



CMD 25-H9.4

Date: 2025-10-15

**Written Submission from the
Saskatchewan Mining Association**

**Mémoire de la
Saskatchewan Mining Association**

In the matter of

À l'égard de

Denison Mines Corporation

Licence Application to Prepare Site and
Construct for Denison Mines' Wheeler
River Mine and Mill Project

Denison Mines Corporation

Demande de permis pour la préparation de
l'emplacement et la construction du projet
de mine et d'usine de concentration
d'uranium Wheeler River de Denison Mines

Commission Public Hearing

Audience publique de la Commission

December 2025

Décembre 2025

October 15, 2025

Senior Tribunal Officer, Registry
Canadian Nuclear Safety Commission
280 Slater Street
P.O. Box 1046, Station B
Ottawa, Ontario K1P 5S9
via e-mail: cnsccsn@canada.ca

RE: SMA Written Intervention – Denison Mines Corp. Wheeler River Project - In Support of the Environmental Assessment and Application for the Licence to Prepare a Site for and Construct a Uranium Mine and Mill: 2025 CMD25-H9

The Saskatchewan Mining Association (SMA) is the voice of the exploration and mining industry that operates in Saskatchewan and has the role of liaison and advocacy agent with provincial and federal governments and the public to advance the sustainable development of the mineral resources of the province.

Our mission is to advance a safe, sustainable, and globally competitive exploration and mining industry in Saskatchewan that benefits all residents of the province

The SMA represents over 50 mining and mineral exploration companies operating in the province and our members are leading global producers of critical minerals potash (>33%) and uranium (>24%) that contribute to global food and clean energy security for the world's growing population. Our members also explore for and produce coal, copper, gold, salt, nickel, zinc, lithium, graphite, rare earth elements and more.

Environmental, Social, and Governance (ESG) performance are integral to the activities of SMA members, and for decades our members have been Canadian and international leaders in including Indigenous peoples, businesses, and communities in their operations. As an example, in 2024, Saskatchewan mining operations purchased over \$913 Million in goods and services from Indigenous-owned businesses.

The SMA provides this intervention in support of Denison Mines Corp.'s (Denison) application for two critical regulatory decisions before the Canadian Nuclear Safety Commission (CNSC) regarding its Wheeler River Project:

1. The CNSC's decision concerning the acceptability of the Environmental Assessment (EA) for the Project under the *Canadian Environmental Assessment Act, 2012* (CEAA, 2012).
2. Denison's application for a Licence to Prepare a Site for and Construct a Uranium Mine and Mill under the *Nuclear Safety and Control Act*.

The SMA strongly supports Denison's application, recognizing the company's extensive expertise, commitment to high standards, and the adoption of modern, protective mining techniques. Denison brings over seven decades of experience in uranium mining, environmental stewardship, and regulatory compliance to the development of this next uranium project. The company holds current CNSC licenses for other activities and operates fully in compliance with established terms and permits.

Denison's Wheeler River Project represents a new chapter in uranium mining innovation and sustainability in Saskatchewan. While In-Situ-Recovery (ISR) is currently the primary mining method for extracting over 50% of the world's uranium, in countries including Kazakhstan, USA, Uzbekistan, Australia, Russia and China, Denison's Wheeler River Project will be Canada's first ISR uranium mine—an approach that minimizes surface disturbance, reduces greenhouse gas emissions, and provides for progressive reclamation. ISR technology allows for the extraction of uranium with no open pit, no waste rock piles, and no tailings management facility, significantly reducing the project's environmental footprint while maintaining robust protection for workers, the public, and the environment.

SMA recognizes that Denison has demonstrated industry-leading standards of environmental stewardship, comprehensive community engagement, and proactive collaboration with Indigenous Nations and communities throughout the project's development. Denison's approach reflects the principles of the CNSC's Regulatory Framework, the Province of Saskatchewan's expectations for sustainable development, and best practices under international nuclear and environmental standards.

The Wheeler River Project also contributes to broader provincial and national objectives, including advancing Canada's position as a global leader in the supply of responsibly sourced uranium that supports clean energy generation and emissions reduction worldwide. The project will create employment opportunities, strengthen the provincial supply chain, and generate significant long-term benefits for northern Saskatchewan communities.

Denison's environmental assessment has shown that the project can be developed in a safe, sustainable, and socially responsible manner, with no unreasonable risk to people or the environment. The company has also committed to robust environmental protection measures, extensive monitoring programs, and transparent engagement throughout the project lifecycle—from construction through operation, decommissioning, and eventual transition to long-term management under Saskatchewan's Institutional Control

Given the comprehensive nature of the Environmental Impact Statement, the commitment to minimizing environmental impact through innovative technology, and the confirmed support of key Indigenous communities, the SMA urges the Commission to:

- Conclude the Environmental Assessment process is complete and satisfactory.
- Approve Denison's Application for a Licence to Prepare a Site for and Construct a Uranium Mine and Mill.

We thank you for the opportunity to share our views in this written intervention to indicate our support for Denison Mines Corp.'s Wheeler River Project.

Yours sincerely,



Pam Schwann, MSc. P. Geo.
President

cc David Cates, President and CEO, Denison Mines
Janna Switzer, Vice President, Environment, Sustainability and Regulatory, Denison Mines
Brad Sigurdson, SMA Vice President, Environment, Safety and Regulatory Affairs