); [Way, Jessica](#); [alfred.dawatsare@erfn.net](#); [cheyenna.hunt@desnedhe.com](#); [jenny.wolverine@erfn.net](#); [nvp.mike@sasktel.net](#); [bnatomagan@kineepik.ca](#); [glenmccallum@mns.work](#); [blaroque@mns.work](#); [rsmith@mns.work](#); [sfladager@mns.work](#); [aspriggs@mns.work](#); [mbrunet@mns.work](#); [garrett.schmidt@yathinene.com](#); [shea.shirley@yathinene.com](#); [dana.kellett@yathinene.com](#); [bruce.hanbidge@yathinene.com](#); [kevin.mercredi@outlook.com](#); [b-tsannie@hotmail.com](#); [csayazie@hotmail.com](#); [d.powder.nhsr@sasktel.net](#); [d.classen@sasktel.net](#); [claire_larock@hotmail.com](#); [chief1@birchnarrows.ca](#); [andrew@tamarackenvironmental.ca](#); [trevor.moberly@birchnarrows.ca](#); [robert.sylvester@birchnarrows.ca](#); [kimsylvestre@birchnarrows.ca](#); [conrad.sylvester@birchnarrows.ca](#); [terrie.campbell@birchnarrows.ca](#); [douglas.barks@birchnarrows.ca](#); [norma.catarat@brdn.ca](#); [receptionist@mltc.net](#); [tmerasty@pbcn.ca](#); [bmerasty@pbcn.ca](#); [patti@mccunn-miller.com](#); [cbeatty@pbcn.ca](#); [skmerasty@pbcn.ca](#); [cagnew@lgl.com](#); [tcooksearson@llrib.ca](#); [ty.roberts@llrib.ca](#); [ashley.carlson@llrib.ca](#); [gchristiansen@llrib.ca](#); [jtsanniejr@pagc.net](#); [rmcleod@pagc.net](#); [hklein@twoworldsconsulting.com](#); [jswitzer@denisonmines.com](#); [cinglismcquay@denisonmines.com](#); [scoupland.sgcresearch@gmail.com](#); [mirmirans@cna.ca](#); [Bruce Hanbidge](#); [Dennis Sherratt](#); [jessielacosta2017@gmail.com](#); [Damien Georges](#); [Gorzkowski](#); [Konrad](#); [Kwamena](#); [Nana-Owusua](#); [Burton, Patrick](#); [Takala, Torin](#); [Paul James](#); [Noakes](#); [Rain](#); [McKeown](#); [Justin](#); [Nickolet](#); [Sydney](#); [Chani Campbell](#); [Janna Switzer](#); [Brienne England](#); [Carolanne Inglis-McQuay](#); [Executive Secretary](#); [Margaret Rosling](#); [alfred.dawatsare@erfn.net](#); [Brienne England](#); [Kwamena](#); [Nana-Owusua](#); [Frigault, Nicole](#);

Bcc:

Subject: CNSC Wheeler River December 2024 EA Update - Accepted Final EIS

Sent: 2024-12-24 11:28:00 AM

Hi Everyone,

In our last update, we noted the completion of the technical review of Denison Mines Corp.'s (Denison) responses to outstanding Information Requests (IRs) for the Wheeler River environmental impacts statement (EIS). This update had also indicated that on November 22nd Denison submitted a final EIS package.

Following a 30 day review, the Canadian Nuclear Safety Commission (CNSC) has accepted the final EIS. This acceptance follows a comprehensive EIS technical review process by the Federal Indigenous Review Team (FIRT), including consultations with Indigenous Nations and communities

and members of the public. CNSC staff will now proceed with the preparation of the *Canadian Environmental Assessment Act, 2012* Environmental Assessment (EA) Report, which will be made available, along with a Commission Member Document, for review by Indigenous Nations and communities and the public prior to a public Commission hearing.

The following documents have now been posted to the Canadian Impact Assessment Registry (CIAR) for this project:

- [Letter: CNSC to Denison - Wheeler Project - Acceptance of the Final EIS and Supporting Documents](#)
- [Final environmental Impact Statement](#)
- [Combined Final EIS Appendices](#)
- [Commitments Register Version 5 - Wheeler River Final EIS Submission](#)

With these conclusions, along with the sufficient licence application, CNSC staff will notify CNSC Commission Registrar of this acceptance, who will proceed with scheduling public hearing dates. Further details regarding how to participate will be provided once the Commission Secretariat has announced the hearing dates. In early January, notifications will be sent to Indigenous Nations and communities with detailed next steps in the consultation process.

Additional information can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnsccsn.gc.ca

Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

From: [Way, Jessica](#)
To: garrett.schmidt@yathinene.com (garrett.schmidt@yathinene.com)
Cc: [Levine, Adam](#); [Burton, Patrick](#); [Way, Jessica](#); [Froess, Ryan](#); [Duhaime, Brenda](#); [Gorzowski, Konrad](#); [Noakes, Rain](#); [Zenobj, Adam](#); [Wheeler River Project - Projet de Wheeler River](#); [McKeown, Justin](#); [Kwamena, Nana-Owusua](#); [Katherine Hay](#); csayazie@hotmail.com; r_augier@hotmail.com; b-tsannie@hotmail.com;
Subject: Next Steps of Consultation with YNLR - Proposed Wheeler River Project
Sent: 2025-01-22 6:57:40 PM

Dear Garrett,

I am sending the attached letter on behalf of the CNSC, outlining proposed next steps of the CNSC's consultation process with Ya'thi Néné Lands and Resources for the Wheeler River regulatory review process.

We look forward to hearing back from you and setting up a meeting to discuss further.

Sincerely,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsccsn.cg.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.



CIAR NO.: 80178

e-Doc: 7448327

January 22, 2025

Mr. Garrett Schmidt
Ya'thi Néné Lands and Resources
Saskatoon, Saskatchewan
garrett.schmidt@yathinene.com

Subject: Proposed Next Steps of Consultation with Ya'thi Néné Lands and Resources for the Remaining Steps of the Regulatory Review Process for the Proposed Wheeler River Project

Dear Mr. Schmidt:

The purpose of this letter is to provide an update and share a proposed consultation approach with Ya'thi Néné Lands and Resources (YNLR) on the remaining steps of the regulatory review process for Denison Mines Corp.'s (Denison) proposed Wheeler River Project (the Project).

Current Status of the Process of the federal Environmental Assessment

On December 24, 2024, the federal review of Denison's Environmental Impact Statement (EIS) concluded, and the Final EIS was accepted by CNSC staff as it meets the requirements of the *Canadian Environmental Assessment Act*, 2012 (CEAA, 2012). As communicated in CNSC's December 24th, 2024 email to the project distribution list for the project, the documents can be found on the [Canadian Impact Assessment Registry \(the Registry\)](#).

CNSC staff have reviewed the responses Denison provided to comments that were received during the public comment period on the draft EIS in 2023, including those from YNLR. The comments and Denison's responses are now [available on the Registry](#). CNSC staff have also drafted responses to comments that were applicable to CNSC's oversight and responsibilities and look forward to further discussing these as part of our proposed next steps as described below. CNSC's responses to these comments can also be [found on the Registry](#).

Proposed Next Steps of Consultation

Building on the ongoing consultation, relationship building, and engagement that began in 2019 between YNLR and CNSC in relation to the Project, CNSC staff provide the consultation approach as outlined in Appendix 1. Table 1 of this letter details the suggested consultation and collaboration activities for the remaining steps of the regulatory review process for the Project.

The CNSC staff will be preparing the following reports and documents to support staff's recommendations to the Commission:

- **An EA Report** which provides information and analysis to assist the Commission in its determination on whether the proposed project is likely to cause significant adverse environmental effects.
- **A Consultation Report** which will include an assessment of the Project's potential impacts to the Rights and interests of select Indigenous Nations and communities as well as recommendations regarding the Duty to Consult and Accommodate.
- **A Commission Member Document (CMD)** which presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation.

CNSC staff are interested in collaborating with YNLR to ensure that YNLR's perspectives, issues and concerns, Indigenous Knowledge and Land use information, potential impacts of the proposed Project on YNLR rights, and other topics of interest to YNLR are properly reflected in CNSC staff's reports and recommendations. This would involve CNSC staff developing the content as a first step based on information that YNLR has submitted and provided to date to the CNSC and Denison and then sharing the draft content with YNLR representatives for their review and comment. CNSC staff will be providing detailed timelines on the remainder of the regulatory process once a Commission hearing date has been identified by the Commission Registry.

The activities outlined in the proposed consultation approach are flexible, and CNSC staff would like to discuss these remaining steps of the regulatory review process with YNLR. Some potential topics for discussion include:

- review of, and input to the CNSC's assessment of the Project's potential impacts on YNLR rights and interests
- review of sections of CNSC's Consultation Report specifically related to information on YNLR community member perspectives, knowledge, land use, concerns, and rights
- awarding funding through the CNSC's PFP to support the review of CNSC's reports and consultation and engagement with the CNSC
- discussions and collaboration with the CNSC and Denison, as appropriate, regarding potential commitments, mitigations and accommodations to address potential impacts on YNLR's rights and interests
- participation in the Commission hearing process through interventions as well as collaboration on the inclusion of YNLR's cultural practices and protocols as part of the Commission hearing process, as appropriate
- discussions on the assessment and overall evaluation of Denison's engagement activities with YNLR as per REGDOC 3.2.2: Indigenous Engagement
- discussion and collaboration with the CNSC on conclusions and recommendations related to topics of concern and interest to YNLR

CNSC staff are committed to continued collaboration with YNLR to ensure that the consultation for the Project is meaningful, addresses YNLR's concerns, protects your Nation's rights and interests,

and upholds the Honour of the Crown. To discuss any matters related to the regulatory review process of the Project, please contact:

- Jes Way, Environmental Review Officer, Wheeler River EA Lead
Email: jessica.way@cnscccsn.gc.ca
- Ryan Froess, Senior Advisor, Indigenous Consultation and Engagement Division
Email: ryan.froess@cnscccsn.gc.ca

Please review the proposed consultation process for the remaining steps of the regulatory review process for the Wheeler River Project (Appendix 1) and **provide any feedback by February 17, 2025 or we would be happy to set up a meeting to discuss.**

The CNSC looks forward to continuing to build a long-term relationship with YNLR and working together throughout the regulatory review process for the proposed Wheeler River Project.

Yours sincerely,



Nana Kwamena
Director
Environmental Review Division
Canadian Nuclear Safety Commission



Justin McKeown
A/ Team Leader, Western & Northern Regions
Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission

c.c./c.c. : CNSC: A. Levine, P. Burton, J. Way, R. Froess, B. Duhaime, K. Gorzkowski, R. Noakes, A. Zenobi
YNLR: B. Tsannie, C. Sayazie, R. Augier, K. Hay

Enclosure: (1) Proposed consultation process with Ya'thi Néné Lands and Resources for the regulatory review process of the Wheeler River Project

References:

- [1] CNSC, Regulatory Guide, *REGDOC- 3.2.2: Indigenous Engagement*, Version 1.2, February 2022, <https://www.cnscccsn.gc.ca/eng/acts-and-regulations/regulatory-documents/published/html/regdoc3-2-2-v1-2/>
- [2] CNSC, *Generic Guidelines for the Preparation of an Environmental Impact Statement*, May 2016, <http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>

Appendix 1

Proposed Consultation Process with Ya'thi Néné Lands and Resources for the Remaining Steps of the Regulatory Review Process of the Wheeler River Project

1. Introduction

These proposed next steps in the consultation process, which started in 2019, are intended to guide federal Crown consultation activities (led by the CNSC) with Ya'thi Néné Lands and Resources (YNLR) during the remaining steps of the regulatory review process of the Wheeler River Project (the Project). They communicate the federal CNSC's objectives for consultation, the proposed structure for integrating consultation into the regulatory review process, and the proposed activities in which the CNSC and YNLR can work together to address YNLR's concerns regarding the Project.

2. CNSC's Consultation Objectives

- To continue the establishment of a positive and productive working relationship with YNLR during the remaining steps of the regulatory review process.
- To communicate with YNLR about the Project and developments during the regulatory review process in a timely manner.
- To establish how YNLR would like to be consulted during the remaining steps of the regulatory review process and establish a flexible and responsive consultation approach that is consistent with the consultation approach to date.
- To work with YNLR to continue to:
 1. identify any potential environmental effects of the Project, including those on current use of lands and resources for traditional purposes, health and socio-economic conditions, and heritage resources
 2. identify adverse impacts of the Project on your community's potential or established rights
 3. ensure options for avoiding, mitigating, or accommodating adverse impacts are considered
- To work with YNLR and the proponent to respond to specific questions and requests regarding issues raised related to the Project.
- To listen to and understand the concerns raised, and consider the feedback, perspectives, and issues raised by YNLR in order to inform decision-making.
- To collaborate with YNLR and the proponent to identify any potential commitments, mitigations, accommodations and conditions to address YNLR's concerns regarding any potential impacts on YNLR's rights and interests as a result of the proposed project.

3. Integrating Consultation into the Regulatory Review Process

Table 1 provides a description of the main remaining steps in the regulatory review process and a description of how the CNSC proposes to integrate consultation activities into those steps. This table describes what YNLR should receive, have access to, or expect from the CNSC, on behalf of the federal Crown, and what YNLR could share and provide to the regulatory review process.

Table 1: Integrating Consultation into the Remaining Steps of the Regulatory Review Process¹

Regulatory Review Step²	Description of Activities³	What YNLR should receive, have access to, or expect from the federal Crown	Information YNLR may want to consider providing to the federal Crown, and ways YNLR may want to participate
Project Description Review and Scoping Decision (Completed in 2019-20)	<ul style="list-style-type: none"> • Opportunity for YNLR to provide comments on the Project Description – Completed 	<ul style="list-style-type: none"> • CNSC notification to YNLR of the project and project description review process – Completed • PFP offering – Completed • Early information sharing and offers of consultation meetings – Completed 	<ul style="list-style-type: none"> • Provide comments on the project description – Completed

¹ Adapted from a template developed by the Canadian Environmental Assessment Agency (CEAA) (CEAA references the BC First Nations Environmental Assessment Technical Working Group Toolkit Workshop as a basis for this document).

² Any updates to dates related to the regulatory review process will be communicated to YNLR.

³ Denison's activities during this step of the regulatory review process are not specifically steps of the regulatory review process, but these are expectations of Denison, by CNSC staff.

Regulatory Review Step ²	Description of Activities ³	What YNLR should receive, have access to, or expect from the federal Crown	Information YNLR may want to consider providing to the federal Crown, and ways YNLR may want to participate
Environmental Impact Statement (EIS) Review <i>(Initiated 2022 – complete as of December 24, 2024)</i>	<ul style="list-style-type: none"> • Opportunity for YNLR to provide comments on draft EIS – Completed • Denison to revise documentation to address comments and concerns raised by YNLR - Completed • Denison expected to discuss with YNLR how their comments and concerns have been addressed. - Completed 	<ul style="list-style-type: none"> • Opportunity to provide feedback to the Crown on adequacy of Denison's responses to YNLR's comments and concerns. - Completed • Opportunity to participate in technical discussions with CNSC staff regarding YNLR's outstanding comments and concerns, as well as other discussions as necessary (e.g. teleconferences and/or meetings with Chief and Council, community open houses). - Completed • Opportunity to discuss how to integrate Traditional Knowledge and Land Use (TKLUS) information into the remaining steps of the regulatory review process. - Completed • Opportunity for direct and continued discussions between YNLR and the CNSC. - Completed 	<ul style="list-style-type: none"> • Provide YNLR's views on the accuracy of Denison's information about issues YNLR have raised and on any proposed ways of addressing those impacts. - Completed • Provide feedback on the adequacy of Denison's responses to YNLR's comments and concerns. - Completed • Participate in technical discussions with CNSC staff to address YNLR's outstanding comments and concerns. - Completed

Regulatory Review Step ²	Description of Activities ³	What YNLR should receive, have access to, or expect from the federal Crown	Information YNLR may want to consider providing to the federal Crown, and ways YNLR may want to participate
<p>Development of draft Consultation Report</p> <p><i>(Current phase – 2025)</i></p>	<ul style="list-style-type: none"> The CNSC's Consultation Report also includes a summary of consultation with Indigenous Nations and communities, potential impacts to potential or established rights of Indigenous Nations and communities, views and concerns expressed by Indigenous Nations and communities and the CNSC's response to those concerns, and including potential mitigation and accommodation measures, and commitments and conditions to address those concerns. The CNSC's goal is to work towards a consensus on the key issues and concerns in relation to the proposed project with YNLR. 	<ul style="list-style-type: none"> Opportunity to review and comment on sections of the draft Consultation Report specific to YNLR such as Indigenous Knowledge and Land Use information, potential impacts of the Project on YNLR's rights and interests, and concerns expressed. <ul style="list-style-type: none"> CNSC staff writing the draft sections and providing to YNLR for review and comment for consideration and/or inclusion. The objective is to obtain mutually agreed upon text, between CNSC staff and YNLR (as noted in the next step, where YNLR has diverging views with CNSC staff's analysis and findings, these will be reflected in the Consultation Report, and we also invite YNLR to capture this information in their written and/or oral intervention to the Commission). 	<ul style="list-style-type: none"> Review and provide comment on sections of the draft Consultation Report specific to YNLR.

<p>EA Report, Consultation Report and Licensing CMD Review</p> <p>AND</p> <p>Commission Public Hearings</p> <p><i>(Hearing date 2025 –2026 TBD)</i></p>	<ul style="list-style-type: none"> • The EA Report presents the CNSC staff's evaluation on the findings of the EA, including conclusions and recommendations regarding the adverse environmental effects that are likely to result from the project, appropriate measures that would mitigate those effects, the significance of residual effects after implementation of the mitigation measures, as well as the components of the follow-up and monitoring program. • CNSC staff will submit and make publicly available, for review, the Final EA Report, Consultation Report, and licensing CMD in advance of public hearings (timing to be determined by CNSC Registry). • The licensing CMD presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation. • The Commission will hold public hearings with opportunities for public and Indigenous Nations and communities to submit oral and/or written interventions. CNSC staff and the Registry are open to working with YNLR to 	<ul style="list-style-type: none"> • Opportunity to review the Final EA Report, Consultation Report, and licensing CMD to inform oral and/or written interventions. 	<ul style="list-style-type: none"> • Present YNLR's views to the Commission by providing information orally and/or in writing. • It is recommended that any diverging views with CNSC staff's analysis and findings in the CNSC's reports be captured in YNLR's written and/or oral intervention to the Commission, if required.
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Regulatory Review Step ²	Description of Activities ³	What YNLR should receive, have access to, or expect from the federal Crown	Information YNLR may want to consider providing to the federal Crown, and ways YNLR may want to participate
	ensure that the Commission hearings include and reflect YNLR's cultural protocols and processes.		
Commission's EA and Licensing Decisions (Future phase - TBD)	<ul style="list-style-type: none"> The Commission considers the EA Report, Consultation Report, CMD and interventions from the public and Indigenous Nations and communities and determines whether, taking into account the mitigation measures, conditions, accommodations and commitments proposed, the Project is likely to cause significant adverse environmental effects and if the duty to consult and accommodate was met. Should the Commission issue an EA decision statement allowing the Project to proceed, the Commission will also include legally binding conditions with which Denison must comply to implement appropriate mitigation measures and a follow-up and monitoring program. 	<ul style="list-style-type: none"> Notification and sharing of the Commission's Detailed Record of Decisions (EA and licensing). Meetings with YNLR to discuss the Commission's decision and next steps for ongoing engagement and collaboration. 	<ul style="list-style-type: none"> Feedback on preferred approach to ongoing engagement, information sharing, oversight, monitoring, reporting and collaboration.

From: [Garrett Schmidt](#)
To: [Way, Jessica](#)
[Levine, Adam](#); [Burton, Patrick](#); [Froess, Ryan](#); [Duhaime, Brenda](#); [Gorzowski, Konrad](#); [Noakes, Rain](#); [Zenobi, Adam](#); [Wheeler River Project - Projet de Wheeler River](#); [McKeown, Justin](#); [Kwamena, Nana-Owusua](#); [Katherine Hay](#); [csayazie@hotmail.com](#); [r_augier@hotmail.com](#); [b-tsannie@hotmail.com](#); [Bruce Hanbidge](#); [Dennis Sherratt](#); [Paul James](#); Dana Kellett;
Cc:
Subject: RE: EXTERNAL: Next Steps of Consultation with YNLR - Proposed Wheeler River Project
Sent: 2025-01-23 9:01:06 AM

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE

Jessica,

We've received the letter. Thanks. We will review, discuss and be in touch on a future meeting date.

Regards,

Garrett Schmidt

Executive Director

Ya'thi Néné Land and Resource Office

M: 306-370-3358

E: garrett.schmidt@yathinene.com

From: Way, Jessica <jessica.way@cnscccsn.gc.ca>

Sent: January 22, 2025 5:57 PM

To: Garrett Schmidt <garrett.schmidt@yathinene.com>

Cc: Levine, Adam <Adam.Levine@cnscccsn.gc.ca>; Burton, Patrick <Patrick.Burton@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Duhaime, Brenda <brenda.duhaime@cnscccsn.gc.ca>; Gorzkowski, Konrad <konrad.gorzkowski@cnscccsn.gc.ca>; Noakes, Rain <rain.noakes@cnscccsn.gc.ca>; Zenobi, Adam <adam.zenobi@cnscccsn.gc.ca>; Wheeler River Project - Projet de Wheeler River <WheelerRiver@cnscccsn.gc.ca>; McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Kwamena, Nana-Owusua <Nana-Owusua.Kwamena@cnscccsn.gc.ca>; Katherine Hay <katherine.hay@yathinene.com>; csayazie@hotmail.com; r_augier@hotmail.com; b-tsannie@hotmail.com

Subject: EXTERNAL: Next Steps of Consultation with YNLR - Proposed Wheeler River Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Garrett,

I am sending the attached letter on behalf of the CNSC, outlining proposed next steps of the CNSC's consultation process with Ya'thi Néné Lands and Resources for the Wheeler River regulatory review process.

We look forward to hearing back from you and setting up a meeting to discuss further.

Sincerely,

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Officer / Agente d'examen environnementale

From: [Wheeler River Project - Projet de Wheeler River](#) on behalf of [Wheeler River Project - Projet de Wheeler River](#)

To: [Wheeler River Project - Projet de Wheeler River](#)

Cc: [Boser, Sydney; Way, Jessica;](#)
[alfred.dawatsare@erfn.net; cheyenna.hunt@desnedhe.com;](#)
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[mbrunet@mns.work; garrett.schmidt@yathinene.com;](#)
[shea.shirley@yathinene.com; dana.kellett@yathinene.com;](#)
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[trevor.moberly@birchnarrows.ca; robert.sylvester@birchnarrows.ca;](#)
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[norma.catarat@brdn.ca; receptionist@mltc.net; tmerasty@pbcn.ca;](#)
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[skmerasty@pbcn.ca; cagnew@lgl.com; tcooksearson@lrib.ca;](#)
[ty.roberts@lrib.ca; ashley.carlson@lrib.ca; gchristiansen@lrib.ca;](#)
[jtsanniejr@pagc.net; rmcleod@pagc.net;](#)
[hklein@twoworldsconsulting.com; jswitzer@denisonmines.com;](#)
[cinglismcquay@denisonmines.com; scoupland.sgcresearch@gmail.com;](#)
[mirmirans@cna.ca; Bruce Hanbidge; Dennis Sherratt;](#)
[jessielacosta2017@gmail.com; Damien Georges; Gorzkowski, Konrad;](#)
[Kwamena, Nana-Owusua; Burton, Patrick; Takala, Torin; Paul James; Noakes,](#)
[Rain; McKeown, Justin; Boser, Sydney; Chani Campbell; Janna Switzer;](#)
[Brienne England; Carolanne Inglis-McQuay; Executive Secretary; Margaret](#)
[Rosling; alfred.dawatsare@erfn.net; Brienne England; Kwamena, Nana-](#)
[Owusua; aj_wilson; Duhaime, Brenda; Trieneke Gastmeier; Ryan Smith;](#)
[Keegan McGrath;](#)

Bcc:

Subject: CNSC Wheeler River March 2025 EA Update - Hearing Dates and Participant Funding

Sent: 2025-03-06 8:24:00 PM

Hi Everyone,

On February 27, 2025, the Canadian Nuclear Safety Commission (CNSC) announced hearing dates for a public hearing on Denison Mines Corporation's licence application to prepare a site for and construct its Wheeler River mine and mill project. The hearing will also consider the Environmental Assessment, which is being conducted under the *Canadian Environmental Assessment Act*, 2012.

The two part hearing will be held as follows:

Part 1:

- Date: October 8, 2025
- Place: To be determined (National Capital Region and/or virtually via zoom)
- Time: As set by the agenda to be published prior to the hearing date

Part 2:

- Date: Week of December 8, 2025
- Place: To be determined (Saskatoon)
- Time: As set by the agenda to be published prior to the hearing date

More information can be found in the CNSC's public notice here: <https://api.cnscccsn.gc.ca/dms/digital-medias/Notice-of-Public-Hearing-and-Participant-Funding-2025-H-09.pdf/object>

Also, a reminder if you are planning to apply, **participant funding applications are due on April 4, 2025.**

Additional information about the Wheeler River EA process can be found on the Canadian Impact Assessment Registry (CIAR Reference: 80178) page for this project: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

If you have any questions about this or anything else related to the EA process for this project, please don't hesitate to let us know.

Regards,

The CNSC Wheeler River Project Team

Email: WheelerRiver@cnscccsn.gc.ca

Web: [Wheeler River Project \(iaac-aeic.gc.ca\)](#).

From: [Way, Jessica](#)
To: garrett.schmidt@yathinene.com (garrett.schmidt@yathinene.com); [Bruce Hanbidge](#); [Dennis Sherratt](#); [Paul James](#);
Cc: [Takala, Torin](#); [Boser, Sydney](#); [Froess, Ryan](#); [Noakes, Rain](#); [McKeown, Justin](#); [Way, Jessica](#);
Subject: 2025-02-27-YNLR-CNSC Meeting Minutes - Wheeler River Project
Sent: 2025-03-10 3:04:18 PM

Hi Garrett, Bruce and team,

Attached is the presentation we provided during our meeting on Feb 27th, along with some minutes below.

See you later this week.

Thanks,
Jes

Title: Wheeler River – Meeting with YNLR

Date: February 27th, 2025 (1-2:30 SK time)

Participants:

- **CNSC:** Jes Way, Torin Takala, Sydney Boser, Ryan Froess, Rain Noakes
- **YNLR:** Bruce Hanbidge, Dennis Sherratt, Garrett Schmidt, Paul James

Summary:

1. Update on Denison File

- CNSC provided an update on the Denison file, including the acceptance of the Final Environmental Impact Statement (EIS) on December 24, 2024.
- Although hearing dates have not been officially announced by Registrar, they are expected to be October 8 (**Part 1** - virtual) and December 8 (**Part 2** - in-person in Saskatoon, 3 days).
- Participant funding has been announced: [Participant funding for Denison's Wheeler River Project](#) and hearing details to soon be posted (have since been posted here: [Notice of Public Hearing and Participant Funding - 2025-H-09](#))

3. Hearing Dates and Participation Funding

- The structure of the hearing was explained: part one will be presentations from CNSC and Denison, and part two will include interventions.
- Documentation will be posted mid-August for review.
- The participant funding deadline is April 4, with extensions available if needed (please let us know ahead of time)
- Documents to be reviewed by the commission include the EA report, CMD, and Consultation report.

- When applying for PFP, YNLR should include reviews of YNLR related information in CNSC documentation to the Commission, reviews of the EA and Consultation reports and CMD, prior to the hearing, as well as their intervention.
- CNSC invited questions on PFP before the April 4 deadline.

5. Licensing Process and Provincial Decisions

- YNLR has questions about the licensing process and its differences from the Federal and Provincial environmental assessments (EA).
- A follow-up meeting was suggested to provide more details on licensing, or a presentation via email could provide some context and we can start there.

6. Rights Impact Assessment and Consultation Report (Presentation) – attached

- The presentation highlighted:
 - The objectives and criteria for conducting a rights impact assessment.
 - The importance of Indigenous Nations' participation in the process.
 - Process and Timelines for the Rights Impact Assessment and the need for Indigenous Nations' input.
- Reports and Recommendations for Commission Review:
 - The EA Report involves technical experts from various federal agencies and assesses the project's potential impacts.
 - The consultation report includes all consultation activities and feedback from different Nations the CNSC has been consulting with in northern Saskatchewan.
- Clarifications and Adjustments:
 - The timelines provided in the presentation were preliminary but the actual hearing date is sooner than planned, and these will likely need to be modified.
 - CNSC is planning to provide YNLR-five to six weeks for review; documents have to be finalized before summer, as they go for internal management reviews in June.
 - YNLR asked whether a federal election would impact timelines and CNSC indicated it should not affect the process.
- EA and CMD Timelines:
 - The EA and CMD timelines will be similar to the RIA timelines, with all documents posted together.
 - An overview will be presented to the board to keep them informed about the next steps.

11. Addressing Unresolved Issues

- YNLR has concerns about unresolved issues in the EIS, specifically regarding selenium content-and wondered how the EIS was accepted by CNSC. Denison provided supplementary submissions in appendices, which may reflect additional information that CNSC staff reviewed in making their conclusions. CNSC to provide some additional references and if there are other questions, invites YNLR to provide and we will dig up that information. CNSC also offered to invite subject matter experts to address specific questions and concerns as we have in the past.
- Final EIS submission may require additional organization on the Registry. Some commitments may be documented in track-changes versions of documents, and experts can be brought in to address specific concerns.

12. Upcoming meetings

- CNSC noted that there will likely be a need for more frequent meetings, in order to work through the RIAs and discuss outstanding technical concerns rapidly.
- There is currently a meeting scheduled for March 13, this could be used to discuss outstanding issues and provide clarification.
- CNSC wondered if we should cancel and keep the update the board in the March 12th meeting instead; Garrett indicated he would like to keep these technical meetings separate. [Given further discussion after the meeting, it was agreed to cancel the meeting on the 13th as Bruce is out of office]

13. Midwest Project and Consultation Requirements

- YNLR had questions about the Midwest project and how an RIA would work for this project if it were reviewed. No official submission received by CNSC, but it sounds like they have moved away from the original mining method (2012) plan for open pit, and are proposing a new method. CNSC noted comparison to Darlington New Nuclear which was originally assessed under CEAA 1992; may be a need to conduct a gap analysis between the impacts of the original proposal and new proposal (to determine whether it is within the bounds of the original Environmental Assessment).
- Some discussion on Sabre technology at MacLean Lake.
- Additional consultation may be needed if the method chosen for Midwest changes, potentially triggering the duty to consult.
- The rights impact assessment is likely to be triggered through the licensing process for new projects.
- The CNSC's practices may evolve, and the rights impact assessment process may be included in more projects moving forward.

15. Provincial Environmental Assessment (EA) and Project Impacts on Rights

- The need for a provincial EA for new projects that could potentially impact rights was discussed. The example of Fission/Paladin's Patterson Lake South Project was raised, provincial EA with an CNSC-led RIA triggered in licensing.
- Existing facilities like old mines operating for 20 years are legacy projects do not require RIAs as they aren't newly proposed.

Actions and Next Steps:

- **Licensing Information:** CNSC to share a package/presentation to provide more information on CNSC's licensing process.
- **YNLR Issues and Concerns:** YNLR to share a list of outstanding issues and concerns that appear not to be resolved in the Final EIS, and CNSC can provide additional references on these topics (or schedule follow up discussions as needed)
- **SME attendance at future meetings:** CNSC to ensure that relevant SMEs are available to speak to technical issues and concerns raised by YNLR at future meetings.



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

CNSC's Indigenous and/or Treaty Rights Impact Assessment Framework

Wheeler River EA process



Overview

- Background
- Objectives and Criteria for Conducting RIAs
- CNSC's Framework
- Roles and Responsibilities
- Reports and Timelines

Background

- Rights impact assessments (RIAs) have become common place for major resource projects and major regulatory processes in Canada
- Main drivers include:
 - Government of Canada priorities, policies and directives (e.g. rights recognition and implementation framework, Principles Respecting the Government of Canada's Relationship with Indigenous Peoples, reconciliation, TRC Calls to Action)
 - Legislative (e.g. IAAC, CEAA)

Objectives

The objectives of developing a framework and policy related to the assessment of the potential impacts to Indigenous and/or Treaty rights are to ensure:

- that projects undergoing an Environmental Assessment and/or licensing processes led by the CNSC that trigger the duty to consult and accommodate consider the potential impacts on Indigenous and/or Treaty rights
- the Commission receives clear and complete information and analysis regarding potential impacts on rights with regards to their decisions
- the CNSC's approach to consultation is aligned with current and evolving requirements and expectations of the courts, legislation, and best practices and approaches across the federal government

Criteria for RIA

Conducting an RIA is appropriate when certain criteria are met:

- The project/Commission's Decision raises the Duty to Consult
- Identified Indigenous Nations and communities are actively engaged, have identified/demonstrated the exercise of Indigenous and/or treaty rights in the vicinity of the project and have identified specific concerns with regards to potential impacts from the proposed project on their rights and interests

CNSC's Framework for RIA

- CNSC is currently the Responsible Authority for 5 ongoing EAs under CEAA 2012 where the Duty to Consult has been triggered and a number of Indigenous Nations have asserted through consultation processes that their rights and interests may be potentially impacted
- CNSC staff have conducted benchmarking against existing RIA frameworks and guidance (e.g. IAAC Interim Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples)
- CNSC staff have worked from these examples to create a RIA framework that can be applied to CNSC regulatory processes and tailored to each major project and for Indigenous Nations being consulted

CNSC's Framework for RIA

- CNSC's approach to the RIA is through a *qualitative* assessment
- Qualitative approach provides a narrative-based, overview assessment on the potential impacts to Rights
- Consolidates existing project information, summarizes key issues and concerns, and considers mitigations, commitments and accommodations which address potential impacts to Rights
- Opportunity for the Indigenous Nation to provide feedback on the adequacy of mitigations, commitments and accommodations to address key concerns/potential impacts and/or provide additional mitigations or commitments that the Indigenous Nation recommends to address key concerns/potential impacts

Role of Indigenous Representatives

- Sharing information related to perspectives, issues and concerns, Indigenous Knowledge and Land use information, potential impacts of the proposed Project on rights, and other topics of interest
- Providing documented information for consideration in the RIA process, where appropriate (e.g. Indigenous Knowledge and Land Use studies)
- Participating in meetings and discussions with CNSC (and Denison or the Province of Saskatchewan, if necessary)
- Reviewing drafted content to ensure content specific to the Nation(s) is reflected accurately, within the timeframes provided (including approvals by members of leadership)

Role of Project Proponents

- The RIA process is to be conducted primarily between the Crown (CNSC) and potentially impacted Indigenous Nations and communities , however, project proponents have an important role to play throughout the EA or licensing process, where appropriate:
 - Providing data and information on the project and potential project impacts (historical context and future plans)
 - Providing information regarding proposed mitigation measures to address potential environmental effects and/or impacts on rights as well as other commitments or other measures to address concerns raised by Indigenous Nations
 - Participating in discussions around potential additional measures and commitments (e.g. accommodations) to address any identified remaining impacts on rights

Reports Produced

CNSC staff will produce the following reports that will be made public and for Commission:

- **A Commission Member Document (CMD)** which presents CNSC staff's findings, recommendations and conclusions from the technical review of Denison's licence application and supporting documentation. *Example: [Chalk River NSDF CMD \(Feb 2022\)](#) (PDF p. 1 to 181)*
- **An EA Report** which provides information and analysis to assist the Commission in its determination on whether the proposed project is likely to cause significant adverse environmental effects. *Example: [Near Surface Disposal Facility EA report \(Feb 2022\)](#) (PDF p. 182)*
- **A Consultation Report** which will include an assessment of the Project's potential impacts to the Rights and interests of select Indigenous Nations and communities as well as recommendations regarding the Duty to Consult and Accommodate. *Example: [CNSC staff's Indigenous Consultation Report for DNNP](#) (PDF p. 700)*

Timelines

Activity	Responsible	Timeframe	End Date
CNSC Drafting RIAs and other chapters of consultation report	CNSC	-	End-April
Joint meetings and correspondence with Nations on RIAs, and other report content as applicable	CNSC/Nation	~5 Weeks	End-April
Review/comment of RIA content and report sections* by the Nation	CNSC/Nation	~6 Weeks	Mid-June
CNSC Final revisions to report following feedback from Nations and communities	CNSC	~2 weeks	End-June
CNSC Internal Approvals process/translation	CNSC	TBD	TBD
Posting of Reports for Intervention process	CNSC	TBD	TBD
Hearing Part 1	CNSC	TBD	TBD
Hearing Part 2	CNSC	TBD	TBD

*This could include content from the EA report, if applicable

Questions?

From: [Boser, Sydney](#)
To: [Garrett Schmidt](#)
Cc: Dana Kellett; [Katherine Hay](#); [Way, Jessica](#); [McKeown, Justin](#);
Subject: CNSC & YNLR Documents for Review - Denison Wheeler River: Consultation Report and EERRs
Sent: 2025-04-30 5:47:00 PM

Good afternoon Garrett,

I am writing to provide you with sections of the Consultation and Environmental Assessment Reports. These documents are CNSC staff submissions that will be included in the CNSC Commission Member Document that will be presented to the Commission for the Denison Wheeler River Project hearings. There are two documents attached to this email which contain the following information:

1. Section 4.3 of the Consultation Report which outlines our consultation activities with YNLR related to the Wheeler River project. The Report contains background information on YNLR, a table with key consultation activities to date, a summary of concerns raised to date, and CNSC staff's response. This information will be publicly accessible, once published.
2. The EA Report content for review includes a "Views Expressed" sections for each topic area. As you will see from the table of contents included in the first part of the attachment, the EA report will contain sections for each topic area (ie. Atmospheric, aquatic environment, etc.), each of which will include a description of the environment, the proponents assessment, other views expressed (including how concerns were addressed), CNSC staff's analysis, followed by CNSC staff's conclusions on the significance of effects. The content attached for review includes the Views Expressed section, relevant to issues and concerns raised by YNLR related to each topic area. This information will be included in the EA report, as written and will be publicly accessible, once published.

We are asking you to review both documents for **accuracy** and to provide any comments and suggested edits as necessary. We ask that these documents are returned to us no later than **May 23rd, 2025**. Please note that if we do not receive comments by the deadline then this information will be included without YNLR's feedback. If you have any questions, please reach out to myself or Jes Way or we can set up a meeting to discuss further.

Thanks,
Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnscccsn.gc.ca

*I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory
and Homeland of the Métis*

Je reconnais que les terres sur lesquelles je vis et travaille sont le territoire traditionnel du
Traité no 6 et la patrie des Métis

Questions and Responses to YNLR on Denison from May 6th, 2025 Meeting

Agenda for CNSC's Portion:

8:00 AM – Welcome, coffee and opening prayer

8:10 AM – Review and adopt agenda and adopt previous meeting minutes (March 12, 2025)

8:30 AM – CNSC Submissions: REGDOC 3.2.2, Denison EA Review, NexGen EA Review, 2025 TOR and Workplan, Stream 1 for Kathy's position (3 years)

9:00 AM – CNSC ISR (in situ recovery) Presentation (Quinn Zheng to join virtually)

9:45 AM – BREAK

Note: the information provided below is based on the EIS prepared by Denison.

What is the grade of ore in the Wheeler River Project?

The Project proposes to use the ISR method to mine uranium from the Phoenix uranium deposit. The deposit is a high-grade (average grade 19% uranium ore concentrate (i.e., triuranium octoxide or U_3O_8) with approximately 70.2 million pounds (Mlbs) of U_3O_8 .

What is the spacing between freeze holes?

The freeze wall will be established by drilling vertical holes from surface to 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. This is based on a conceptual level design.

Waste management at the site

The Project will manage conventional, radiologically contaminated, and hazardous waste at the site. Denison proposes tailored pond, pad, and landfill liner systems with appropriate performance monitoring (e.g., leak detection, groundwater monitoring), based on the waste type:

- Non-radioactive materials: Stored in ponds/pads with a single geosynthetic composite liner. Examples of Project components proposed to have this type of liner include the industrial wastewater treatment precipitate pond, hazardous waste pad, and effluent ponds.
- Potentially radioactive materials: Stored in ponds/pads with a double geosynthetic composite liner. This design is intended to last several hundred years. Applied to areas like the wellfield runoff pond, process ponds, landfill leachate ponds, uranium bearing solution holding area, and special waste pad.

Examples of materials moved off-site for reprocessing:

- Process precipitates temporarily stored at the process precipitate pond during Operation will be transported off site to an approved facility for reprocessing and permanent disposal.
- Any mineralized core or drill cuttings remaining on the special waste pad at Decommissioning will be trucked off site to an approved facility for reprocessing and permanent disposal.

When mining solution flows through the ore body, will other elements/minerals, beside uranium, be dissolved in the solution?

Mineralogical changes in the ore zone post-mining were assessed based on laboratory test and field tests. Key findings include:

- Effective uranium leaching from the ore zone, with partial dissolution of sulphide minerals (e.g., pyrite, sphalerite, galena, etc.).
- Clay mineral dissolution occurred, indicated by elevated aluminum.
- Post-mining hydrochemistry shows elevated constituents of potential concern (COPCs), including As, Cd, Co, Cr, Cu, Mo, Ni, Se, V, Zn, etc., in uranium bearing solutions relative to baseline, reflecting mineral dissolution.

From: [Way, Jessica](#)
To: [Garrett Schmidt](#)
Cc: Dana Kellett; [Katherine Hay](#); [McKeown, Justin](#); [Boser, Sydney](#); [Bruce Hanbidge](#); [Noakes, Rain](#);
Subject: RE: EXTERNAL: For YNLR Review - Excerpt from EA report
Sent: 2025-07-02 10:55:19 AM

Good morning Garrett,

Thanks for getting back to us on this so quickly. These edits have been incorporated.

Have a good week.

Jes

From: Garrett Schmidt <garrett.schmidt@yathinene.com>
Sent: Monday, June 16, 2025 12:00 AM
To: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Cc: Dana Kellett <dana.kellett@yathinene.com>; Katherine Hay <katherine.hay@yathinene.com>; McKeown, Justin <justin.mckeown@cnsccsn.gc.ca>; Boser, Sydney <sydney.boser@cnsccsn.gc.ca>; Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Noakes, Rain <rain.noakes@cnsccsn.gc.ca>
Subject: Re: EXTERNAL: For YNLR Review - Excerpt from EA report

EXTERNAL EMAIL – USE CAUTION / COURRIEL EXTERNE – FAITES PREUVE DE PRUDENCE
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Hello Jessica,

We've been busy so I apologize for the delay in responding.

Please see the attached document which I copied and pasted into a .docx file and made some edits in track changes (redline). I've also pasted a clean copy.

Please let me know if you have any questions or comments on my edits.

Regards,

Garrett Schmidt
Executive Director
Ya'thi Néné Land and Resource Office

M: 306-370-3358
E: garrett.schmidt@yathinene.com

From: Way, Jessica <jessica.way@cnsccsn.gc.ca>
Sent: Friday, May 30, 2025 4:59 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Cc: Dana Kellett <dana.kellett@yathinene.com>; Katherine Hay <katherine.hay@yathinene.com>; McKeown, Justin <justin.mckeown@cnsccsn.gc.ca>; Boser, Sydney <sydney.boser@cnsccsn.gc.ca>; Bruce Hanbidge <bruce.hanbidge@yathinene.com>; Noakes, Rain <rain.noakes@cnsccsn.gc.ca>
Subject: EXTERNAL: For YNLR Review - Excerpt from EA report

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Garrett,

As we have been reviewing and pulling together the final elements of the EA Report, and some additional text was identified that we'd like to have YNLR review. This is information included in the *Indigenous uses: Current use of lands and resources for traditional purposes* Section of the EA report.

Athabasca Denesųliné

The Black Lake (Treaty 8), Fond du Lac (Treaty 8), and Hatchet Lake Denesųliné First Nations (Treaty 10) are collectively termed the Athabasca Denesųliné (AD) and are represented by the Ya'Thi Néné Lands and Resources Office (YNLR). Hatchet Lake Denesųliné First Nation is the closest AD First Nation to the Project and is located approximately 150 km to the northeast, downstream from the Project. YNLR asserts that Treaty Rights are practiced within the LSA, RSA and downstream in the Wheeler River in Northern Saskatchewan and that the project area overlaps the southern extent of the AD's traditional territory, in Nuhenéné. The information shared with CNSC by YNLR (in Denison's EIS and in meetings, etc.) indicates that AD members access and use the RSA for hunting, fishing, trapping and gathering activities, and that there are important cultural sites located in the RSA. Barren-ground caribou is the most important resource for the AD people and members continue to harvest barren-ground caribou for subsistence and cultural purposes. Although the barren-ground caribou herds do not travel far enough south into the Project area, YNLR also indicated that other large game species harvested in the RSA include woodland caribou, moose, and black bear, while smaller game harvested include porcupine and rabbit. Fishing harvesting also takes place primarily within the RSA, although some fishing was also present in small numbers downstream of the Project in the LSA in the Wheeler River and Keefe Lakes. Other traditional land use activities practiced by YNLR members in the RSA include the gathering of berries, medicines, firewood and overnight sites as well as historical travel routes. Current sites, such as cabins, were not documented in the PA or LSA. Camping sites and navigation routes were documented based on historic use of the LSA by the Hatchet Lake Denesųliné First Nation.

Sorry to be sending along more content after the fact, but this section came together a bit later. If you could please let us know if you have any edits before June 13th, I'd appreciate it. It's a pretty short excerpt, so I hope that two weeks is enough time to review.

Have a wonderful weekend.

Jes

Jes Way, MEnv, PMP

(she / her / elle)

Environmental Review Officer | Agente d'examen environnementale
Environmental Review Division | Division de l'examen de l'environnement
Canadian Nuclear Safety Commission | Commission canadienne de sûreté nucléaire
Jessica.Way@cnsccsn.ca | Tel: 343-540-6213
British Columbia, Core Hours: 9:30am – 5:30pm ET | 6:30am – 2:30pm PT

My work hours might not be the same as your work hours – please reply at your convenience.



22 May 2025

Ms. Sydney Boser
Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Delivered via email: sydney.boser@cnsccsn.gc.ca

Re: 30 April 2025 email, Sydney Boser to Garrett Schmidt, requesting a YNLR review/comment on the accuracy of:

- a. YNLR Consultation Report Section 4.3; and**
- b. Environmental Assessment Report: Wheeler River Project. Views expressed – for YNLR Review (August 2025)**

Dear Sydney,

The Ya'ithi Néné Lands and Resources (YNLR) staff has reviewed the requested documents for accuracy. Based on that review, YNLR's position is that the documents, as presented, are an accurate record of YNLR's comments, concerns and other statements that they have to the topic areas covered in these documents. YNLR therefore endorses the publication of these documents as they have been presented to us.

YNLR appreciated the opportunity to review these documents prior to their publication. We would like to thank the CNSC staff for their thoroughness and professionalism in the conduct of this ongoing assessment process.

Respectfully,

Garrett Schmidt
Executive Director



Cc via email:

Jessica Way, CNSC Environmental Review Officer, Environmental Review Division

Jessica.Way@cnscccsn.gc.ca

Justin McKeown, CNSC Team Lead, Indigenous Consultation and Engagement Division

Justin.Mckeown@cnscccsn.gc.ca

Dana Kellett, YNLR Manager of Environment Dana.Kellett@yathinene.com

Katherine Hay, YNLR Manager of Corporate Affairs Katherine.Hay@yathinene.com

Bruce Hanbidge, YNLR Strategic Advisor Bruce.Hanbidge@yathinene.com

Attachments:

- YNLR Consultation Report Section 4.3
- Environmental Assessment Report: Wheeler River Project. Views expressed – for YNLR Review (August 2025)

From: [Boser, Sydney](#)
To: [Garrett Schmidt](#)
Cc: [McKeown, Justin](#); [Froess, Ryan](#); [Way, Jessica](#); [Katherine Hay](#); [Dana Kellett](#);
Subject: RE: CNSC & YNLR - Issues Tracking Table - For Review: Wheeler River
Attachments: [YNLR Issues Tracking Table Appendix A.3 - For Review.docx](#)
Sent: 2025-07-17 3:38:00 PM

Good afternoon Garrett,

I just wanted to send a reminder that the deadline to provide feedback on the issues tracking table is Wednesday July 23rd.

Thank you,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnscccsn.gc.ca

I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis

Je reconnais que les terres sur lesquelles je vis et travaille sont le territoire traditionnel du Traité no 6 et la patrie des Métis

From: Boser, Sydney
Sent: June 27, 2025 2:31 PM
To: Garrett Schmidt <garrett.schmidt@yathinene.com>
Cc: McKeown, Justin <justin.mckeown@cnscccsn.gc.ca>; Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Way, Jessica <jessica.way@cnscccsn.gc.ca>; Katherine Hay <katherine.hay@yathinene.com>; Dana Kellett <dana.kellett@yathinene.com>
Subject: CNSC & YNLR - Issues Tracking Table - For Review: Wheeler River

Good afternoon Garrett,

Please see attached the YNLR's issues tracking table for the Denison Wheeler River Project for your review. This tracking table includes concerns that YNLR has raised throughout the EA process for the Project and includes CNSC's response. This table will be appended to the Consultation Report for the Project in advance of the Part 1 hearing.

Please review the document for **accuracy** and return to us no later than **July 23rd, 2025**. Please note that if we do not receive comments by the deadline then this information will be included without YNLR's feedback. If you have any questions, please reach out to myself or Ryan Froess.

Thanks,

Sydney Boser née Nickolet (she/her/elle)

Senior Policy Officer, Indigenous Consultation and Engagement Division
Canadian Nuclear Safety Commission
Email: sydney.boser@cnscccsn.gc.ca
Phone Number: 343-596-9556

Agente principale en politiques, Division de la consultation et de la mobilisation des Autochtones
Commission canadienne de sûreté nucléaire
Email: sydney.boser@cnscccsn.gc.ca

I acknowledge that the land on which I live and work is the traditional Treaty 6 Territory and Homeland of the Métis

Je reconnais que les terres sur lesquelles je vis et travaille sont le territoire traditionnel du Traité no 6 et la patrie des Métis

B.5 Key Correspondence with Métis Nation - Saskatchewan

From: Phaneuf, Marcelle (CNSC/CCSN)
'lawrence.mcintyre@erfn.net'; 'cheyenna.campbell@desnedhe.com'; 'b-tsannie@hotmail.com'; 'moniquethomas2016@gmail.com';
'pdenechezhe@gmail.com'; 'csayazie@hotmail.com';
'tlbbeavereye@hotmail.com'; 'louis.mercredi@fonddulac.ca';
'victorf@sasktel.net'; 'info@fonddulac.ca';
'Garrett.schmidt@yathinene.com'; 'Linda.mcnabb@yathinene.com';
Bcc: 'eileenmorrison62@yahoo.ca'; 'chief1@birchnarrows.ca';
'bandmanager@birchnarrows.ca'; 'nvp.glen@sasktel.net';
'mcalette@mns.work'; 'b.merasty@mns.work'; 'geraldmorin@hotmail.com';
'earl.cook@nortep.ca'; 'nvp.mike@sasktel.net';
'vince.pinehousedc@sasktel.net'; 'jtsanniejr@pagc.net';
'creemancon@gmail.com'; 'info@mltc.net'; Levine, Adam (CNSC/CCSN);
Zenobi, Adam (CNSC/CCSN); Akhter, Salman (CNSC/CCSN);
Subject: CNSC receives project description for a new in situ recovery uranium mine
Sent: 2019-04-09 11:56:00 AM

Good day,

On February 19, 2019, Denison Mines Corp. submitted a project description with the intent to develop an in situ recovery (ISR) uranium mine in the Athabasca Basin in northern Saskatchewan, 4 km west of Highway 914 and approximately 600 km north of Saskatoon.

If and when the project description is assessed by the Canadian Nuclear Safety Commission (CNSC) as complete, the next step would be to issue a notice of commencement. The project description would then become available for public comment as part of the environmental assessment process.

A formal letter of notification to your community with more information on the regulatory review process is forthcoming.

For more information on the CNSC's role in licensing uranium mines and mills, please visit:

<http://www.nuclearsafety.gc.ca/eng/uranium/mines-and-mills/index.cfm>

For more information on the CNSC's environmental assessment process, please visit:
<http://www.nuclearsafety.gc.ca/eng/resources/environmental-assessments/index.cfm>

Best regards,

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209



April 15, 2019

e-Doc: 5870914

President Glen McCallum
Métis Nation of Saskatchewan
Suite 201, 208-19th Street W
Saskatoon, SK S7M 5X8
nvp.glen@sasktel.net

Subject: Notice of Denison Mines Corp., Wheeler River Project, a Proposal for a New Uranium Mining Project in northern Saskatchewan.

Dear President McCallum:

The purpose of this letter is to provide you with notice that the Canadian Nuclear Safety Commission (CNSC) has received a project description from Denison Mines Corp. (Denison) to develop a uranium mine located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine. The proposed development is called the Wheeler River Project.

The proposed project requires a federal environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and will require authorization from the CNSC under the *Nuclear Safety and Control Act* (NSCA).

The proposed project includes underground and surface facilities to support the mining and processing of uranium ore using the In Situ Recovery (ISR) mining method. The main components of the project include:

- an ISR wellfield
- two freeze plants on the surface to establish a frozen isolated mining chamber underground
- an on-site plant to process the mining solution recovered from the ISR wellfield
- surface facilities to support the short and long term storage of waste rock
- water handling infrastructure and a water treatment plant
- additional infrastructure to support mining activities including but not limited to a camp for personnel, and supporting facilities such as an airstrip, waste and water management facilities, maintenance shops, warehouses, and offices

Vehicle access to the site would be provided by constructing a seven-kilometre section of road connecting Provincial Highway 914 to the Wheeler River site and a five-kilometre road from the site to the airstrip.

Environmental Assessment and Licensing

As part of their application, Denison will be seeking sequential EA and licensing processes such that EA and licensing matters will be considered at separate public Commission hearings. The Commission must make an EA decision that the project will not cause significant adverse environmental effects prior to making a licensing decision. Denison has submitted a project description to initiate the EA process, but has not yet submitted a full licence application to initiate the licensing process.

The proposed project will require an EA under CEAA 2012. The CNSC will be responsible for making both an EA and a licensing decision for this project. The CNSC is also the Crown Consultation Coordinator for the federal government for the project.

The proposed project is also subject to a provincial environmental assessment as it is a “development” as defined in section 2(d) of *The Environmental Assessment Act*. Therefore, Denison is also required to undertake a provincial EA for the project and seek approval from the Saskatchewan Minister of Environment prior to proceeding with the project. CNSC and the Saskatchewan Environmental Assessment & Stewardship Branch will work closely to coordinate our respective EA processes wherever possible.

Commission Hearing

Before the Commission can make a decision on the licence application, a public hearing will be held to ensure that the Commission has the information it needs, and that Denison and interveners (including Indigenous groups and members of the public) have had a reasonable opportunity to present relevant information to the Commission. The CNSC encourages your participation in the review process, including the public hearing.

The Commission’s public hearing for the Wheeler River Project has not yet been scheduled. We will provide you with an update once further details are confirmed regarding the timing, location and format of the Commission hearing for this project.

For more details on CNSC’s public hearing processes, you can visit the web link:
<http://nuclearsafety.gc.ca/eng/the-commission/hearings/participate/index.cfm>.

Participant Funding Program

The CNSC has established a Participant Funding Program (PFP) to enhance participation in the CNSC’s regulatory processes. Funding for this project will be offered in two phases. The first phase will be for the review of the draft Environmental Impact Statement, while the second phase will be for the remainder of the regulatory process. The availability of the first phase of PFP will be announced within the next few months (around the same time as the Commission makes its decision on the scope

of the EA). Once the availability of funding is announced we will provide you with further details on the application process, scope of funding and amounts available.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>

If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnsccfp@nsc.gc.ca.

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands the importance of consulting and building relationships with Canada's Indigenous peoples.

As an Indigenous group with potential interest in this project, the CNSC is interested in hearing any views you may have with respect to the project and encourages you, during the review process, to:

- advise the CNSC of any adverse impacts the project may have on your Nation's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures
- advise the CNSC of how you and your Nation would like to be consulted by the Crown as part of the regulatory review process for this project

Next Steps

Once the final project description has been submitted by Denison, CNSC staff will provide your community with further details on the federal EA process to be followed for the proposed project.

The CNSC will be posting a Notice of Commencement on the Canadian Environmental Assessment Registry within the next few weeks. At the same time as the posting of the Notice of Commencement, the CNSC will also post the project description for a 30 day review and comment period.

As part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the following documents:

- the project description
- the draft Environmental Impact Statement

Indigenous groups and members of the public will also be given the opportunity to submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation).

We are interested in meeting with your community in person, or by teleconference if preferred, to discuss the proposed project, and we would be happy to arrange for this to happen. Please note that the CNSC is also able to offer, upon request, participant funding for such meetings and other related activities to help enable your on-going participation and engagement throughout the EA and regulatory review process.

Staying Informed

The CNSC is committed to ongoing consultation and engagement with you and your Nation in relation to this proposed project and will be providing information updates directly to you at key points in the regulatory process.

In addition, if you wish to receive e-mail notifications when the CNSC's website is updated, including notices for hearings, meetings and PFP funding opportunities, you can sign-up to the CNSC mailing list by visiting the following web link and choosing the 'new subscriber' option:
<http://nuclearsafety.gc.ca/eng/stay-connected/get-involved/subscribe/index.cfm>.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact the Crown Consultation Coordinator on this file, Marcelle Phaneuf, by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,



Candida Cianci
Director, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Location of the proposed Wheeler River uranium mine project

Appendix B: Indigenous Consultation and Engagement at the CNSC (e-Doc: 5862079)

c.c.: M.Calette; B. Merasty; G. Morin; E. Cook (Métis Nation of Saskatchewan)
P. Fundarek, M. Landon, S. Akhter, M. Phaneuf, A. Levine, A. Zenobi (CNSC)
A. Sadik, B. England (SEASB)

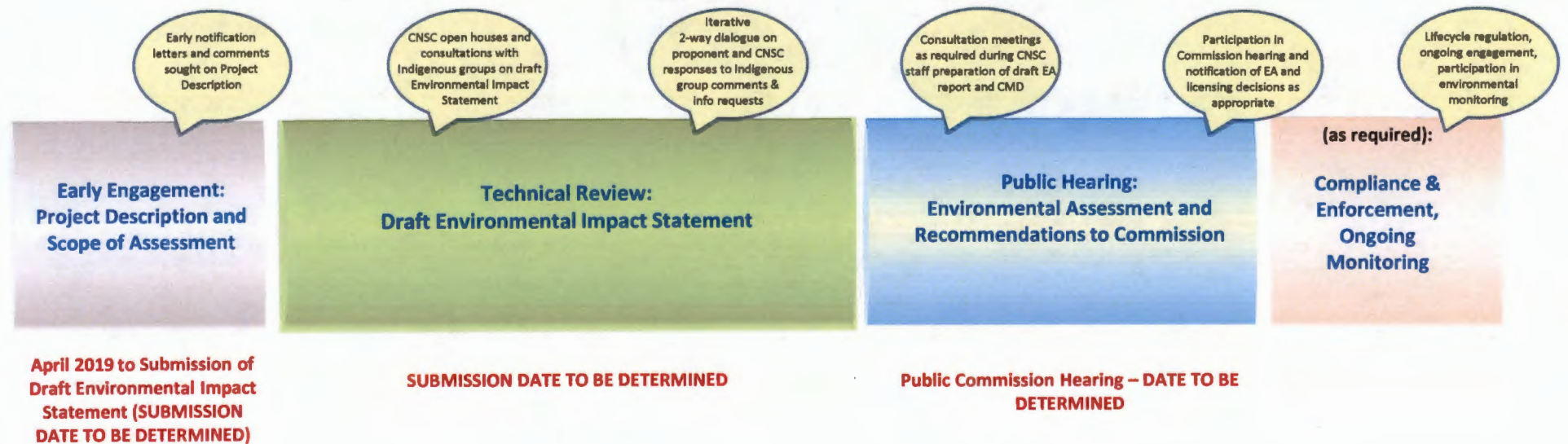
A similar letter was sent to the following groups:

- English River First Nation
- Hatchet Lake First Nation
- Birch Narrows Dene Nation
- Buffalo River Dene Nation
- Black Lake First Nation
- Fond-du-Lac Denesuline First Nation
- Ya'thi Néné Lands and Resource Office
- Prince Albert Grand Council
- Métis Nation of Saskatchewan (Northern Region 1)
- Kineepik Métis Local Pinehouse # 9 (Métis Northern Region 3)
- Meadow Lake Tribal Council

Appendix A: Location of the proposed Wheeler River uranium mine project



Appendix B: Indigenous Consultation and Engagement at the CNSC



From: Phaneuf, Marcelle (CNSC/CCSN)
'b-tsannie@hotmail.com'; 'nvp.glen@sasktel.net';
'leonardmontgrand@yahoo.ca'; 'csayazie@hotmail.com';
'louiemercredi.fdl@sasktel.net'; 'Garrett.schmidt@yathinene.com';
'chief1@birchnarrows.ca'; 'lawrence.mcintyre@erfn.net';
'receptionist@mltc.net'; 'eileenmorrison62@yahoo.ca';
To: 'nvp.mike@sasktel.net'; 'mcalette@mns.work'; 'jtsanniejr@pagc.net';
'mcalette@mns.work'; 'b.merasty@mns.work'; 'geraldmorin@hotmail.com';
'earl.cook@nortep.ca'; 'tlbbeavereye@hotmail.com';
'clhmercredi@sasktel.net'; 'victorf@sasktel.net'; 'fdlreception@sasktel.net';
'Linda.mcnabb@yathinene.com'; 'bandmanager@birchnarrows.ca';
'cheyenna.campbell@desnedhe.com'; 'vince.pinehousedc@sasktel.net';
'creemancan@gmail.com';
Subject: Public comment period on the Project Description for the proposed
Wheeler River Project – Denison Mines Corp.
Sent: 2019-05-31 4:07:00 PM

Follow Up Flag: Follow up

Flag Status: Flagged

Good afternoon,

The Canadian Nuclear Safety Commission (CNSC) is [seeking comments](#) from the public and Indigenous groups on the project description for the proposed Wheeler River Project (<https://www.ceaa.gc.ca/050/documents/p80178/130098E.pdf>).

The project involves the construction of a new uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine.

The CNSC reviewed the project description and determined that it was written in accordance with the Prescribed Information for the Description of a Designated Project Regulations. (These regulations are made under the Canadian Environmental Assessment Act, 2012). Detailed information about the project will be available in the environmental impact statement, which Denison Mines Corp., the proponent, will submit at a later stage of the environmental assessment (EA) process.

Comments on the project description should be based on local, regional or traditional knowledge of the site or surrounding environment, or provide any other relevant information that may help with the conduct of the EA. All comments received will be considered public.

Written comments must be submitted by June 30, 2019, to:

Marcelle Phaneuf, Environmental Assessment Officer

Canadian Nuclear Safety Commission
P.O. Box 1046 Station B
280 Slater Street
Ottawa ON K1P 5S9
Telephone: 613-947-3209 or 1-800-668-5284
Fax: 613-995-5086
Email: cnscc.ea-ee.ccsn@canada.ca

Following receipt of comments on the project description, CNSC staff will consider all submissions received and make recommendations to inform the Commission's decision on the scope of the factors to be considered in the EA. In addition, CNSC staff will respond to all comments received from members of the public and Indigenous groups. The comments and responses will be placed in a table and publicly posted to the Canadian Environmental Assessment Registry. Effort will be made to group common issues together.

Following the Commission's decision on the EA scope, Denison Mines Corp. will then be required to provide to the CNSC an environmental impact statement (EIS) for review. An EIS is a report that a proponent writes to present the technical studies and findings of an EA. The CNSC's Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012 (<http://www.nuclearsafety.gc.ca/eng/pdfs/Environmental-Assessments/CEAA-2012-Generic-EIS-Guidelines-eng.pdf>) provide general instructions on preparing the EIS and information that must be included in it in order to comply with CEAA 2012 requirements.

If you have any questions, please do not hesitate to contact me at marcelle.phaneuf@canada.ca or by telephone at 613-947-3209.

Kind regards,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: 'mcalette@mns.work'
Subject: Public comment period on the Project Description for the proposed Wheeler River Project – Denison Mines Corp.
Sent: 2019-06-14 3:29:00 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mark,

As discussed this morning, please find below the announcement of the public comment period for the Wheeler River project.

Best regards,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: Phaneuf, Marcelle (CNSC/CCSN)
Sent: Friday, May 31, 2019 4:08 PM
To: ...

Good afternoon,

The Canadian Nuclear Safety Commission (CNSC) is [seeking comments](#) from the public and Indigenous groups on the project description for the proposed Wheeler River Project (<https://www.ceaa.gc.ca/050/documents/p80178/130098E.pdf>).

The project involves the construction of a new uranium mining and processing operation located in the Athabasca Basin in northern Saskatchewan, approximately 600 km north of the city of Saskatoon, 4 km west of Highway 914 and midway between Cameco Corporation's Key Lake Mill and McArthur River Mine.

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Denison Mines Corp., the proponent, will submit at a later stage of the environmental assessment (EA) process.

Comments on the project description should be based on local, regional or traditional knowledge of the site or surrounding environment, or provide any other relevant information that may help with the conduct of the EA. All comments received will be considered public.

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Marcelle Phaneuf, Environmental Assessment Officer
Canadian Nuclear Safety Commission
P.O. Box 1046 Station B
280 Slater Street
Ottawa ON K1P 5S9
Telephone: 613-947-3209 or 1-800-668-5284
Fax: 613-995-5086
Email: cnsceae@ccsn.ca

Following receipt of comments on the project description, CNSC staff will consider all submissions received and make recommendations to inform the Commission's decision on the scope of the factors to be considered in the EA. In addition, CNSC staff will respond to all comments received from members of the public and Indigenous groups. The comments and responses will be placed in a table and publicly posted to the Canadian Environmental Assessment Registry. Effort will be made to group common issues together.

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If you have any questions, please do not hesitate to contact me at marcelle.phaneuf@canada.ca or by telephone at 613-947-3209.

Kind regards,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

Criteria for First Nation and Métis Local Delegation of Duty to Consult Responsibilities

The Government of Saskatchewan consults with First Nations and rights-bearing Métis communities in advance of decisions or actions which may adversely impact Treaty and Aboriginal rights and traditional uses. Consultations are targeted to the elected leadership of those communities. For the purpose of these criteria, Government recognizes the Chief and Council of a First Nation and the President of a Métis Nation – Saskatchewan Local.

The Government of Saskatchewan First Nation and Métis Consultation Policy Framework states that regional or provincial First Nations and Métis entities may be consulted only if the elected leadership of the First Nation or Métis Local has delegated this authority through its constitutional decision-making process. This document outlines what delegation mean, the process to confirm or remove delegation and the responsibilities of the authorized delegate.

In the absence of formal delegations, government consults with the elected leadership of individual First Nations or Métis Locals.

What does delegation mean?

- When a community delegates responsibility for duty to consult purposes government will notify and consult with their authorized delegate. This means that all duty to consult notifications from government will be sent directly to the delegate, not the individual community.
- Delegates are responsible for determining how to communicate with the community(s) that have delegated to them.
- Delegates are authorized to speak to government on behalf of the community(s) that have delegated to them regarding potential adverse impacts to Treaty and Aboriginal rights and traditional uses.

How does a community delegate?

Government requires documentation to confirm delegation.

- First Nations must provide;
 - a signed and dated Band Council Resolution delegating the authority for duty to consult from the First Nation to the Regional or Provincial First Nation entity, (authorized delegate).
- Métis Local Presidents must provide;
 - a signed and dated *Motion for Métis Local Delegation of Duty to Consult Responsibilities* (attached) delegating the authority for duty to consult from the Métis Local to the Regional or Provincial Métis entity (authorized delegate).

- In addition, the authorized delegate must provide;
 - a signed and dated resolution or *Motion for Authorized Delegate to Accept Delegation Responsibilities of Duty to Consult* (attached) accepting the delegation to represent the First Nation(s) or Métis Local(s) for duty to consult purposes.

Copies of all documents relating to delegation or rescinding delegation must be submitted to:

Government of Saskatchewan
Director of Aboriginal Consultation Unit
Lands and Consultation Branch
Ministry of Government Relations
610 - 1855 Victoria Avenue, REGINA SK S4P 3T2
E-mail: aboriginal.consultation@gov.sk.ca

Can delegation be removed?

- Delegation will continue until:
 - formally rescinded through a Band Council Resolution from the First Nation Chief(s) or a motion from the Métis Local President(s) that delegated; and
 - Lands and Consultation Branch, of the Ministry of Government Relations confirms receipt of these documents.

What are the responsibilities of the Authorized Delegate?

- Receive and review notification letters from government on the potential impacts to the First Nation or Métis community's ability to exercise Treaty and Aboriginal rights, such as the right to hunt, trap and fish for food and to carry out traditional uses arising from proposed projects and strategic initiatives which trigger a duty to consult;
- Work with their community (s) to determine how they will gather information and communicate the information to government;
- Speak on behalf of the community(s) in government's duty to consult processes.

Who is responsible for keeping delegation records?

- First Nations, Métis Locals and Authorized Delegates should retain a copy of the delegation record.
- The Lands and Consultation Branch, of the Ministry of Government Relations will keep maintain a record of the First Nation and Métis delegations, and will make it available to all government officials.

It is recommended that First Nations and Métis Leadership provide regular updates to their members on the status of any delegation.

Motion for Métis Local Delegation of Duty to Consult Responsibilities

The undersigned Métis Local(s), represented by their Local President(s), support the delegation of authority for duty to consult purposes from the Métis Local to Metis Nation Saskatchewan the Regional or Provincial Métis entity (authorized delegate). Delegation will continue until the Métis Local advises the Ministry of Government Relations' Lands and Consultation Branch in writing that the delegation has been rescinded.

Joe Daigneault
President signature Joe Daigneault
Print name

#37 Aug 24/19
Local Date

[Signature]
President signature

Mike Womogen
Print name

#9 Aug 24/19
Local Date

K. Vice [Signature]
President signature

Robert Macb. ent
Print name

#21 Aug 24/19
Local Date

[Signature]
President signature

Ronan Kenny
Print name

#22 Aug 24/19
Local Date

Eugenie Lafleur
President signature

Eugenie Lafleur
Print name

#67 Sept 16-19
Local Date

President signature

Print name

Local

Date

President signature

Print name

Local

Date

This template is consistent with the Criteria for First Nation and Métis Local Delegation of Duty to Consult Responsibilities.

Motion for Authorized Delegate to Accept Delegation Responsibilities of Duty to Consult

Metis Nation Saskatchewan, on behalf of the Regional or Provincial Métis entity (authorized delegate) accepts the responsibility to represent the above Métis Local(s) for duty to consult purposes.

Metis Nation - Saskatchewan

Print name

Authorized Delegate

Glen McCallum

Signature

Authorized Delegate

By: President Glen McCallum

Saskatchewan

Regional or

Provincial Métis

Entity

Sept 25 2019

Date

This template is consistent with the Criteria for First Nation and Métis Local Delegation of Duty to Consult Responsibilities.

From: Phaneuf, Marcelle (CNSC/CCSN)
'cheyenna.campbell@desnedhe.com'; 'csayazie@hotmail.com';
'tlbbeavereye@hotmail.com'; 'louiemercredi.fdl@sasktel.net';
'clhmercredi@sasktel.net'; 'victorf@sasktel.net'; 'fdlreception@sasktel.net';
'b-tsannie@hotmail.com'; 'moniquethomas2016@gmail.com';
'pdenechezhe@gmail.com'; 'nvp.glen@sasktel.net';
'leonardmontgrand@yahoo.ca'; 'mcalette@mns.work';
Bcc: 'b.merasty@mns.work'; 'geraldmorin@hotmail.com';
'earl.cook@nortep.ca'; 'nvp.mike@sasktel.net';
'vince.pinehousedc@sasktel.net'; 'chief1@birchnarrows.ca';
'bandmanager@birchnarrows.ca'; 'elmercampbell35@gmail.com';
'receptionist@mltc.net'; 'jtsanniejr@pagc.net'; 'creemancan@gmail.com';
'garrett.schmidt@yathinene.com'; 'Linda.mcnabb@yathinene.com';
'michael.dawe@yathinene.com'; Wylie, Doug (CNSC/CCSN); Zenobi, Adam (CNSC/CCSN);
Subject: Wheeler River Project - Commission Decision on the scope of the EA
Sent: 2019-12-24 8:53:00 AM

Good day,

On December 20th, 2019, the Commission issued a decision on the scope of an environmental assessment for the proposed Wheeler River project. For your convenience, I have attached the Record of Decision to this email. You may also find it on the Registry [here](#).

In the next few weeks, the CNSC will send you a formal letter regarding this decision. The letter will also outline the next steps in the EA process as well as provide information related to participant funding (PFP) for this project.

As always, I am available for any questions or comments related to the Wheeler River project by phone or email.

Best regards and best wishes for the holiday season.

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

Cassels

January 15, 2020

Ms. Lisa Thiele
Senior General Counsel
Canadian Nuclear Safety Commission
280 Slater Street, P.O. Box 1046, Station B
Ottawa, ON K1P 5S9

ahoekstra@cassels.com
tel: +1 604 283 1481
fax: +1 604 691 6120

Dear Ms. Thiele:

Re: CMD: 19-H111 Denison Mines Corp., Wheeler River Project

I am counsel to the Métis Nation – Saskatchewan (“**MNS**”), and I write today in respect of Canadian Nuclear Safety Commission (“**CNSC**”) decision number CMD: 19-H111, dated December 20, 2019 regarding the Wheeler River Project, of which Denison Mines Corp. is the proponent (the “**Decision**”). The matter concerns the scoping of a regulatory assessment for a proposed uranium mine and associated infrastructure on asserted Métis lands which are currently being negotiated by MNS and Canada on a government-to-government, nation-to-nation, basis.

MNS has significant concerns in respect of that Decision, and the way in which it was arrived at by CNSC. We were first informed of the Decision on December 24, 2019.

MNS is alarmed by the fact that the Decision was reached without its meaningful engagement, given MNS’s unique relationship with Canada and MNS’s mandate to represent Métis Citizens and advance Métis rights in Saskatchewan.

MNS is also alarmed that the Decision failed to identify MNS, on its own behalf and on behalf of several potentially impacted Métis communities, in the scoping of “identified Indigenous groups and organizations with potential interest in the project.” The exclusion of MNS is particularly unsettling given the commitments Canada has made to work with MNS to address and protect Métis rights, including in relation to the Northwest Land Claim in which the Wheeler River Project is located.

In reaching its Decision, it appears that CNSC may have provided limited consultation to local, part-time volunteer Métis groups (“**Locals**”) comprising the local councils of some, but far from all, of the potentially affected Métis communities. It also appears that CNSC concluded its limited consultation efforts with those few Locals on the basis of their non-response, despite their lack of capacity, resources or expertise for timely and meaningful engagement with the Crown. By not meaningfully engaging with MNS, the Decision failed to reflect the knowledge

and concerns of the MNS and the concerns of MNS Locals.

While MNS takes issue with several aspects of the Decision, for present purposes the most pressing are the following:

- a) The MNS is not identified as an Indigenous group or organizations with potential interests in the project;
- b) The listing of Indigenous groups with potential interests in the project does not include relevant Métis "Northern Region III" Locals, despite the fact that some were identified as potentially impacted within the project description;
- c) The listing of Indigenous groups or organizations with potential interests in the project does not identify any potentially impacted Métis "Northern Region I" Locals, and instead inappropriately refers to Métis "Northern Region I", which is a regional body constitutionally structured for the provision of delegated programs and services and not an appropriate entity for consultation;
- d) The listing of Indigenous groups or organizations with potential interests in the project does not identify any similarly affected Métis "Northern Region II" Locals;
- e) The CNSC does not appear to have given any consideration to the existing agreements between Canada and MNS in which Canada commits to renew its government-to-government, nation-to-nation relationship with MNS and which seek to address Métis rights, including in relation to the Northwest Land Claim.
- f) The CNSC failed to allow for meaningful consultation regarding Denison's project description at levels of engagement appropriate for both Locals and the MNS proper.

Briefly stated, it is not consistent with the honour of the Crown for the CNSC to suggest that it consulted with potentially impacted Métis peoples, when its limited approach to consultation failed to consider reasonable capacity constraints of Locals and excluded the MNS, a body that:

- a) represents the Métis in Saskatchewan;
- b) has developed a nation-to-nation relationship with Canada;
- c) is currently in negotiations with Canada over the very lands covered by the project; and
- d) has the necessary capacity, expertise, and authority to engage in effective consultation.

The CNSC's efforts at consultation, and conclusions regarding the potentially impacted Indigenous groups and organizations, in this case were wholly inadequate, and the Decision must be reopened to include MNS and all affected Locals within the scope of participants in the environmental assessment of the Project.

Given the limited timeframe for appealing the Decision under the *Federal Courts Act*, which was further attenuated by the unfortunate decision to release such a controversial Decision during the holiday season, we regrettably have no alternative but to preserve our client's rights by issuing an application for judicial review on or before Friday, January 17, 2020. An issued copy of our application will be served in due course.

I am optimistic that the CNSC will acknowledge this oversight and reopen Decision CMD:19-H111 to properly permit the participation of MNS and all affected Métis Locals on a forward-looking basis, such that there will be no need to pursue the application in court.

Thank you for your kind attention to this matter. I look forward to hearing from you.

Yours truly,



Arend J.A. Hoekstra
AJAH/jm

Encl.

cc: President Glen McCallum, Métis Nation – Saskatchewan
Richard Quintal, CEO, Métis Nation – Saskatchewan
The Honourable Seamus O'Regan, Minister of Natural Resources
Rumina Velshi, President, Canadian Nuclear Safety Commission
Marcelle Phaneuf, Environmental Assessment Officer, Technical Support Branch, Canadian Nuclear Safety Commission
Thomas Isaac, Counsel to Métis Nation – Saskatchewan

LEGAL*49549824.2



Unclassified

e-Doc: 6098235

Arend J.A. Hoekstra
Cassels Brock & Blackwell LLP
Suite 2200, HSBC Building, 885 West Georgia Street
Vancouver, BC V6C 3E8

Dear Mr. Hoekstra,

Your letter dated January 15, 2020 addressed to the CNSC's Senior General Counsel respecting the Commission decision on Denison Mines Corp – Wheeler River Project has been brought to the Commission's attention. In the letter, it is indicated that your client the Métis Nation – Saskatchewan (MNS) takes issue with the decision, particularly noting that the MNS is not identified in it as an Indigenous group or organization with potential interests in the project.

The Commission agrees that the MNS should be explicitly identified as having potential interests in the Wheeler River Project. The Commission is of the view that, on a going-forward basis, the potential interests that the MNS has, on its own behalf and also on behalf of its potentially impacted Métis communities in Northern Regions I, II and III, must be considered and taken into account in the environmental assessment.

To ensure that the CNSC's Indigenous consultation and engagement activities include the MNS' potential interests in the project, the Commission will direct its staff to explicitly include the MNS as an entity with potential interest in this project in its consultation efforts. This does not require a reconsideration of the Commission's scoping decision, and will be part of the ongoing consultation and engagement that staff will carry out on behalf of the Commission through the conduct of the environmental assessment.

A copy of this letter will be posted to the Canadian Impact Assessment Registry in relation to this project.

Thank you for bringing the concerns of the MNS to the attention of the CNSC.

Yours sincerely,

Rumina Velshi

c.c.: Glen McCallum, President, Métis Nation – Saskatchewan
 Richard Quintal, CEO, Métis Nation – Saskatchewan
 Thomas Isaac, Counsel to Métis Nation - Saskatchewan
 The Honourable Seamus O'Regan, Minister of Natural Resources
 Lisa Thiele, Senior General Counsel, Canadian Nuclear Safety Commission
 Marcelle Phaneuf, Environmental Assessment Officer, Technical Support Branch, CNSC

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#) on behalf of [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: [Mark Calette; Levine, Adam \(CNSC/CCSN\);](#)
[Frigault, Nicole \(CNSC/CCSN\); Zenobi, Adam \(CNSC/CCSN\); Snider2, Richard \(CNSC/CCSN\);](#)
Cc: [Cianci, Candida \(CNSC/CCSN\); tex.mns@sasktel.net;](#)
[leonardmontgrand@yahoo.ca; Earl Cook;](#)
Subject: RE: CEAA 2012 or IA
Sent: 2020-02-17 9:26:00 AM

Dear Mark,

Just to confirm, as per the Impact Assessment Act, paragraph 182, nuclear projects already started under CEAA 2012 when the new Impact Assessment Act came into force shall continue under CEAA 2012.

182. Any environmental assessment of a designated project by the Canadian Nuclear Safety Commission or the National Energy Board commenced under the 2012 Act, in respect of which a decision statement has not been issued under section 54 of the 2012 Act before the day on which this Act comes into force, is continued under the 2012 Act as if that Act had not been repealed.

As to finding a time for a chat with you, Adam Z. and I, would you be available at 11:30 (Saskatoon time) on Tuesday February 18th? If not, possibly 3:00 on the same day?

I look forward to talking with you. Have a nice day,
Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209

From: Mark Calette <mcalette@mns.work>
Sent: Saturday, February 15, 2020 3:36 PM
To: Levine, Adam (CNSC/CCSN) <adam.levine@canada.ca>
Cc: Frigault, Nicole (CNSC/CCSN) <nicole.frigault@canada.ca>; Zenobi, Adam (CNSC/CCSN) <adam.zenobi@canada.ca>; Snider2, Richard (CNSC/CCSN) <richard.snider2@canada.ca>; Cianci, Candida (CNSC/CCSN) <candida.cianci@canada.ca>; Phaneuf, Marcelle (CNSC/CCSN)

<marcelle.phaneuf@canada.ca>; tex.mns@sasktel.net; leonardmontgrand@yahoo.ca; Earl Cook
<earlcook@mns.work>

Subject: Re: CEAA 2012 or IA

Hi Adam. Thanks for the reply. It was Jordan Kinnear who made that statement from the IAA.

No one is available on Monday as that is a stat holiday here in Sask.

I think we can work something out for Tuesday.

Thanks

Mark

Sent from iPhone

On Feb 15, 2020, at 2:30 PM, Levine, Adam (CNSC/CCSN)
<adam.levine@canada.ca> wrote:

Hi Mark, thanks for reaching out! I checked with our EA specialists and we are not aware of a provision like that for projects that have already been started under CEAA 2012. Could you let us know who from the Impact Assessment Agency you spoke to about that? We can maybe get some clarity from them on that.

Also, I know Adam Z. and Marcelle were working with you to find a time to chat in the next few days. Could you confirm if you are available on Monday or Tuesday this week? We can include this topic as part of our discussion as well.

Adam

Sent from my Bell Samsung device over Canada's largest network.

----- Original message -----

From: Mark Calette <mcalette@mns.work>

Date: 2020-02-15 12:20 PM (GMT-05:00)

To: "Frigault, Nicole (CNSC/CCSN)" <nicole.frigault@canada.ca>, "Levine, Adam (CNSC/CCSN)" <adam.levine@canada.ca>, "Zenobi, Adam

(CNSC/CCSN)" <adam.zenobi@canada.ca>, "Snider2, Richard
(CNSC/CCSN)" <richard.snider2@canada.ca>
Cc: tex.mns@sasktel.net, leonardmontgrand@yahoo.ca, Earl Cook
<earlcook@mns.work>
Subject: CEAA 2012 or IA

Hello CNSC.

I am attending an Impact Assessment Agency workshop today along with many of our elected leaders.

We were told by the IA representative that projects that are being grandfathered into CEAA 2012 can opt-in to the new Impact Assessment process. Who makes the decision on whether to stay with CEAA 2012 or to opt-in to the new Impact Assessment process?

Both myself and our leaders would like to know an answer to that question.

Sincerely,

Mark Calette
Senior Director Administration
Métis Nation-Saskatchewan

Get [Outlook for iOS](#)

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#) on behalf of [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
To: ['nvp.glen@sasktel.net'](mailto:nvp.glen@sasktel.net)
Cc: leonardmontgrand@yahoo.ca; ['Mark Calette'](#); b.merasty@mns.work;
['geraldmorin@hotmail.com'](mailto:geraldmorin@hotmail.com); ['earl.cook@nortep.ca'](mailto:earl.cook@nortep.ca);
Subject: Letter re Notice of Commission Decision on Scoping of EA for Wheeler River Project and Next Steps
Sent: 2020-03-20 2:35:12 PM

Dear President McCallum,

The purpose of the attached letter is to notify you that on December 20, 2019, the Canadian Nuclear Safety Commission (CNSC) made a decision on the scope of factors to be considered in the environmental assessment of the Wheeler River Project (the Project) proposed by Denison Mines Corp (Denison).

The letter also informs you of the next steps in the EA process, including the fact that Denison Mines Corp has suspended activities on the environmental assessment.

I remain available for any questions or comments by phone or email,

Best regards

Marcelle

Marcelle Phaneuf, M.Sc

Environmental Assessment Officer, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 613-947-3209

Agente en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 613-947-3209



March 20, 2020

e-Doc: 6255878

President Glen McCallum
Métis Nation of Saskatchewan
Suite 201, 208-19th Street W
Saskatoon, SK S7M 5X8
nvp.glen@sasktel.net

Subject: Notice of Commission Decision on the Scope of the EA for Denison Mines' Proposed Wheeler River Project

Dear President McCallum:

The purpose of this letter is to notify you that on December 20, 2019, the Commission made a decision on the scope of factors to be considered in the environmental assessment (EA) of the Wheeler River Project (the Project) proposed by Denison Mines Corp (Denison).

The Commission, pursuant to section 19 of the *Canadian Environmental Assessment Act*, 2012 (CEAA 2012), determined the scope of factors to be considered in the EA for the Project to include the factors mandated by paragraphs 19(1) (a) to (h) of the CEAA 2012 with no additional factors. The Commission understands that, pursuant to subsection 19(3) of CEAA 2012, the EA for the Project will consider Indigenous traditional knowledge and community knowledge. See the enclosed copy of the Record of Decision for more details (Appendix A).

Indigenous Consultation

The CNSC, as an agent of the Government of Canada and as Canada's nuclear regulator, recognizes and understands and values the importance of consulting and building relationships with Indigenous peoples in Canada.

As an Indigenous group with interest in this Project, the CNSC is interested in hearing any views Métis Nation of Saskatchewan (MN-S) may have with respect to the Project. The CNSC encourages you, throughout the EA process and including but not limited to the review and comment periods, to:

- advise the CNSC of any adverse impacts the Project may have on your group's potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns;
- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures; and

- advise the CNSC of how you and your group would like to be consulted by the Crown as part of the regulatory review process for this Project.

MN-S's participation in the EA process is intended to be supported through the CNSC's Participant Funding Program (PFP). Please note that should additional funding be needed by MN-S, beyond the funding that will be awarded through the PFP, requests or applications for additional funding will be considered by the CNSC on a case-by-case basis.

Current Status and Next Steps

Now that the scoping decision had been rendered by the Commission, the next step in the process will be the submission by Denison of a draft Environmental Impact Statement (EIS). ON March 20th, 2020, Denison placed a [hold](#) on EA activities related to the Project. Therefore, the CNSC does not anticipate the draft EIS to be submitted in 2020.

As part of the EA process, MN-S will have the opportunity to provide comments on Denison's draft EIS once it is submitted. In later steps of the process, MN-S will also have the opportunity to comment on CNSC staff's Environmental Assessment (EA) Report and Commission Member Document, and to submit comments to the Commission for an eventual EA hearing as a written intervention and/or oral presentation. In addition, CNSC staff will continue to reach out with offers to meet and conduct additional consultation and engagement activities throughout the EA process.

The first phase of PFP, for the review of the draft EIS, will be available some months prior to the draft EIS being submitted. The CNSC will be offering \$150,000, to be disbursed among all eligible applicants, to help in the review of the draft EIS. A second phase of PFP will be announced at a later date, to help in the review of the EA report and CMD, and to prepare an intervention for an EA hearing.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process for the Participant Funding Program: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm> If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cnscc.pfp.ccsn@canada.ca.

If you have any questions relating to this Project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact me by phone at 613 947-3209 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,

Marcelle Phaneuf
Environmental Assessment Officer, Environmental Assessment Division
Canadian Nuclear Safety Commission

Enclosure: Appendix A: Record of Decision DEC 19-H111 in the Matter of Denison Mines Corporation – Decision on the Scope of an Environmental Assessment of the Proposed Wheeler River Project

c.c.: M. Calette, B. Merasty, G. Morin, MN-S
P. Fundarek, C. Cianci, C. Cattrysse, M. Landon, S. Akhter, A. Levine, A. Zenobi,
CNSC
A. Sadik, B. England, SEASB

From: [Phaneuf, Marcelle \(CNSC/CCSN\)](#)
['nvp.glen@sasktel.net'](#); ['Mark Calette'](#); ['b.merasty@mns.work'](#);
To: ['geraldmorin@hotmail.com'](#); ['slandriecrossland@mns.work'](#);
['s.nickolet@mns.work'](#);
Cc: Fundarek, Peter (CNSC/CCSN); [Nana-Owusua Kwamena \(CNSC/CCSN\)](#) ([nana-owusua.kwamena@canada.ca](#)); Cattrysse, Clare (CNSC/CCSN); [Akhter, Salman \(CNSC/CCSN\)](#); [Froess, Ryan \(CNSC/CCSN\)](#); [Zenobi, Adam \(CNSC/CCSN\)](#); ['Sadik, Aimann ENV'](#); [England, Brianne ENV](#);
Subject: Update Letter re Wheeler River Project and Next Steps
Sent: 2021-02-15 12:54:00 PM

Dear President McCallum,

The purpose of the attached letter is to provide you an update on the status of the proposed Wheeler project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including the potential for consultation with the CNSC.

I remain available for any questions or comments by phone or email,

Best regards
Marcelle Phaneuf

Marcelle Phaneuf, M.Sc

Environmental Assessment Specialist, Technical Support Branch
Canadian Nuclear Safety Commission / Government of Canada
marcelle.phaneuf@canada.ca / Tel: 343-551-4196 ** NEW**

Spécialiste en évaluation environnementale, Direction générale du soutien technique
Commission canadienne de sûreté nucléaire / Gouvernement du Canada
marcelle.phaneuf@canada.ca / Tél : 343-551-4196 ** NOUVEAU**



February 15th, 2021

e-Doc: 6482761

President Glen McCallum
Métis Nation of Saskatchewan
Suite 201, 208-19th Street W
Saskatoon, SK S7M 5X8
nvp.glen@sasktel.net

Subject: Notice of restart of activities on the Federal Environmental Assessment (EA) for Denison Mines' Proposed Wheeler River Project

Dear President McCallum:

The purpose of this letter is to notify you that Denison Mines Corp (Denison) has notified the CNSC that they have resumed Environmental Assessment (EA) activities related to the Wheeler River Project (the Project) on January 01, 2021, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The CNSC has also received a revised project description from Denison Mines Corp. for the Wheeler River Project (<https://www.ceaa-acee.gc.ca/050/evaluations/proj/80178>). The revisions do not constitute material changes to the project and therefore public consultation is not required.

Current Status and Next Steps

The next step in the EA process will be the submission by Denison of a draft Environmental Impact Statement (EIS). Denison has indicated that this submission can be anticipated in early 2022.

As part of the EA process, Métis Nation of Saskatchewan (MN-S) will have the opportunity to provide comments on Denison's draft EIS once it is submitted as part of the public review period. In later steps of the process, MN-S will also have the opportunity to comment on CNSC staff's Environmental Assessment (EA) Report and Commission Member Document (CMD), and to submit comments to the Commission for an eventual EA Commission hearing as a written intervention and/or oral presentation.

In addition, CNSC staff will continue to reach out with offers to meet and conduct additional consultation and engagement activities throughout the EA process with MN-S. As an Indigenous group with interest in this project, the CNSC is interested in hearing any views your Nation may have with respect to the project. The CNSC encourages MN-S, throughout the EA process and including but not limited to the review and comment periods, to:

- advise the CNSC of any adverse impacts the project may have on potential or established Indigenous and/or treaty rights; and if so
- clearly indicate the specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated as well as any evidence that will help in understanding these concerns;

- provide local and Indigenous knowledge to support determination of potential impacts and potential mitigation measures; and
- advise the CNSC of how you and MN-S would like to be consulted by the Crown as part of the regulatory review process for this project.

In addition, the CNSC will be making funding available to support MN-S's participation throughout the EA process through the CNSC's Participant Funding Program (PFP).

The first phase of PFP, for the review of the draft EIS, will be announced by May of 2021. The CNSC will be offering funding, to be disbursed among all eligible applicants, to help in the review of the draft EIS. A second phase of PFP will be announced at a later date, to help in the review of the EA report and CMD, and to prepare an intervention for an EA hearing. Please note that should additional funding be needed by MN-S, beyond the funding that will be awarded through these PFP opportunities, requests or applications for additional funding will be considered by the CNSC on a case-by-case basis.

Please visit the CNSC's PFP funding opportunities webpage for more information, including the application process for the Participant Funding Program: <http://nuclearsafety.gc.ca/eng/the-commission/participant-funding-program/opportunities/index.cfm>. If you have questions about the PFP please contact the PFP Administrator toll-free at 1-800-668-5284, or by e-mail at cncs.pfp.ccsn@canada.ca.

If you have any questions relating to this project during the EA process, or would like to discuss having a meeting with CNSC staff, please contact me by phone at 343-551-4196 or by email at marcelle.phaneuf@canada.ca.

Yours sincerely,

Marcelle Phaneuf

Marcelle Phaneuf
Environmental Assessment Officer, Environmental Assessment Division
Canadian Nuclear Safety Commission

c.c.: M. Calette, B. Merasty, G. Morin, S Landrie-Crossland, S. Nickolet MN-S
P. Fundarek, N. Kwamena, C. Catrysse, S. Akhter, R. Froess, A. Zenobi, CNSC
A. Sadik, B. England, SEASB

From: [Froess, Ryan \(CNSC/CCSN\)](#)
To: [glenmccallum@mns.work](#); [Mark Calette](#); [slandriecrossland@mns.work](#); [s.nickolet@mns.work](#); ['nvp.mike@sasktel.net'](#); [earlcook@mns.work](#); [Phaneuf, Marcelle \(CNSC/CCSN\)](#); [Adam Zenobi \(CNSC/CCSN\)](#)
Cc: [\(adam.zenobi@canada.ca\)](#); [Adam Levine \(CNSC/CCSN\)](#); [\(adam.levine@canada.ca\)](#)
Subject: Denison Wheeler River Project and Next Steps
Sent: 2021-03-26 4:12:00 PM

Good afternoon President McCallum and Mr. Calette,

I am following up on a letter that was sent by the Canadian Nuclear Safety Commission (CNSC) to Métis Nation - Saskatchewan (MN-S) on February 15th, 2021, regarding the Wheeler River Project (the Project) proposed by Denison Mines Corp, which is undergoing an EA under the Canadian Environmental Assessment Act, 2012 (CEAA, 2012). The purpose of the letter was to inform MN-S that Denison had notified the CNSC that they had resumed Environmental Assessment (EA) activities related to the Project.

I am reaching out on behalf of myself and Marcelle Phaneuf (EA specialist responsible for the proposed project at the CNSC). The CNSC would like to meet with MN-S to provide an update on the status of the proposed Project and its environmental assessment under CEAA 2012, as well as the next steps in the EA process including consultation and engagement activities with MN-S by the CNSC throughout the EA process. As an Indigenous Nation with direct interest in this project, the CNSC is interested in hearing any views you may have with respect to the project including but not limited too the following:

- any adverse impacts the project may have on potential and/or established Indigenous rights;
- how specific right(s) that may be affected, the specific impact(s) on those right(s), how those impacts can be mitigated;
- opportunities to provide Indigenous knowledge to support determination of potential impacts and potential mitigation measures;
- advise the CNSC of how the MN-S would like to be consulted by the Crown as part of the regulatory review process for this project (e.g. opportunity to work together to develop a Terms of Reference or plan for consultation for the Wheeler River Project EA and regulatory process).

In addition, as outlined in the letter the CNSC will be making funding available to support MN-S's participation throughout the EA process through the CNSC's Participant Funding Program (PFP). The first phase of PFP, for the review of the draft EIS, will be announced by late Spring of 2021.

The CNSC is committed to building meaningful and long-term relationships with MN-S. We would like to propose to set up a meeting with MN-S in the spring of 2021 to discuss next steps

in the EA and consultation process, opportunities to collaborate early on in the EA process, and understand how the project may impact MN-S's rights and interests.

We (are flexible and are looking forward to meeting virtually) on dates that work best for MN-S.

Thank you,

Ryan Froess

Senior Policy Advisor, Policy, Aboriginal, and International Relations Division

Canadian Nuclear Safety Commission

ryan.froess@canada.ca | Cell: 306-914-7892

Conseiller Principal des Politiques, Division des Politiques et des Affaires autochtones et Internationales

Commission Canadienne de Sûreté Nucléaire

ryan.froess@canada.ca | Cell: 306-914-7892

Meeting Agenda: May 11th, 2021: CNSC & MN-S

1. Introductions/Roundtable
2. MN-S EA Team and PFP
3. CNSC-MN-S Denison EA Update
4. CNSC-MN-S NexGen EA Update
5. Path Forward and Next Steps for MN-S and CNSC on EA Projects

From: [Sydney Nickolet](#)
To: [Froess, Ryan](#)
Cc: [Levine, Adam](#); [Mark Calette](#); [Shannon Landrie-Crossland](#);
Subject: RE: Indigenous review committee - more information
Sent: 2021-05-25 12:09:22 PM

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Ryan and Adam,

Thank you for supplying my team with this information and these dates. I will discuss with them and see what works for us and get back to you.

Have a great rest of your day!

Best,

Sydney Nickolet (she/her/hers)

Jr. Duty to Consult Liaison Officer
Métis Nation-Saskatchewan

Suite 201, 208-19th Street West
SASKATOON, SK
S7M 5X8

Tel: 306-381-5286

Email: s.nicolet@mns.work



From: Froess, Ryan <ryan.froess@cnsccsn.gc.ca>
Sent: Friday, May 21, 2021 1:48 PM
To: Sydney Nickolet <s.nicolet@mns.work>
Cc: Levine, Adam <Adam.Levine@cnsccsn.gc.ca>; Mark Calette <mcalette@mns.work>
Subject: RE: Indigenous review committee - more information

Hi Sydney,

Great let me know what dates work best in June for MN-S and we can work together to set something up. It might be easiest for the two of us both to exchange a few dates and times that work for each group and then settle on something in June rather than going back in forth with everyone. Generally speaking afternoons work best on our end as Adam , Nicole, and Marcelle who are all working on the two EA files are 2 hours ahead and with times changes normally booked in our mornings.

A few potential dates for CNSC Staff but we can also work to move schedules around to work with MN-S. Ideally if would be great to have something monthly set-up that work for all those involved but lets work on setting up something in June and we can go from there.

June 3 – 1 pm – 2:30 pm CST

June 7 - 1 pm – 2:30 pm CST

June 16 - 1 pm – 2:30 pm CST

Have a great weekend,
Ryan

From: Levine, Adam <Adam.Levine@cnscccsn.gc.ca>

Sent: May 20, 2021 1:25 PM

To: Sydney Nickolet <s.nickolet@mns.work>; Zenobi, Adam <adam.zenobi@cnscccsn.gc.ca>

Cc: Froess, Ryan <ryan.froess@cnscccsn.gc.ca>; Arend J. A. Hoekstra <ahhoekstra@cassels.com>; Mark Calette <mcalette@mns.work>; Shannon Landrie-Crossland <slandriecrossland@mns.work>; Phaneuf, Marcelle <marcelle.phaneuf@cnscccsn.gc.ca>; Frigault, Nicole <Nicole.Frigault@cnscccsn.gc.ca>

Subject: RE: Indigenous review committee - more information

Hi Sydney, thanks for following-up! What we were discussing at our last meeting was the possibility of having a representative of the MN-S participate in the Federal-Provincial Review Team for the review of the Environmental Impact Statements (EIS) for the NexGen and Denison mine projects (there is one of these review teams per project). We would be happy to share some documentation about the MN-S' potential role on these review teams, as well as other possibilities for us to collaborate for these projects, including a Rights Impact Assessment process we can complete together.

Ryan from our team will work to set up a meeting for us to discuss these topics in more detail in June. Let us know if that works for you and the MN-S team and if you have any preferences for meeting dates and times, thanks!

Adam

From: Sydney Nickolet <s.nickolet@mns.work>

Sent: May 20, 2021 2:04 PM

To: Zenobi, Adam <adam.zenobi@cnscccsn.gc.ca>

Cc: Levine, Adam <Adam.Levine@cnsccsn.gc.ca>; Froess, Ryan <ryan.froess@cnsccsn.gc.ca>;
Arend J. A. Hoekstra <ahoekstra@cassels.com>; Mark Calette <mcalette@mns.work>; Shannon
Landrie-Crossland <slandriecrossland@mns.work>

Subject: Indigenous review committee - more information

Good afternoon Adam,

You had mentioned in our last meeting that there was an Indigenous review committee that the MN-S may be interested in. Would you be able to provide our team with the terms of reference for that committee including what it all entails, is it project specific, etc.

Thank you,

Sydney Nickolet (she/her/hers)

Jr. Duty to Consult Liaison Officer

Métis Nation-Saskatchewan

Suite 201, 208-19th Street West

SASKATOON, SK

S7M 5X8

Tel: 306-381-5286

Email: s.nickolet@mns.work





Wheeler River Project and Rook I Project

Environmental Assessment (EA) Process Overview and Indigenous participation





Agenda

1. Introduction
 - Wheeler River Project
 - Rook I Project
2. CEAA 2012 EA Process
3. Timelines
 - EA Timelines
 - Wheeler River Project Timelines
 - Rook I Project Timelines
4. Indigenous Consultation in the EA Process
5. Questions



Wheeler River Project

- Joint venture project owned by Denison Mines Corp and JCU Canada Exploration Company Ltd.
- Proposed uranium mine and processing plant in the eastern area of the Athabasca Basin region
- *In situ* recovery mining process and precipitation processing plants
- Closed loop process reusing water from precipitation process to inject into *in situ* recovery mining



Rook I Project

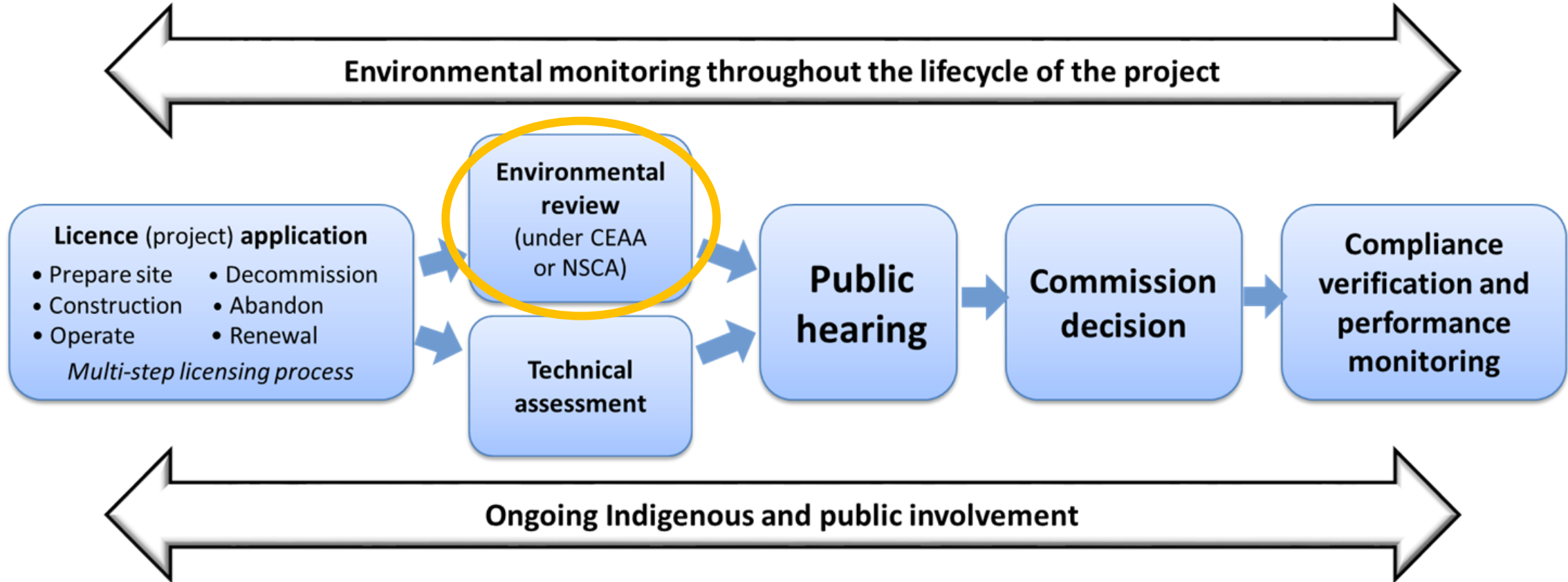
- Owned by NexGen Energy Ltd.
- Proposed uranium mine and mill development in the southwestern area of Athabasca Basin region
- Underground and surface facilities to support mining and processing of uranium ore
 - Underground mining
 - On-site milling
 - Surface facilities for storage of waste
 - Underground tailings management facility
 - Effluent treatment centre



Environmental Assessment Process

CEAA 2012 Environmental Assessments

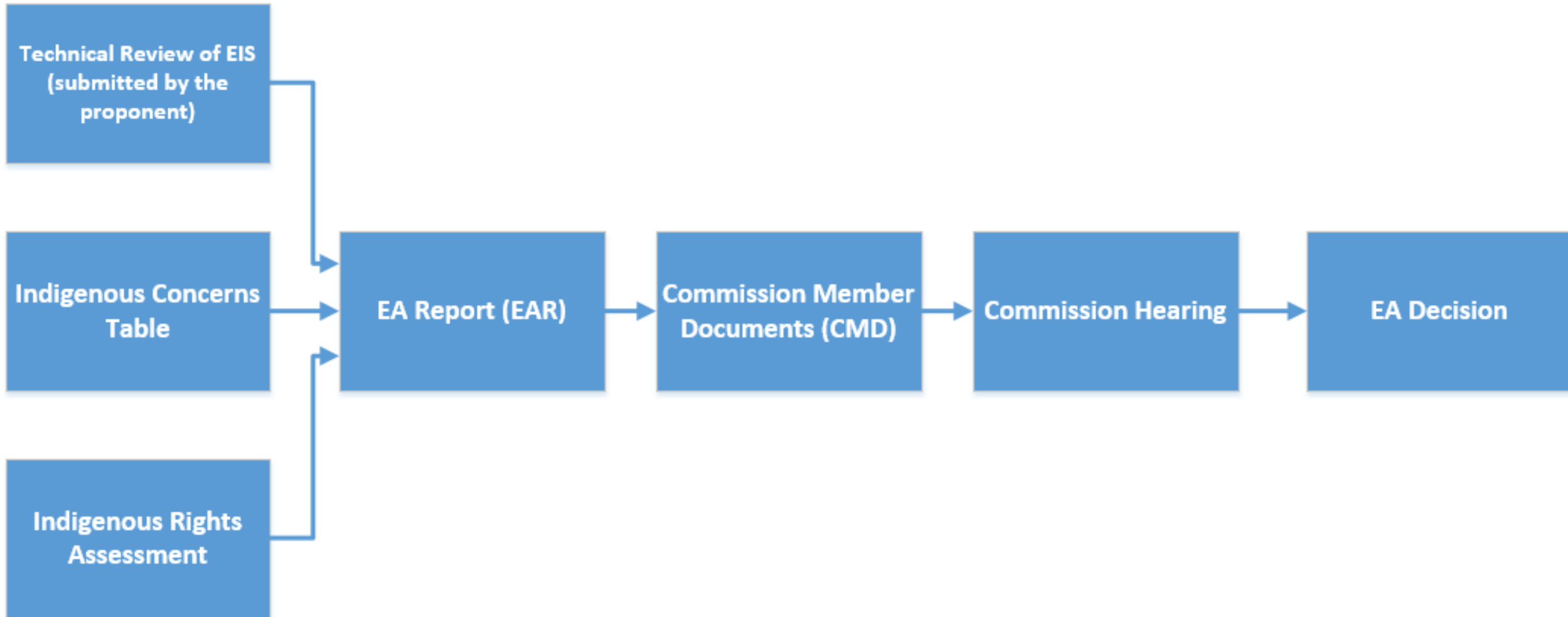
Environmental Protection Framework



Proponents must demonstrate that they have made adequate provisions for the protection and health and safety of people and the environment



Outputs of the EA process





Environmental Assessment Process Timelines

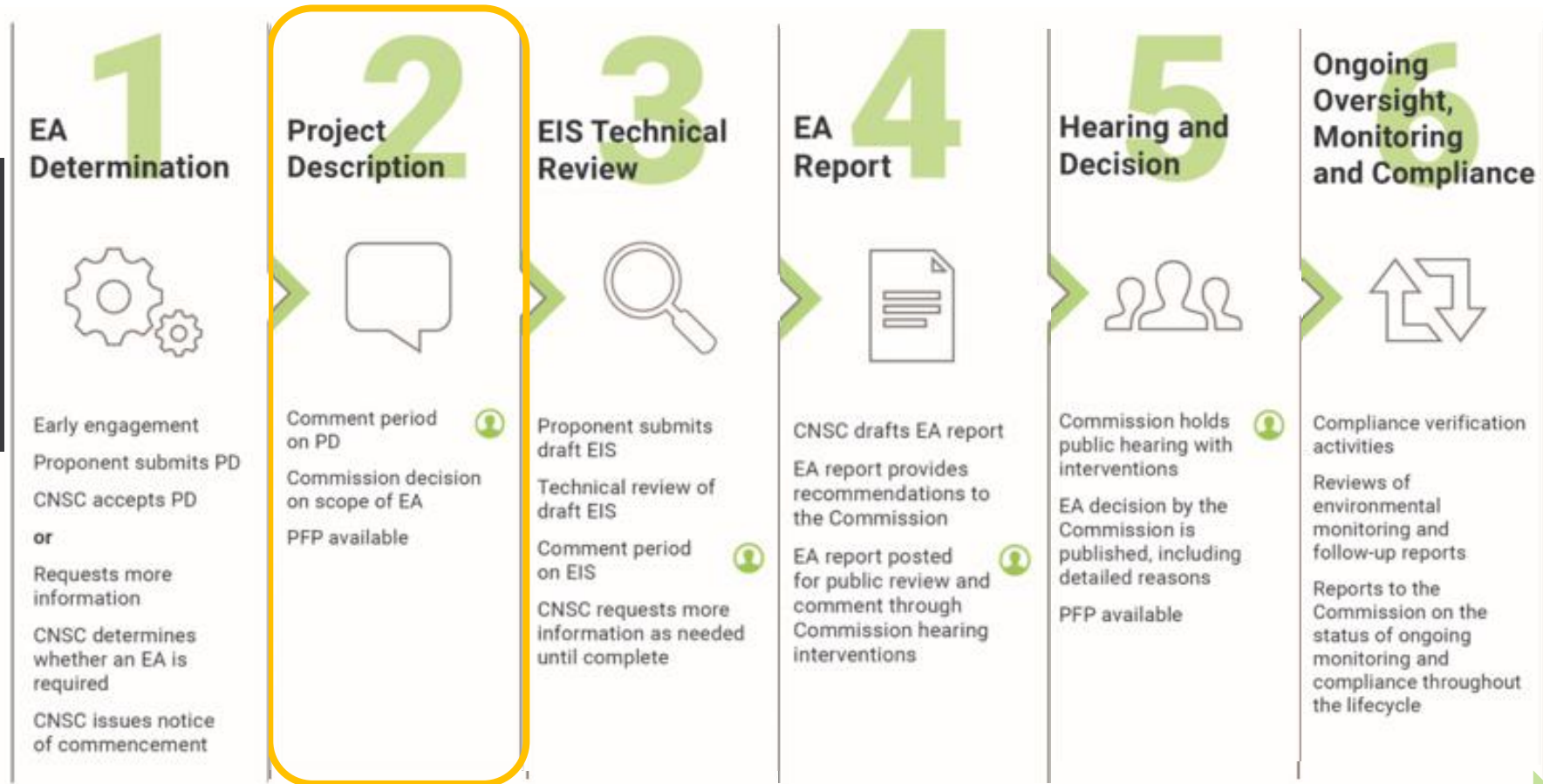


Environmental Assessment Process

Canadian Environmental Assessment Act, 2012

Legend

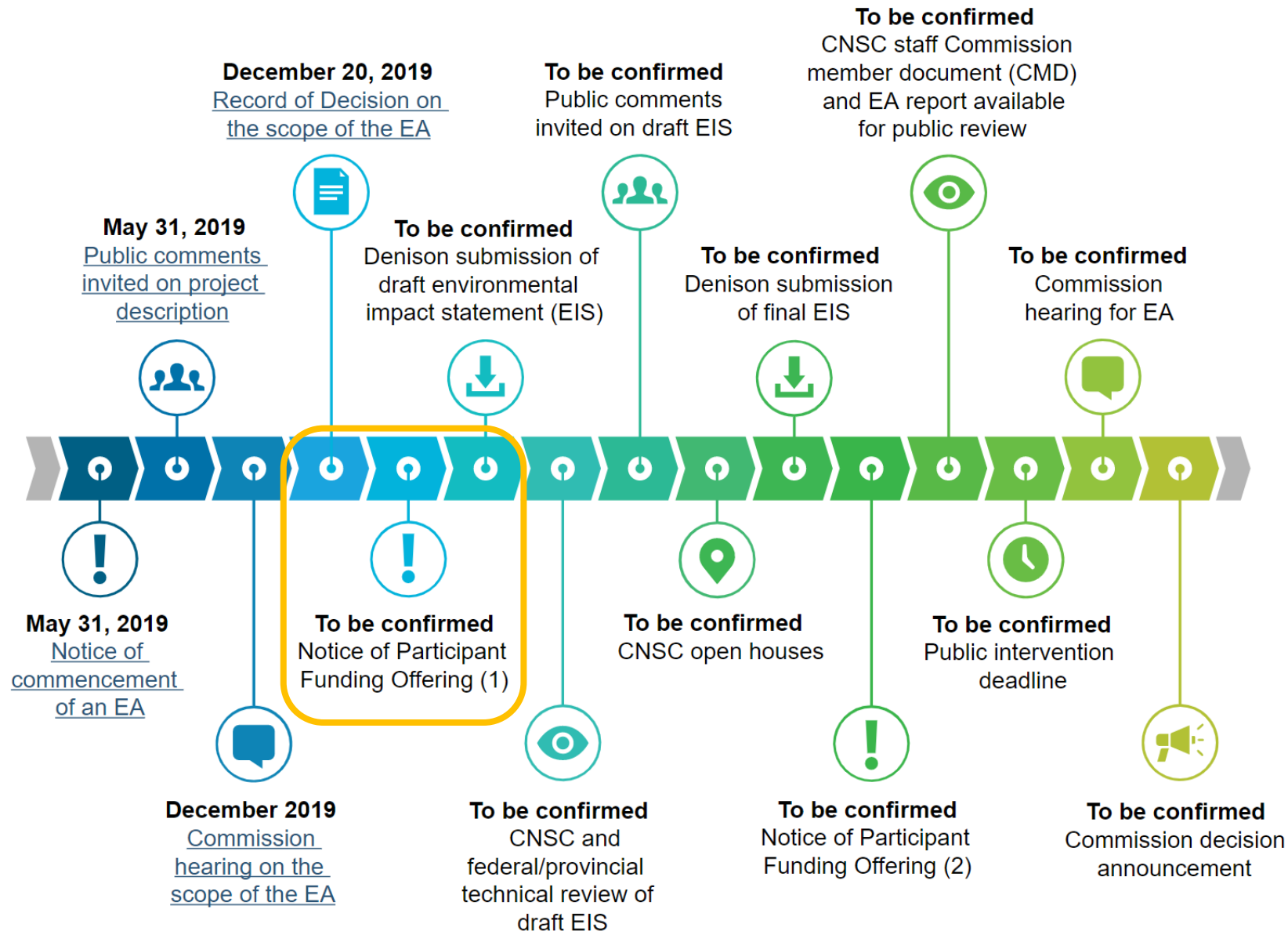
EA: Environmental Impact Assessment
PD: Project Description
EIS: Environmental Impact Statement
PFP: Participant Funding Program
👤 : Formal Participation Opportunity



Ongoing public engagement and Indigenous Consultation throughout the EA Process

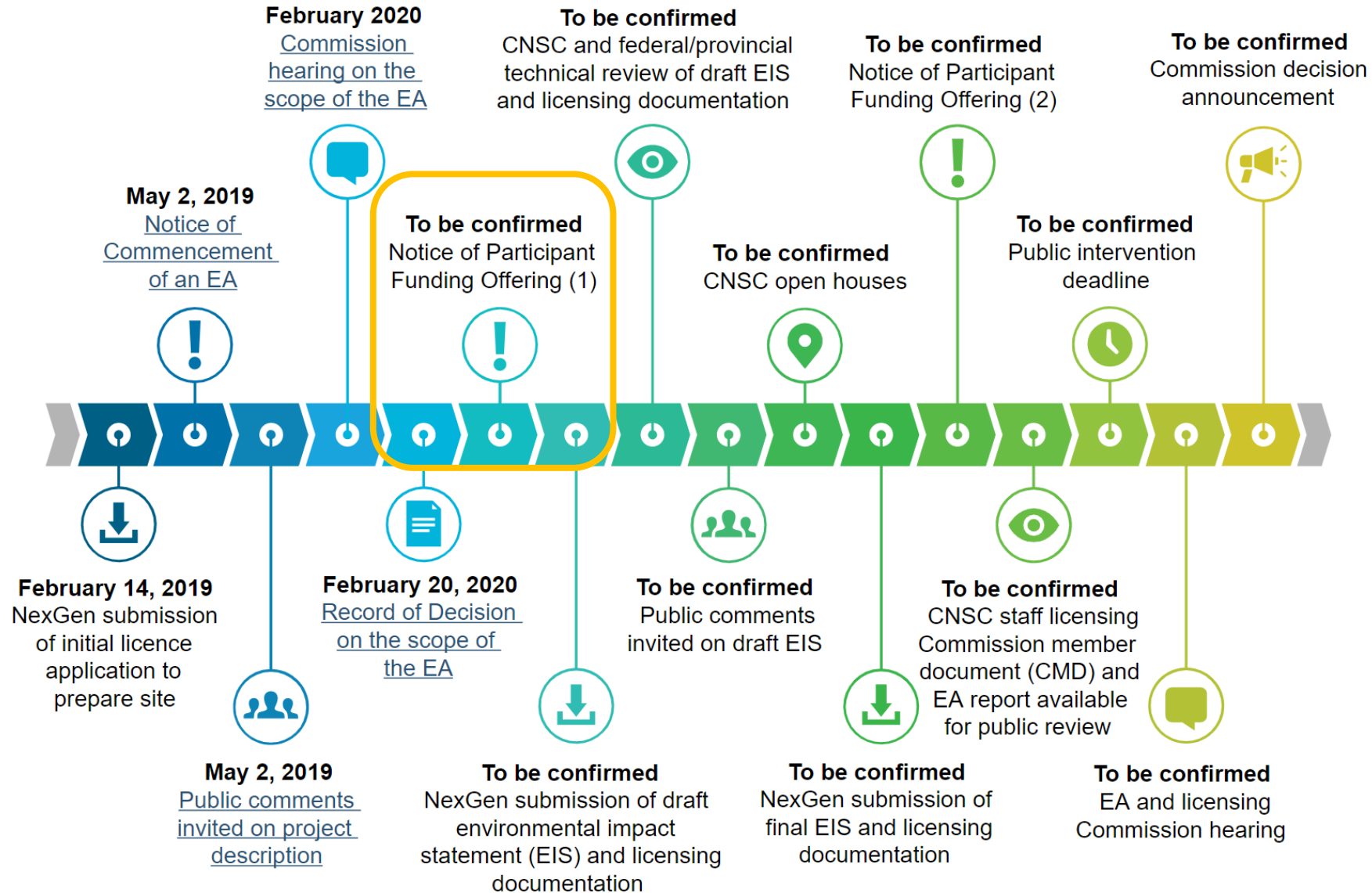


Wheeler River Project





Rook I Project





CEAA 2012 EA Process Indigenous Consultation



Indigenous Engagement and Consultation

Engagement

- CNSC requires licensees to engage with potentially affected Indigenous peoples early in the development and throughout the life of their project

Consultation

- As an agent of the Crown, CNSC consults with potentially impacted Indigenous peoples to understand and address potential impacts to Indigenous and/or treaty rights from a project
- CNSC leads a whole-of-government approach to improve the efficiency/effectiveness of engagement and consultation processes

Building long-term positive and trusted relationships with Indigenous peoples in Canada

Importance of Indigenous Participation in the EA Process

***Incorporate
traditional
knowledge***

Understand the effects and potential impacts of the project on potential or established Indigenous or Treaty Rights

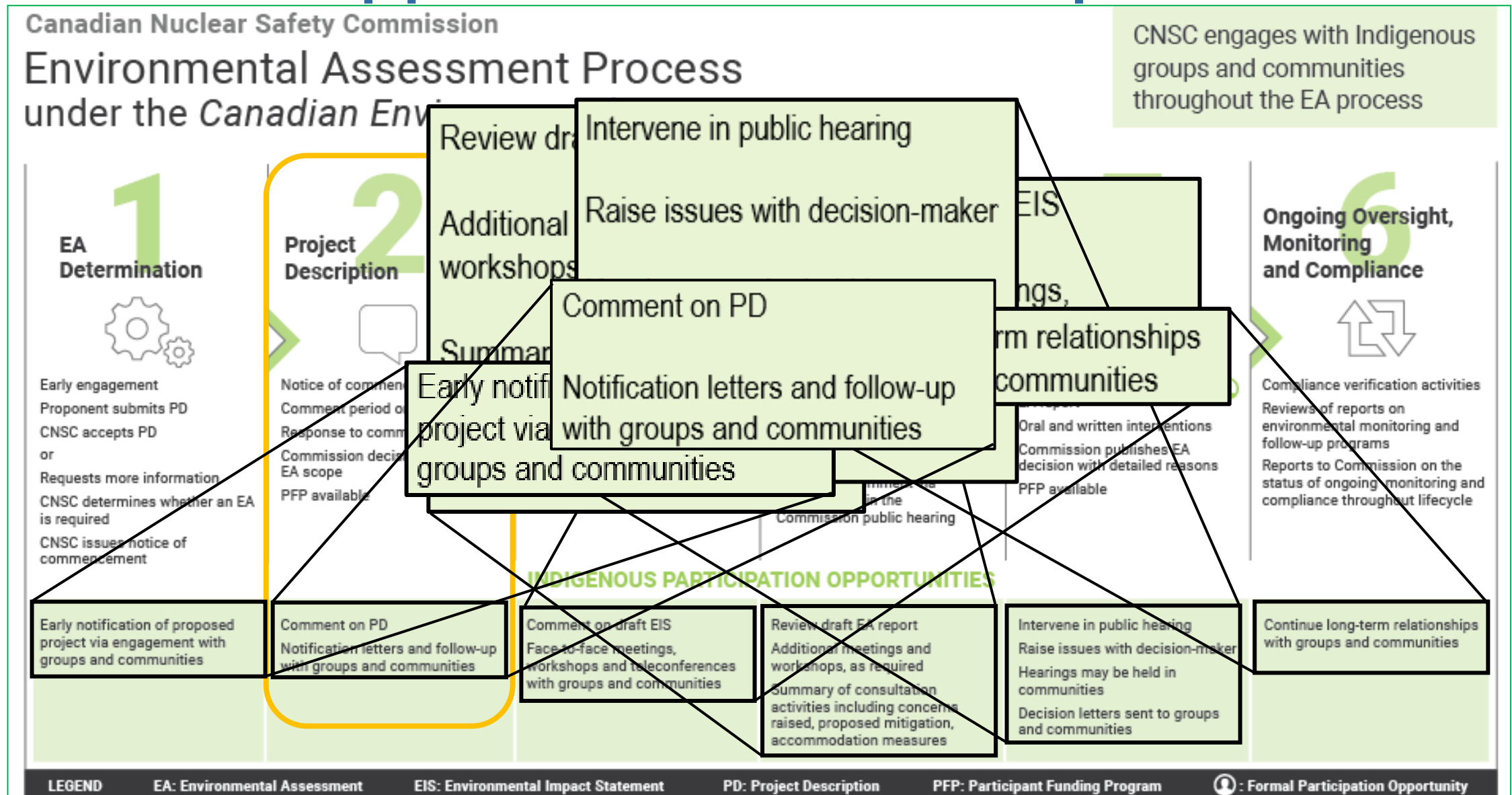
Ensure mitigation and accommodation is considered to address effects and potential impacts

Determine significance of adverse effects

The CNSC looks at potential impacts on the ability to exercise potential and established Indigenous and Treaty Rights in the future, should the project be allowed to proceed.



Opportunities to Participate



Indigenous Participation in the EA Process and EA Report

CNSC offers the following to potentially impacted indigenous groups:

- Regular correspondence and meetings to provide project updates throughout
- Completion of Traditional Knowledge and Land Use Studies
- Public comment periods (on the project description, draft EIS)
- Signing of Terms of References for consultation (if desired)
- Consultation on CEAA 2012 section 5(1)(c) effects due to the project
- Issues and Concerns Tables
- Participation on the Federal and Provincial Review Team for the draft EIS
- Review of relevant sections of the EA Report
- Review of Rights Impact Assessments for the MNS

Funding is available for the activities listed above



Canadian Nuclear
Safety Commission

Commission canadienne
de sûreté nucléaire

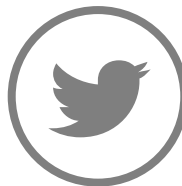
Canada

Connect With Us

Thank You! Questions?



nuclearsafety.gc.ca





TWO WORLDS
CONSULTING

Wheeler River Project and MN-S Engagement

Métis Nation of Saskatchewan
Presented to CNSC and Denison
June 25, 2021



IMPACT ASSESSMENT THROUGH THE EYES OF MÉTIS

- Effects evaluated inclusive of Métis values and interests and informing project design and mitigation
- Métis Knowledge Study is a critical part of engagement strategy and informs effects assessment
- Science and Métis Knowledge actively considered together
- Project legacy key to MN-S and Denison relationship
- Relationship with Denison part of Métis long-term interests in the area



KEY ACTIVITIES FOR MÉTIS NATION OF SASKATCHEWAN (MNS) FOR EIS INVOLVEMENT, BY YEAR

PROPOSED 2021/2022 ACTIVITIES (12 MONTHS)

Clarification around timelines and approaches

Engagement agreement / arrangements with Denison

Métis input into Valued Components (VCs) and issues identification

- Denison presentation on project
- Meetings (virtual and in-person) in NR#1, NR#2 and NR#3
- Characterization of Métis VCs

Métis Knowledge Study Agreement

Métis Knowledge Study based on identified VCs (NR#1 and NR#3)

Métis Knowledge Study outcomes woven into EIS in support of science studies

- Baseline, effects assessment, mitigation, follow-up and monitoring

Regular community presentations with input from Denison in NR#1, NR#2 and NR#3

Presentation of Métis Knowledge Study to NR#1, NR#2 and NR#3 Citizens

SUPPORTING ACTIVITIES

- Monthly meetings with Denison to resolve interests and share status
- Review of Denison documents and background on project
- Use of Pinehouse Indigenous Knowledge Report
- MNS reviews of previous minutes and issues tracking and how issues were proposed to be resolved
- Funding for a community coordinator (full-time) plus a Duty to Consult Officer (3/4 time)



BUDGET FOR MÉTIS NATION OF SASKATCHEWAN (MNS) FOR EIS INVOLVEMENT, BY YEAR

2021/2022 BUDGET (12 MONTHS) ACROSS NR#1, 2 & 3

Northern Region 1, 2, & 3 Leadership oversight = \$90,000

Duty to Consult officer salary (\$/yr) @ 75% time = \$86,250

Community Coordinator (\$/yr): salary = \$75,000

Travel and related activity expenses = \$195,000

MNS Citizen meetings related to Valued Component and Issue Scoping = \$73,377

Métis Knowledge Study = \$300,000

Métis Knowledge weaving (effects assessment, mitigation, follow-up and monitoring) = \$76,750

Regular meetings = \$7730

TOTAL = \$904,107 + 15% Admin fee (on fees)

Not included:

- Legal fees, costs incurred to date, support for science research, technical reviews

From: [Sydney Nickolet](#)
To: [David Cates](#)
Cc: [Mark Calette](#); [Shannon Landrie-Crossland](#); [Hoekstra, Arend J.A.](#); [Froess, Ryan](#);
Subject: Follow-up to June 25 Denison MN-S Meeting
Attachments: [Response to June 25 2021 Meeting.pdf.DRF](#)
Sent: 2021-07-05 5:59:51 PM

Dear David Cates,

Please find enclosed a letter from Mark Calette, Senior Director Lands and Consultation, Métis Nation-Saskatchewan.

Sincerely,

Sydney Nickolet (she/her/hers)

Jr. Duty to Consult Liaison Officer

Métis Nation-Saskatchewan

Suite 201, 208-19th Street West

SASKATOON, SK

S7M 5X8

Tel: 306-381-5286

Email: s.nickolet@mns.work





July 5th, 2021

Dear Mr. Cates,

Re: Follow-up from Meeting of June 25, 2021 (the “Meeting”)

I am writing as a follow-up to our recent Meeting. As I said, and as hopefully evidenced by the energy we have invested in preparing a workplan and budget, we are prepared to work with Denison as it seeks to advance the Wheeler River project. Wheeler River is a significant project which has the potential to impact the Métis lives and communities across Northern Region 1, 2, and 3, and therefore represents a priority for my office.¹

As touched on below, I was disappointed that key members of the Denison team seemed unable to acknowledge that Denison’s previous actions had broken trust. My team faces tremendous pressures, a lack of resources, and a substantial imbalance of power when we engage with proponents. As a result, we often find ourselves relying on proponents committing to, and living up to, best practices. This reliance takes trust – trust which is undermined when a proponent appears to simply want to “run the [regulatory] gauntlet” and who approaches Métis engagement as simply a regulatory afterthought or a “check the box” exercise. If Denison remains unclear about why the events this spring caused so much concern, I would encourage you to view the entirety of our engagement through the lens of MN-S, from our initial expectations, to the pressure exerted by Denison, to the very real sense of disrespect and powerlessness, in terms of the specific meetings, the tenor of our overall relationship, and Denison’s regulatory approach.

Approach to Move Forward

What we hope to receive from Denison is a commitment to (1) work with us through an informed, balanced and appropriately resourced manner – where Métis participation is infused throughout the process in a manner that reflects best practices; (2) work in good faith to rebuild the trust that has been lost during past engagement – understanding that reconciliation requires both an understanding of the past and a desire to move forward; and (3) a commitment to begin discussions around life-of-project accommodation and cooperation, and the potential for securing Métis consent for the project with each party

¹ As noted before, we have limited resources to address a province-wide duty-to-consult portfolio.



acting in good faith and reasonably (having consideration to other recent examples of collaboration seen across the country). While I appreciate that consent is not a legal requirement where Aboriginal title has not been proven, a commitment to meaningfully seek consent reflects best practice and aligns with the guidance of the Supreme Court of Canada (*Tsilhqot'in Nation* para 97).

The paragraph above is not intended as an ultimatum (again, recognizing that we do not hold a veto), but instead outlines what I believe is a reasonable approach to helping us move forward and rebuild trust.

Concerns during the Meeting

I am concerned by several of the statements that you made near the end of the Meeting, and since we ran out of time during the meeting, I am providing a written response.

1. Meetings in the Fall and Exploration Agreement

As I have said in the past, MN-S has an interest in working with Denison with respect to the Wheeler River Project. That said, we are engaging with very limited capacity. By the fall of 2020, we had spent about \$100,000 of our own money engaging with Denison and on the project – including several meetings with Denison, ongoing negotiations, a meeting with our Locals before the COVID lockdown, and addressing CNSC's initial omission of MN-S, on its own behalf and on behalf of NR1, NR2 and NR3, as a relevant Indigenous party. This amount of money represented a substantial and material portion of the duty to consult budget (which is intended to address the entire province). To that point, we were working with Denison on an exploration agreement and MOU that we hoped would address these historic costs.

In the fall Shannon and Carolanne connected at Denison's request to talk about hosting "community meetings." I know that Shannon received a budget from Carolanne during this process.²

In the fall I was contacted by Denison about providing support for engagement meetings and asked Shannon to connect with Denison (Carolanne). about how and when the MN-S would participate in the "community meetings". I know Shannon received a budget from Carolanne during this process but due to the timing of submission and other MN-S priorities this was not reviewed.

Our engagement during this period was in good faith. Perhaps it was naive, but we expected at the time that this was an early opportunity to collaborate ahead of us rolling-

² In the past, Mr. Cates has stated that this engagement has occurred over "months". I understand that Carolanne has corrected this, but to be clear, the engagement was limited to a few meetings over a few weeks.



out a process and engagement plan that we would jointly develop. During this period we had limited involvement from legal counsel (for budget reasons) and did not have technical/process advisors available to review.

It was during this period that I first became concerned that “the cake was already baked” and that Denison was a lot further along in its regulatory preparations than we had understood. This was significant for several reasons:

- a. Denison had not reached out to us to collaborate on the process timeline, overall approach, and approach to gathering and incorporating Métis input, which seemed inconsistent with their apparent commitment to follow best practices;
- b. By having MN-S facilitate the meetings, the MN-S would be at risk of seemingly approving a process that we didn't understand and hadn't been meaningfully engaged in developing;
- c. the Denison workplan contained no funding for technical or legal support to help us understand the full context for what was being presented, and the process involved;
- d. given Denison had informed us that the Project had been on hiatus due to COVID, it was surprising to realize that they had been actually making significant strides in developing their regulatory approach without us; and
- e. we were hoping to build trust, get clarity on the agreements under negotiation with Denison in order to understand whether we would be in a position to recover the significant investment we had put into the project to-date, and promote clarity in terms of our approach to engagement.

At this stage, I asked Shannon to put the meetings on hold until we had more clarity. After the holidays we started taking steps to get clarity (understanding again that my department has limited resources and bandwidth to address unfunded issues). In particular, we:

- a. shared updated drafts of the agreements under negotiation with Denison for Denison's review; and
- b. began a process of finding technical advisors who could assist us in understanding what best practices are and what would be reasonable expectations for MN-S (this ended up taking several months - I note that we have struggled to find technical advisors locally since most of them work, or want to work, for the uranium mines).

In March we met with Denison to seek a pathway forward. At this meeting Denison repeatedly accused me and our CEO of refusing to participate unless they signed an exploration agreement. In response, we both said “no” – and that we were looking to build



a relationship and meaningfully collaborate, and that we didn't realize that the agreements under negotiation were in dispute since we had heard nothing from Denison. It was only at this point that Mr. Cates said that they had "reached an impasse" on the agreements – which CEO Richard Quintal noted as surprising since they had never communicated this with us.

At the conclusion of the meeting MN-S resolved to work with our newly retained technical experts and identify a pathway forward on engagement, and Denison agreed to return agreement edits. While both parties committed to provide the materials by the end of the following week, MN-S provided its feedback on the engagement process a week late on April 9th. Denison did not provide an update on its own commitment until April 22nd.

I note again that we have been required to fund the deliverables to-date.

2. Denison's Engagement

During our call, Mr. Hoekstra noted that your slide appeared to suggest that Denison had been trying to work with MN-S uninterrupted between 2019 and 2021, which was not the case. I was disappointed that instead of simply recognizing that the slide didn't appear accurate (or suggesting that it has been misinterpreted), you suggested that Mr. Hoekstra was being untruthful in his comments. While it may not seem like a material issue, it raises a number of concerns including:

- a. A continuing approach by Denison to avoid showing contrition;³
- b. A continuing effort to "spin" everything, even when it's for things that shouldn't matter; and
- c. A lack of respect for our team and the Métis Nation we represent.

I am providing our record of engagement below so that you understand the basis for my concerns:

- a. On February 12, 2020, you emailed Mr. Hoekstra saying that Denison would be reviewing certain documents he had shared and that you hoped to connect before the end of the week.
- b. February 19, 2020 Carolanne emailed me to suggest an entirely different meeting within a week to meet with their consultants – I was not available but suggested a meeting a month later when I had capacity.

³ I observed during our lengthy discussion regarding the concerning municipal meetings, that the only indication of contribution on the part of Denison (even if only to recognize our frustration) came from Janna, who, to my understanding, wasn't even involved in meetings.



- c. On March 19, 2020 Mr. Hoekstra followed up with you regarding the documents mentioned in your email of February 12.
- d. On March 19, 2020 you informed us (me, our CEO, and Mr. Hoekstra) that a letter would be forthcoming from Carolanne.
- e. On March 19, 2020 Carolanne send a letter written from you to MN-S President McCallum stating that Denison was suspending the EA, and that while you had been working diligently to return a copy of the agreements, you would no longer be doing so because of the suspension.
- f. On April 9, 2020 MN-S CEO Richard Quintal sent a letter to you encouraging Denison to work with MN-S during the period of lull in order to take advantage of additional time and build a relationship.
- g. On August 21, 2020 our counsel Mr. Hoekstra and Mr. Isaac met virtually with you and Mr. Millen.

The record above is not to suggest that Denison has done anything wrong by pausing its engagement, but I am not sure how you can suggest that this pause didn't occur. You mentioned on the call that you may have "spoken to the President." If you think it's relevant to understanding your assertions to Mr. Hoekstra, I'd invite you to provide context, as well as an explanation why that meeting was relevant to your comments, particularly when CEO Richard Quintal, Mr. Hoekstra, and I were waiting for Denison to re-engage during this period. Again, I am not trying to suggest that Denison did anything wrong during the period concerned – I am trying to understand why you thought it was necessary to try to discredit a statement of our team member that, to me at least, looks entirely uncontroversial and immaterial.

Next Steps

I hope the above has been helpful in promoting mutual understanding. To-date, I feel like Denison has just tried to dictate things, both in terms of their process and in their interpretations of past events (again noting that I have received a number of lengthy letters from you in the past), but has not taken steps to truly listen to us or try to understand our concerns. I remain optimistic that if we can both learn and grow through these points of engagement, we can begin rebuilding our relationship. You have my commitment that I will do my part in good faith.

I have listed below a few items that I understand will be tackled in the coming week or so:

- a. MN-S counsel will circulate a capacity funding agreement for Denison's review that will guide us moving forward, incorporate the proposed workplan, and information ownership and disclosure provisions;



- b. Any questions or feedback Denison has regarding the workplan will be shared so that we can finalize workplan schedule; and
- c. MN-S will provide a “principles document” that identifies what we understand as the points of disagreement in the current documents in order to hopefully move forward, or at least understand the points of contention.

In addition to the above, we should schedule a follow-up meeting for a few weeks from now to discuss the deliverables.

Sincerely,



Mark Calette
Senior Director of Lands and Consultation
Métis Nation – Saskatchewan

cc: Shannon Landrie-Crossland, Duty to Consult Liaison Officer, Métis Nation –
Saskatchewan
Arend Hoekstra, Legal Counsel, Cassels Brock & Blackwell LLP
Ryan Froess, Senior Policy Advisor, Indigenous and Stakeholder Relations Division,
Canadian Nuclear Safety Commission



Meeting Agenda Follow up Meeting with MN-S; July 7th 2021

1. MN-S thoughts on the June 25th Meeting
2. CNSC thoughts on the June 25th Meeting
3. Path Forward – MN-S plans to move forward with Denison
4. Closing and Next Steps forward with CNSC

No official minutes were taken

From: [David Cates](#)
To: [Hoekstra, Arend J.A.](#)
Cc: [Glen McCallum](#); [Mark Calette](#); [Millen, Roy](#); [Froess, Ryan](#);
Subject: Follow Up to Meeting on June 25th
Attachments: [2021-07-07.Ltr_to_MNS_re_June_25_2021_Meeting+vFinal .pdf.DRF](#)
Sent: 2021-07-07 11:33:53 AM

Hi Arend,

I hope all is well in Vancouver and that you survived the record setting heat wave.

Please see the attached letter as a follow-up to the MNS-Denison-CNSC meeting on June 25th.

As noted in the letter, we have received Mark Calette's letter from July 5th and we are in the process of reviewing. As a procedural matter, could you please comment as to whether we are supposed to respond to Mark's letter directly or if our response should be to you, as per the previous instructions we have received from yourself and the MNS to direct all correspondence to MNS' legal counsel?

Best,
David

David Cates
President and Chief Executive Officer

t: 416-979-1991 x362 | c: 416-802-1635 | f: 416-979-5893
1100 - 40 University Ave
Toronto, ON, Canada, M5J 1T1



TSX: DML | NYSE MKT: DNN
www.denisonmines.com

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July 7, 2021

Métis Nation - Saskatchewan
c/o Cassels Brock & Blackwell LLP
Attn: Arend Hoekstra
Suite 2200, 885 West Georgia St.
Vancouver, BC V6C 3E8

Dear Mr. Hoekstra,

I am writing to follow-up on our joint meeting with the Canadian Nuclear Safety Commission on June 25, 2021. We have addressed this correspondence to you in accordance with the previous direction of Métis Nation - Saskatchewan (MN-S), but if this correspondence should be sent directly to another MN-S representative, please advise so that we can redirect future correspondence.

On behalf of Denison Mines Corp. (Denison), I would like to thank the MN-S team for their participation in and preparation for the joint meeting. We appreciated the transparency and openness which the MN-S brought to the discussion. I am hopeful that the meeting will prove to represent an opportunity for both parties to re-set our relationship with a clear division between without-prejudice commercial negotiations and on-the-record engagement / Indigenous consultation in respect of the Wheeler River environmental assessment process. My hope is that doing so will help us to achieve a positive working relationship underpinned by mutual respect and trust – a concept that I believe, from our various discussions, is shared by myself and MN-S President Glen McCallum. Denison has already been successful in changing the norm for industry engagement and cooperation with the Indigenous people of northern Saskatchewan, and we welcome the opportunity to do the same with the MN-S.

In order to move forward, however, I feel it appropriate to raise with you a serious concern that I have around the meeting on June 25th. I found that portions of our meeting did not align with Denison's expectations of respectful engagement practices and our corporate policies. While engagement requires honest and authentic discussions about challenging and sometimes personal topics, it is essential that all participants in such discussions act professionally and respect the rights and contributions of others. Denison's corporate policies are available on our website, and specifically prohibit, amongst other things, actions or words that are known or should be known to be offensive or demeaning, and behaviour that intimidates, insults, or bullies anyone in the workplace. I expect all Denison staff to comply with our policies and I have an obligation to ensure all Denison staff are afforded the protection of these policies.

Reflecting on our meeting from June 25th, I am particularly concerned about the MN-S comments directed towards Carolanne Inglis-McQuay and the allegations around her honesty and the professionalism of her conduct in leading Denison's Indigenous relations efforts for the Wheeler

River Project. Carolanne is an experienced corporate social responsibility professional that is well respected by many Métis citizens that have worked closely with her in the past - recognizing that she takes great pride in her work and has been a champion of Métis Rights and interests within Denison. While we welcome feedback from the MN-S regarding our engagement activities, I believe Carolanne was unfairly attacked in a public manner that is not consistent with Denison's values or policies. Going forward, if participant conduct violates respectful engagement practices or Denison's corporate policies, we reserve the right to adjourn or suspend those activities to protect our staff and preserve our relationship with the MN-S.

I confirm that Denison has received a letter from Mark Calette dated July 5, 2021. I am considering the concerns he has raised within that letter and will respond in due course. In the meantime, I confirm that Denison remains committed to moving engagement discussions forward with the MN-S in a positive and timely manner. To that end, I have directed Denison's legal counsel to work with MN-S' legal counsel on a draft capacity funding agreement, which is expected to provide a framework for the funding of engagement activities and management of confidential information. Additionally, I will be directing the Denison engagement team to resume working with the MN-S engagement team to develop a new mutually acceptable workplan and schedule for engagement activities in respect of the Project, which can then be incorporated into the draft capacity funding agreement.

If you would like to discuss any of these matters, please contact me by phone at 416-802-1635.

Yours very truly,



David Cates
President & Chief Executive Officer
Denison Mines Corp.

cc: Glen McCallum, President, Métis Nation – Saskatchewan
Mark Calette, Senior Director of Lands, Métis Nation – Saskatchewan
Roy Millen, Blake, Cassels & Graydon LLP
Ryan Froess, Senior Policy Advisor, Indigenous and Stakeholder Relations Division,
Canadian Nuclear Safety Commission

From: [Froess, Ryan](#)
To: s.nickolet@mns.work; [Mark Calette](#); slandriecrossland@mns.work;
Cc: [Phaneuf, Marcelle](#); [Nicole Frigault \(nicole.frigault@cnscccsn.gc.ca\)](mailto:nicole.frigault@cnscccsn.gc.ca); [Adam Levine \(adam.levine@cnscccsn.gc.ca\)](#);
Subject: MN-S/CNSC Meeting - NexGen/Denison EAs - July Meeting
Sent: 2021-07-28 5:22:00 PM

Follow Up Flag: Follow up

Flag Status: Flagged

Good afternoon everyone,

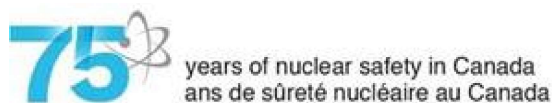
Thanks for the meeting today and great to meet you Mr. Morin. If you could please forward this email onto him that would much appreciated and I will include him in all of our future correspondence moving forward.

I did write down a few notes today (which I will share) and a few Action items which I have provided below for our next meeting scheduled for late August.

1. Send out CNSC presentation from our June 23rd Meeting on EA process, timelines, and opportunities for collaboration – attached and complete
2. Provide a Draft ToR in early August for MN-S review and discussion for our next meeting – CNSC (Ryan)
3. Re-schedule August 25 MN-S/CNSC Meeting for the first week of September and then monthly (or as needed) there after – Ryan and Sydney

Thanks,

Ryan Froess
Senior Policy Advisor, Indigenous and Stakeholder Relations Division
Canadian Nuclear Safety Commission
ryan.froess@cnscccsn.gc.ca | Cell: 306-914-7892



Meeting with MN-S & CNSC: September 8th 2021

General Update:

- MN-S indicated moving along slowly and things seem to be improving at the working level but not at the Senior Management level as they are still having problems coming to agreements on how to work together. Shannon and Sydney from the MN-S have been working with Janna and Jen (Denison) and hope to be meeting with larger group (both Denison and MN-S) in early October on some technical sessions.
- Monthly meetings are planned with MN-S on the project moving forward and these discussions with help to shape how MN-S would like to be consulted on the Wheeler River Project by the CNSC and what opportunities they are interested in pursuing to work in collaboration.

From: [Sydney Nickolet](#)
To: [Froess, Ryan](#)
Cc: [Mark Calette](#); [Shannon Landrie-Crossland](#); [Hoekstra, Arend J.A.](#);
Subject: MN-S and CSNC TOR - MN-S Comments
Attachments: E-DOCS-#6617120-v1-DRAFT-_Terms_of_Reference_between_MN-S_and_CNCS_for_Rook_1_and_Wheeler_- (CBB Oct 20).docx; E-DOCS-#6617120-v1-DRAFT-_Terms_of_Reference_between_MN-S_and_CNCS_for_Rook_1_and_Wheeler_- _Aug_2021 - E-DOCS-#6617120-v1-DRAFT-_Ter~1.pdf;
Sent: 2021-10-20 6:12:59 PM

Good afternoon Ryan,

Thank you for taking the time to meet with MN-S this afternoon regarding the Terms of Reference. As promised, please see attached comments from MN-S on the document.

Best,

Sydney Nickolet (she/her/hers)
Jr. Lands and Consultation Liaison Officer

306-381-5286

310 - 20th Street East
Saskatoon, Saskatchewan
Canada S7K 0A7

Heartland of the Métis and Treaty 6 Territory



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From: [Walter Smith](#)
To: [Froess, Ryan](#)
Cc: [Interventions / Interventions \(CNSC/CCSN\)](#); [Alex Ross](#); [Mike Natomagan](#); [Billie Jo Natomagan](#);
Subject: Removal of Delegation
Attachments: [Denison Wheeler River Project - Formal Letter.pdf](#); [Denison Wheeler River Project.pdf](#);
Sent: 2021-11-24 7:49:05 AM

Follow Up Flag: Follow up

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Good morning, Ryan, please find attached a formal letter indicating that we are removing all delegations previously assigned for Kineepik Metis Local(KML) in relations to the Denison Mines. For clarity KML will manage all Duty to Consult processes for projects that occur on and adjacent to our mapped territory.

Additionally, we would like to request a meeting with the CNSC to learn about increasing Uranium project activity that may affect our protected rights. We would be pleased to host a meeting for CNSC about the efforts we have developed in communicating with our traditional land users and our community members including sharing our digitally mapped territory.

We are also curious on what specific conversations are occurring within the CNSC since Canada has signed UNDRIP.

Sent from [Mail](#) for Windows



Kineepik Metis Local

Friday, November 12, 2021

Government of Saskatchewan
Director, Aboriginal Consultation Unit
Lands and Consultation Branch
220 - 1855 Victoria Avenue
REGINA, SK S4P 3T2
Toll free: 1-877-879-7099
Email: Aboriginal.Consultation@gov.sk.ca

To Whom it May Concern:

Please consider this letter as formal notification effective immediately that Kineepik Metis Local #9 (KML) will manage all aspects of the Duty to Consult and Accommodation process for the Denison Mines, Wheeler River Project. All previous delegations are now removed.

Sincerely,

Mike Natomagan
President, Kineepik Metis Local #9

cc: Alex Ross, Executive Director KML
Glen McCallum, MNS President
David D. Cates President & CEO

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