



CMD 25-H9.29

Date: 2025-10-31

**Written Submission from the
Métis Nation - Saskatchewan**

**Mémoire de la Nation métisse
de la Saskatchewan**

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



Senior Tribunal Officer, Commission Registry
Canadian Nuclear Safety Commission
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October 31, 2025

Re: Hearing 2025-H-09 – Request to Intervene and Written Submission

Taanishi,

The Métis Nation – Saskatchewan (“**MN-S**”), including in respect of Northern Region 1 (“**NR1**”), Northern Region 3 (“**NR3**”), and the 13 Locals of NR1 and NR3, writes to request to intervene in the Commission of the Canadian Nuclear Safety Commission’s (“**CNSC**”) (“**Commission**”) Hearing 2025-H-09 regarding Denison Mines Corp.’s (“**Denison**”) Wheeler River Project (“**Project**”). The MN-S also writes to provide its written submissions.


The Project is located within the Northwest Saskatchewan title claim which the MN-S is actively advancing, which Canada has agreed to negotiate¹ and which the Supreme Court of Canada commented on in its February decision of *Saskatchewan (Environment) v. Métis Nation – Saskatchewan*.² The lands covered by the title claim are historically significant to the Métis Nation’s history, culture and economy.

The Project will significantly impact Métis rights, through:

- a) the “denuding” of the lands and resources of the title claim, which is the inheritance of the Métis;

¹ Framework Agreement for Advancing Reconciliation between Métis Nation – Saskatchewan and Her Majesty the Queen in Right of Canada, July 20, 2018, p 2, PDF 2 of 12, available: [Framework-Agreement-for-Advancing-Reconciliation-2018.07.pdf](#).

² *Saskatchewan (Environment) v. Métis Nation – Saskatchewan*, 2025 SCC 4.

- 
- b) alienating the Métis from these lands, as a result of increased industrial activity and concerns about the health and safety of using the lands and resources even after the mine has closed;
 - c) potentially depriving future generations of commercial harvesters, including commercial fishers, of a market for their rights-based harvesting; and
 - d) adding additional stress on wildlife that support Métis customs, culture and economy, including caribou.

The above-listed concerns have not been adequately addressed in the Final Environmental Impact Statement (“**FEIS**”). Any approval of the Project should be withheld until the full extent of the impacts on the Métis have been properly understood and either:

- a) the consent of the Métis Nation is secured; or
- b) the potential impacts on the Métis Nation are fully understood and recognized, and accommodated where appropriate.

The MN-S notes that it is currently in discussions with Denison, as of the date of this submission, for the purpose of identifying opportunities to secure the consent of the Métis Nation. The MN-S submits that, absent agreement by Denison and the Métis Nation, the Crown must involve itself in such consent based-discussions, including through processes aimed at appropriately understanding the impacts and losses the Métis will experience if the Project is permitted to proceed.

The MN-S has retained Two Worlds Consulting (“**TWC**”), Gebauer & Associates (“**Gebauer**”), GEM Services (“**GEM**”) and Impact Economics (“**IE**”) to conduct a technical review of the FEIS. This technical review of the FEIS (“**Technical Review**”) is included as Appendix “A” hereto. The Technical Review includes engagement with Métis Citizens in NR1 and NR3. In this letter, the MN-S highlights key findings of the Technical Review and places them in the context of the Métis Nation’s rights and interests.



Request to Intervene

The MN-S, including in respect of NR1 and NR3, and the 13 Locals of NR1 and NR3, requests to intervene on the Commission’s Hearing 2025-H-09 on the environmental assessment of the Project pursuant to the *Canadian Environmental Assessment Act, 2012*³ and the licencing of the Project pursuant to the *Nuclear Safety and Control Act*.⁴ Pursuant to Rule 19(1) of the *Rules*, the MN-S has both an interest in and expertise and knowledge useful for the Commission’s decision on the Project.

The Aboriginal rights of the Métis Nation are recognized under Section 35 of the *Constitution Act, 1982*, as confirmed by the Supreme Court of Canada in *Powley*.⁵ Saskatchewan courts have affirmed the rights of the Métis Nation in Saskatchewan and covering the Project site specifically. For instance, in *R. v. Morin and Daigneault*,⁶ the Saskatchewan Provincial Court (affirmed by the Court of Kings Bench for Saskatchewan) found that Métis rights to fish covered an area “loosely known as Treaty 10 or perhaps a little larger”.⁷ The Métis Nation also claims Aboriginal title to the Project area, as detailed below.

Canada has a constitutional obligation to consult whenever it takes action that may adversely affect the Métis Nation’s claimed Aboriginal rights and title.⁸ This is a deep obligation grounded in the solemn commitment the Crown has made to recognize and affirm Aboriginal rights and title.⁹

The Project may have significant effects on the Métis Nation, including NR1, NR3, and the 13 Locals of NR1 and NR3. The Commission has recognized that the MN-S and

³ SC 2012, c 19, s 52.

⁴ SC 1997, c 9.


⁵ *R. v. Powley*, 2003 SCC 43.

⁶ 1996 CanLII 12081 (SK PC).

⁷ *R v. Morin and Daigneault* at para 20.

⁸ *Haida Nation v. British Columbia (Minister of Forests)*, 2004 SCC 73, para 35 (“**Haida Nation**”).

⁹ *Haida Nation*, para 33.



NR1 and NR3 “should be explicitly identified as having potential interests in the Wheeler River Project.”¹⁰

The MN-S is the representative of the rights of the Métis Nation in Saskatchewan affected by the Project. The Federal Court has recognized that “section 35 rights matters such as title ... are held at the Nation level”.¹¹ The MN-S is the government of the Métis Nation in Saskatchewan, as agreed to by Canada in the 2023 Métis Nation within Saskatchewan Self-Government Recognition and Implementation Agreement between the MN-S and His Majesty the King in Right of Canada (“**Self-Government Agreement**”).¹² The Self-Government Agreement recognizes that the MN-S is exclusively mandated to engage in consultation with Canada where Canada’s conduct has the potential to adversely impact Métis rights within Saskatchewan.¹³


In addition to the Métis Nation’s clear interest in the Project, the Métis Nation has expertise and knowledge which is useful to the Commission in coming to a decision on the Project. As detailed in the Technical Review, Métis Citizens have generations of experience and knowledge from using the land around the Project site. As just one example of this experience, Métis Citizens fish in the major lakes downstream from Project, including commercial fishing in Russell Lake. Métis Citizens have hunted, harvested, fished, travelled, camped and lived around the Project site. These activities have built deep Métis knowledge regarding the lands, air, waters and wildlife of the Métis Homeland. That knowledge is useful to the Commission in making decisions on the Project.

¹⁰ Canadian Nuclear Safety Commission, President Rumina Velshi, Letter to Métis Nation – Saskatchewan, January 2020.

¹¹ *Kebaowek*, para 150.

¹² Métis Nation within Saskatchewan Self-Government Recognition and Implementation Agreement between Métis Nation – Saskatchewan and His Majesty the King in Right of Canada as represented by the Minister of Crown-Indigenous Relations, available: https://metisnationssk.com/wp-content/uploads/2023/02/MNS_FED-SGRIA_02-24-2023.pdf. The Self-Government Agreement is attached hereto as Attachment 2.

¹³ Self-Government Agreement, Chapter 5, section 5.02(e)(ii).



The MN-S also confirms pursuant to Rule 19(4)(d) that it wishes to participate orally in the Hearing on the Project. The Commission would benefit from an oral explanation of the Métis Nation’s Métis knowledge and expertise, and the opportunity for an oral exchange with Métis Citizens and representatives.

MN-S Submissions

The Commission must consider UNDRIP in its decisions on the Project

The Commission must consider UNDRIP in its decisions on the Project. Canada has adopted UNDRIP into Canadian law by passing the *United Nations Declaration on the Rights of Indigenous Peoples Act* (“**UNDA**”).¹⁴ Recently, in *Kebaowek First Nation v. Canadian Nuclear Laboratories* (“**Keboawek**”)¹⁵ the Federal Court affirmed that “Canada’s adoption of the UNDRIP into Canadian law via the *UNDA* must mean more than a status quo application of the section 35 framework.”¹⁶ Among other things, UNDRIP and the *UNDA* guide the “Crown’s analysis of the duty to consult and accommodate.”¹⁷

UNDRIP requires the Crown to seek the free, prior and informed consent of Indigenous peoples through consultation

Guided by UNDRIP, the Crown must seek the free, prior and informed consent (“**FPIC**”) of Indigenous peoples affected by development. To seek the FPIC of Indigenous peoples, the Crown must consult “with Indigenous peoples in a manner that respects their processes and with the objective of reaching an agreement.” [emphasis added]¹⁸ Such “[p]rocesses that meaningfully accommodate the Indigenous collective’s perspectives ensure that the necessary trust and give and


¹⁴ SC 2021, c 14.

¹⁵ 2025 FC 319

¹⁶ *Kebaowek*, para 128.

¹⁷ *Kebaowek*, para 128.

¹⁸ *Kebaowek*, para 111.



take required to nourish the ongoing Crown-Indigenous relationship will be reinvigorated and strengthened over time.”¹⁹

Kebaowek provides an example of the kinds of consultation processes necessary to meet the FPIC standard. In *Kebaowek*, the Federal Court remitted back to the CNSC the approval of a proposed near surface disposal facility (“**NSDF**”), on the basis of the failure to properly consult the Kebaowek First Nation.²⁰ The Federal Court found that the CNSC’s existing processes to consider the duty to consult and accommodate did not discharge that duty “through the interpretive lens” of UNDRIP and the standard of FPIC and so were deficient.²¹

The Federal Court directed the CNSC to conduct a further process with a view to incorporating Indigenous “law, knowledge, and practices into their processes, and to work towards achieving an agreement.”²² That process had to involve both the CNSC as regulator and representative of the Crown, and the proponent.²³ The goal of reaching an agreement is particularly important in the case of the MN-S and the Project because of the Project’s deep impacts to Métis rights and Métis Aboriginal title lands. The Federal Court provided 19 months for the parties to seek an agreement in relation to the NSDF.²⁴

UNDRIP requires the FPIC of the Métis Nation for the Project

The Project aims to develop Métis lands, subject to an ongoing Métis title claim and a commitment by Canada to negotiate such claim. The Project will denude the Métis title lands before the Métis claim is established and will release hazardous materials into the environment. Accordingly, the FPIC of the Métis Nation is required for the Project pursuant to Articles 29(2) and 32(2) of UNDRIP:

¹⁹ *Kebaowek*, para 139.


²⁰ *Kebaowek*, para 229.

²¹ *Kebaowek*, para 212.

²² *Kebaowek*, para 223.

²³ *Kebaowek*, para 223.

²⁴ *Kebaowek*, para 224.

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- Article 28(1): Indigenous peoples have the right to redress, by means that can include restitution or, when this is not possible, just, fair and equitable compensation, for the lands, territories and resources which they have traditionally owned or otherwise occupied or used, and which have been confiscated, taken, occupied, used or damaged without their free, prior and informed consent.
 - Article 29(2): States shall take effective measures to ensure that no storage or disposal of hazardous materials shall take place in the lands or territories of indigenous peoples without their free, prior and informed consent.
 - Article 32(2): States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and other resources, particularly in connection with the development, utilization or exploitation of mineral, water or other resources.


The consultation on the Project must therefore be assessed through the lens of FPIC and the wrongful deprivation of the lands and resources from the Métis Nation. For the Commission to find Project consultation adequate to the FPIC standard, Denison and the CNSC must have:


- included Métis Nation's perspectives, laws, knowledge and practices in the consultation process;
- sought genuine agreement with the Métis Nation, through a give and take; and
- allowed sufficient time for the consultation process.

UNDRIP protects the Métis Nation's substantive rights in relation to the Project

The Project also may violate several of the Métis Nation's UNDRIP rights, which are core to the Métis Nation's identity and also protected under Section 35 of the *Constitution Act, 1982*²⁵, including:

²⁵ Schedule B to the Canada Act 1982 (UK), 1982, c 11,

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- Article 11(1): Indigenous peoples have the right to practice and revitalize their cultural traditions and customs. This includes the right to maintain, protect and develop the past, present and future manifestations of their cultures, such as archaeological and historical sites, artefacts, designs, ceremonies, technologies and visual and performing arts and literature.
 - Article 12(1): Indigenous peoples have the right to manifest practice, develop and teach their spiritual and religious traditions, customs and ceremonies; the right to maintain, protect, and have access in privacy to their religious and cultural sites; the right to the use and control of their ceremonial objects; and the right to the repatriation of their human remains.
 - Article 13(1): Indigenous peoples have the right to revitalize, use, develop and transmit to future generations their histories, languages, oral traditions, philosophies, writing systems and literatures, and to designate and retain their own names for communities, places and persons.
 - Article 20(1): Indigenous peoples have the right to maintain and develop their political, economic and social systems or institutions, to be secure in the enjoyment of their own means of subsistence and development, and to engage freely in all their traditional and other economic activities.
 - Article 25: Indigenous peoples have the right to maintain and strengthen their distinctive spiritual relationship with their traditionally owned or otherwise occupied and used lands, territories, waters and coastal seas and other resources and to uphold their responsibilities to future generations in this regard.
 - Article 26:
 - (1) Indigenous peoples have the right to the lands, territories and resources which they have traditionally owned, occupied or otherwise used or acquired.
 - (2) Indigenous peoples have the right to own, use, develop and control the lands, territories and resources that they possess by reason of traditional ownership or other traditional occupation or use, as well as those which they have otherwise acquired.



(3) States shall give legal recognition and protection to these lands, territories and resources. Such recognition shall be conducted with due respect to the customs, traditions and land tenure systems of the indigenous peoples concerned.

- Article 29 (1): Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources. States shall establish and implement assistance programmes for indigenous peoples for such conservation and protection, without discrimination.
- Article 32(1): Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources.

The Commission and Denison must give sufficient weight to the Métis Nation's concerns to reflect the adoption of UNDRIP and these specific articles.

The Technical Review identifies areas for further work with Denison

The Technical Review identifies many important ways in which the Project may impact the lands, air and water of the Métis Homeland, and the Métis Nation's Aboriginal rights and interests, protected under Section 35 of the *Constitution Act, 1982* and UNDRIP. TWC, Gebauer, GEM and IE have also identified several areas where the Denison's assessment and mitigations could be strengthened. This includes in relation to archaeology, engagement, fish and fish habitat, economics, water quality, woodland caribou, and the wellbeing of the Métis Nation and Métis Citizens.

At this time, the MN-S is working with Denison to address these outstanding issues. If Denison is not willing to commit to measures necessary to secure the consent of the Métis Nation, these issues must instead be resolved by the Commission. If Denison is not willing to commit to measures necessary to secure Métis Nation consent, the Commission must impose conditions and assessments to protect the lands, air and water of the Métis Homeland and Métis citizens' ability to exercise their rights on that



Homeland.

The Project will be located on the Métis Homeland and within the MN-S title claim

In addition to the effects identified in the Technical Review, the Project may impact the Métis Nation's rights to Aboriginal title to the Métis Homeland.

The Métis Nation claims Aboriginal title to the Métis Homeland in Saskatchewan, including in the 1994 Northwest Saskatchewan Métis title claim. The MN-S title claim is significant and being actively pursued by the Métis Nation. In January of this year, the MN-S produced more than 3,000 pages of research material and more than 24,000 records in relation to the MN-S title claim. The MN-S has also recently taken other steps to advance the MN-S title claim. In February, the Supreme Court of Canada provided important affirmations regarding the MN-S title claim, including that the claim serves as proper notice for the purposes of the Crown's duty to consult.²⁶


The Project will be located in the area claimed in the title claim and impact the Métis Nation's Aboriginal title. Those impacts could include the alienation of the Métis Nation from their Aboriginal title lands through stigma and avoidance, the loss of the value of the mineral resource, and the loss of the socio-economic value of developing the Project under Métis Nation control. The Métis are concerned that they could succeed in their Aboriginal title claim only to "find their land and resources changed and denuded".²⁷

The Métis Nation is engaged with Denison to identify if there is a jointly acceptable outcome for securing Métis consent the Project, including in a manner that addresses Métis concerns regarding the Aboriginal title claim.

If Denison is not willing to commit to the measures necessary to secure the Métis

²⁶ *Saskatchewan (Environment) v. Métis Nation – Saskatchewan*, 2025 SCC 4 at para 53.

²⁷ *Haida Nation v. British Columbia (Minister of Forests)*, 2004 SCC 73, para 33.



Nation's consent, the Commission must consider the effects of the Project on the Métis Nation's Aboriginal title and should also involve itself in consent-based discussions.


The MN-S notes that the Government of Saskatchewan refused to consider, discuss or accommodate impacts to the Métis Nation's Aboriginal title when assessing the Project. As a consequence, the Commission must take on its own assessment of the Métis title claim, and engage in good-faith dialogue with the Métis Nation aimed at accommodating any impacts to the title claim. The SCC has expressly noted that in the context of a federal environmental assessment, the Government of Canada has a unique and valid interest in the welfare of Indigenous peoples.²⁸ For the Métis Nation, the title claim and the future of its lands and resources is fundamental to its current and future welfare, including of its Citizens.

Conclusion

As detailed in the Technical Review, and this letter, the Métis Nation has a significant interest in ensuring the Project is developed responsibly. The Project has the potential to impact the exercise of Métis Citizen's Aboriginal rights and impact the Métis Nation's Aboriginal title. Those impacts must be considered through the interpretive lens of UNDRIP.

Denison and the Métis Nation are currently in discussions regarding the potential for Métis consent for the Project. However, if Denison is unwilling to commit to acceptable terms for securing the consent of the Métis Nation, the Commission, as the representative of the Crown, must take responsibility for protecting the rights and interests of the Métis Nation and seeking in good faith to secure such consent. Protecting the rights and interests of the Métis Nation would likely require Denison to conduct additional assessments and develop additional mitigations, and would involve the Commission's participation in understanding Métis concerns and identifying measures to accommodate those concerns. The MN-S has detailed these

²⁸ *Reference re Impact Assessment Act*, 2023 SCC 23, para 175.



required assessments and mitigations in prior correspondence, as have TWC, Gebauer, GEM and IE in the Technical Review.

Maarsii, thank you.



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TWO WORLDS
CONSULTING

GUIDANCE WITH INTEGRITY.

**Denison Final Environmental Impact Statement
Technical Review**

Prepared for Métis Nation-Saskatchewan

October 2025

Wheeler River Project

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Review Team

Métis Nation Saskatchewan (MN-S), Northern Region 1 (NR1), and Northern Region 3 (NR3) engaged the following consultancies to support the technical review of the Wheeler River Project's (Project) Final Environmental Impact Statement:

Gebauer & Associates

Gebauer & Associates specializes in environmental consulting with expertise in wildlife biology, and terrestrial and aquatic ecology. Founded in 1989, the Vancouver-based company provides services to industry and government in Western Canada and Nunavut. Gebauer & Associates has a reputation for sound environmental practice, timely service and open communication with clients. The company incorporates a team approach with associates having expertise in a wide variety of disciplines.

GEM Services

GEM Services is the operating name under which Diana Sollner provides independent advisory services in the mining environmental space. Diana Sollner is an engineer with over 25 years' experience in the mining, industrial and renewable energy sectors. Her project work includes environmental impact assessments, water and waste management planning, mine closure planning and due diligence reviews. Her technical areas of expertise are water quality prediction and water management of tailings ponds, water reservoirs, mine rock stockpiles and the potential impact on downstream environments. Her project experience also includes sizing and siting infrastructure (e.g., process plants, water treatment plants and ponds/ditches/reservoirs), developing custom testing protocols and project cost estimating.

In addition to her technical work, Ms. Sollner also chairs the technical advisory committee on mining and metals for GeoScience BC and is a Board Director and Treasurer at the BC Sustainable Energy Association. In the past she also co-chaired the Canadian Institute of Mining's annual tailings management workshop.

Ms. Sollner has Bachelors and Masters degrees in Mining and Mineral Process Engineering and an MBA from the University of Toronto.

Impact Economics

Impact Economics is an economic research firm owned and operated by Mr. Graeme Clinton since January 2004. Mr. Clinton is a professional economist with 30 years of experience, is a recognized expert in the field, and is a regular contributor to the economic discourse in Nunavut and the Northwest Territories. The company is based in Yellowknife, Northwest Territories.

Impact Economics offers economic research, advice, and education services on a range of economic topics, including economic effects assessments, macroeconomic and baseline research, economic modelling, and custom research in such areas as development economics, housing and homelessness, poverty, food security, and local food production (traditional economy), tourism, demographics, and labour.

Impact Economics' mission is to provide economic services that are based on thorough and dedicated research and sound economic principles, the results of which are provided to clients through thoughtful verbal and written presentation.

A guiding principle for Impact Economics is the belief that economics is a study of choices, and the job of an economist is to quantify and qualify the outcomes of choices made and those passed over, and to explain the results in everyday language. In doing their job, an economist helps people, organisations, governments, and companies make informed decisions based on a better understanding of the economic consequences of their choices. To that end, Impact Economics is dedicated to helping clients understand the economy around them

through the delivery of quality work, supporting clients with their economic questions, and sharing knowledge of economic concepts and theory and how they apply to our everyday lives.

Two Worlds Consulting

Two Worlds Consulting is a consultancy that is transforming the social and environmental space. We work collaboratively with First Nations, Métis, Inuit, industry, and other levels of government to support rigorous processes, informed decision-making, and shared prosperity. Our commitment to people—and to more than one perspective—is evident in everything we do.

Our company acknowledges Western and Indigenous Knowledge systems and ways of knowing and values the power of bringing more than one perspective to the table. TWC is committed to upholding a respectful, considerate, and ethical approach to the collection and use of Indigenous Knowledge that is based on mutual trust, transparency, and collaboration with Indigenous nations. Project team members incorporate TWC values in all our work: integrity, reciprocity, trust, and respect—values which are inherent in conducting work with Indigenous nations. TWC applies a number of guiding principles to ensure data is gathered, used, and managed according to nation-determined processes for ownership, control, access, and possession. Shared information is protected in a way that instills trust and promotes data sovereignty for Indigenous participants during the research process.

Alisha Gauvreau, PhD, provided technical review of the Heritage Resources subcomponent of the Land and Resource Use VC of the FEIS on behalf of MN-S, NR1, and NR3. With 15+ years' experience, she specializes in archaeological assessment, impact mitigation, regulatory compliance, and integrating Indigenous knowledge, values, and cultural sensitivity into environmental decision-making.

Eliza Bethune, MPPGA, provided technical review and authorship of the Draft Environmental Impact Statement (DEIS) and FEIS reports on behalf of MN-S, NR1, and NR3. Eliza has 8+ years of experience leading and supporting Indigenous, public, and stakeholder engagement programs and supporting Indigenous knowledge studies for oil and gas, mining, road and rail, policy, contaminated sites, and infrastructure projects, spanning a variety of regulatory jurisdictions.

Jeanne Roy, RPBio, provided technical review of the fish and fish habitat resources subcomponent of the Aquatic Environment VC of Denison's FEIS on behalf of MN-S, NR1, and NR3. Jeanne brings 20+ years of experience in aquatic and fisheries habitat restoration, cumulative effects assessments in aquatic environments, Indigenous engagement, and watershed and natural resource planning.

Heidi Klein, MES, provided senior guidance of the DEIS and FEIS technical review and reports for the Project on behalf of MN-S, NR1, and NR3. Heidi has over 30+ years of experience in the practice of environmental assessment, including legislation advisor, project assessment, socio-economic impact assessment, Indigenous knowledge collection and documentation, cumulative effects assessment, and Indigenous and stakeholder relations.

Disclaimer

This technical review was prepared for Métis Nation Saskatchewan, Northern Region 1, and Northern Region 3. Per the *Ni Mamawaponaan (United As One) Agreement of Principles for Engagement with the Crown and Proponents on Select Projects*, this review was submitted on behalf of the following Métis Regions, Locals, and communities (presented alphabetically):

- Beauval, Local 37
- Canoe River, Local 174
- Cole Bay, Local 41
- Council of Northern Region 1
- Council of Northern Region 3
- Dore/Sled Lake, Local 67
- Green Lake, Local 5
- Île-à-la-Crosse, Local 21
- Jan's Bay, Local 38
- La Ronge, Local 19
- Patuanak, Local 82
- Stony Rapids, Local 80
- Timber Bay, Local 20
- Uranium City, Local 50
- Weyakwin, Local 16

Abbreviations

CEA	Cumulative Effects Assessment
CEAA	<i>Canadian Environmental Assessment Act, 2012</i>
CNSC	Canadian Nuclear Safety Commission
Denison	Denison Mines
DEIS	Draft Environmental Impact Statement
FEIS	Final Environmental Impact Statement
Locals	Local councils of Métis communities
LSA	Local Study Area
MN-S	Métis Nation-Saskatchewan
NR1	Northern Region 1
NR3	Northern Region 3
Proponent	Wheeler River Project owner
Project	Wheeler River Project
RSA	Regional Study Area
TOR	Terms of Reference

1.0 INTRODUCTION

This final Environmental Impact Statement (FEIS) technical review report was prepared for the proposed Wheeler River Project (Project) by Denison Mines (Denison) (the Proponent). This report reviews the FEIS on behalf the Métis Nation Saskatchewan (MN-S), Northern Region 1 (NR1), and Northern Region 3 (NR3), for submission to the Canadian Nuclear Safety Commission (CNSC).

1.1 Métis Rights

Métis rights in Canada, like other Indigenous rights, include the right to self-determination, cultural practices, and land use, and are protected under Section 35 of the *Constitution Act*, 1867. Métis evolved from Indigenous and European cultures, which emerged during the fur trade (Macdougall 2005; Raymond 2013). Eventually, Métis formed their own culture and unique language (Cenerini 2022). From the beginning, Métis culture was embedded in subsistence (e.g., hunting, trapping, fishing, and gathering) and in trade and commercial activities around fur, pemmican, or fish (Vizina 2008).

The concept of a Métis Homeland is distinct from the First Nation definition of “territory”. From a European perspective, it can be understood as a defined space with boundaries. For Métis, this space was shaped by the places occupied, harvested, and travelled during the fur trade, which makes it distinct from how First Nations define their territory. However, like First Nations and learned from First Nations, Métis attachment and connection to the land emphasize that the Homeland is also about the relationship to the land and what the land provides (Vizina 2008; Unknown 2019). Today, the MN-S seeks to have its Homeland recognized through the Northwest Land Claim.

The northwest region of Saskatchewan is noted as being “home to one of the oldest, most culturally homogeneous Metis [sic] communities in western Canada” (Macdougall 2010). The Métis in Saskatchewan have struggled to secure consistent legal recognition of their identity and rights (Teillet 2019). The implementation of numerous federal and provincial government laws, policies, and practices challenged the ability of Métis ways of knowing, doing, and living (e.g., the ability to hunt, fish, and trap for subsistence and income) (Gulig 1997). Federal and provincial laws and policies in the early 1900s, such as the allotment of scrip and treaty rights, the Fur Conservation Act, Fur Blocks, and fur and fish marketing services, were established to meet the conservation and economic development goals of the Government of Canada and the Government of Saskatchewan. The result was the reorganization of the resource economy and dispersed communities, which had detrimental effects on Métis livelihoods, commercial interests, and subsistence (Raymond 2013). The landlessness experienced by the Métis had far-reaching consequences into the future that continues to shape their ability to self-govern. In addition to landlessness, Métis suffered the effects of residential and day schools, which “suppressed Métis culture” and created “inter-generational trauma” (Métis Nation-Saskatchewan 2023). These schools are one of many historical examples as well as other government laws, policies, and practices that have contributed to adverse cumulative impacts on Métis in Saskatchewan.

In recent decades, landmark legal cases have acknowledged the existence of Métis rights to land and resources. While the *Constitution Act* (1982) does not explicitly define what constitutes Indigenous rights, repeated court cases such as *R. v. Powley* (2003 SCC 43), *R. v. Morin and Daigneault* [1996] 3 CNLR 157, 30 WCB (2d) 531 (1996 SKPC) 5, *R. v. Laviolette* (2005 SKPC 70), or *R. v. Belhumeur* (2007 SKPC 114) have refined what those rights look like. Despite these court cases, Métis continue to face legal processes, policies, legislation, and systems that undermine Métis identity and rights, including:

- *Saskatchewan Environmental Assessment Act* (2009)
- First Nation and Métis Consultation Policy Framework (2023)

- Disposition of Crown Land: The Government of Saskatchewan continues the disposition of Crown Land in Saskatchewan with inadequate consultation protocols that recognize Métis rights and interests in Saskatchewan, in compliance with the *United Nations Declaration on the rights of Indigenous Peoples Act* (Métis Nation Legislative Assembly 2022).
- *Saskatchewan First Act* (2023): The *Saskatchewan First Act* states, "The Act does not restrict or limit existing Aboriginal and treaty rights of Aboriginal peoples of Canada that are recognized and affirmed by Section 35 of the Constitution Act, 1982" (Government of Saskatchewan 2023: 3). However, it is acknowledged that it is not yet known if the implementation of the Act will affect Métis asserted rights (Government of Saskatchewan 2023). Métis asserted rights include the right to self-govern and make decisions about activities that may affect Métis asserted rights, including:
 - exploration for non-renewable resources,
 - the development, conservation, and management of non-renewable natural resources and forestry resources,
 - the operation of sites and facilities for the generation and production of electrical energy.

1.2 Métis Economic Rights

While the early fur trade shaped the nascent Métis economy, the Métis economy itself was pivotal to the success of the fur trade; theirs was a mixed-economy whereby life included both subsistence land-use and diverse commercial trade (Macdougall 2005; Joubert 2008; HBC Heritage 2016). Métis cultural values were essential to economic development. The Métis familial structure of northern Saskatchewan, for example, was rooted in the Cree concept of wahkohtowin.

Wahkohtowin, which placed high value on kinship system and reciprocity ... encompassed all aspects of northern Métis life, including economy (Raymond 2013: ii).

Wahkohtowin was the guiding principle for all decisions, including economic and political. If traders were going to find success in the economy, they "acted according to the dictates of wahkohtowin" (Macdougall 2005). The trading companies were also deeply influenced by wahkohtowin, understanding that an action toward one community member, would result in a ripple effect, good or bad, within the rest of the community.

Métis economic activities originally centred around hunting, trapping, and fur trading. By the mid- to late-19th century, Métis economies began to flourish with emerging commercial trade in agriculture and pemmican production (HBC Heritage 2016). The 20th century saw further shifts in the Métis economy. Urbanization became a significant trend, as Métis individuals and families migrated to cities in search of wage labour opportunities. Many Métis worked in industries such as mining, construction, and transportation, contributing to the growing urban workforce. During this period, efforts to revive and celebrate Métis culture gained momentum. Cultural organizations and events emerged to promote Métis identity, arts, and traditions. These initiatives not only strengthened the cultural fabric of the Métis community but also had economic implications, as cultural tourism and artisanal crafts became sources of income.

1.3 Reconciliation

MN-S, NR1, and NR3 take reconciliation seriously. In considering proposed projects in their Homeland, MN-S, NR1, and NR3 require measurable reconciliation action, demonstrated in practice by proponent leadership and managers' decisions, employment and workforce results, efforts in support of Métis business development, and community relationship building. MN-S expects reconciliation actions to begin with exploration, as activities during exploration are the starting point of building a trusting relationship. In other words, "will the Proponent lead with action rather than just policies?"

1.4 Métis Knowledge and Traditional Use in Northern Region 1 (NR1) and Northern Region 3 (NR3)

Two Worlds Consulting, on behalf of MN-S and NR1 and NR3 (Figure 1), conducted a Métis Knowledge Study (MKS) for the Project. The final Métis Knowledge Study report was shared with Denison on October 24, 2023. Métis Knowledge and traditional use from this study is summarized below, and key figures illustrating the extensive Métis land and resource use in and around the Project are available in **Appendix A**.

Métis in NR1 and NR3 understand a seasonal cycle of land and resource use connected by kinship, family, and identity, which supports psychological, cultural, health, and economic values (Métis Nation Saskatchewan 2021). Through the dependency on seasonal resources, Métis have an intricate understanding of natural cycles, such as when berries ripen or where fish spawn (Two Worlds Consulting 2024a). This knowledge was gained through the intimate observation of the environment in the spaces where Métis harvested exclusively (e.g., grouse, berries, rabbit, fish) and had their traplines (Préfontaine et al. 2003). Following winter activities, the melting of ice begins subsistence lake fishing that lasts until freeze-up in late fall. Throughout the seasons, Métis practice a variety of commercial and subsistence activities, ranging from agriculture (e.g., wild rice harvesting), hunting, and camping trips along intergenerational traplines (Two Worlds Consulting 2024a). Gathering is typically done year-round, punctuated by seasonal availability of preferred berries and roots. Métis dedicate periods to travel to and from different areas by land (skidoo, trucks, quads), and water (canoes, boats) to support land and resource use (Two Worlds Consulting 2024a).



Figure 1. MN-S Regions

The Métis Knowledge Study identified that the Métis Citizens of NR1 and NR3 conduct land and resource use activities at the locations in Table 1 (Two Worlds Consulting 2024a).

Table 1. Locations of Métis harvesting areas

• Alces Lake	• Ena Lake	• Mine / Fox Lake Road
• Beauval	• English River Leaf Rapids	• Cameco's McArthur River Uranium Mine
• Beaver River	• 192P	• Carswell Lake
• Black Lake	• Fort Chipewyan	• Cigar Lake
• Boll Lake	• Fredette Lake	• Melville Lake
• Brazen Lake	• Goldfields	• Milliken Lake
• Bushell, Highway 962, and Uranium City	• Harper Lake	• Mudjatik River
• Button Island	• Highrock Lake	• Patuanak
• Cameco's Key Lake Uranium	• Highway 914	• Paynter Island
• Cluff Lake	• Hill Lake	• Pinehouse
• Collard Lake	• Jean Lake	• Primeau Lake
• Costigan Lake	• Knee Lake	• Russell Lake
• Cree Lake	• Lac Île-à-la-Crosse	• Southend
• Cup Lake	• Lake Athabasca including Camsell Portage and Fond-du-Lac	• Tazin Lake
• Dipper Rapids I.R. 192 C	• Lake Athabasca to Southland, Saskatchewan	• Tippo Lake
• Donaldson Lake	• Lorimer Lake	• Uranium City
• Doré Lake		• Van Nes Lake
		• Wollastan Lake

Land and resource use activities support intergenerational knowledge transfer and the continuation of tradition (Two Worlds Consulting 2024a). Methods, species to harvest, quantities, when to harvest, and food preparation techniques (e.g., drying and smoking) are part of the rich Métis Knowledge shared from generation to generation through oral history and time spent together on the land (Hodgson-Smith and Kermoal 2016). Food preparation methods, such as smoking ptarmigan, are passed down from previous generations (Two Worlds Consulting 2024a). A Métis Knowledge Study Advisor shared that they learned to skin game right away to help keep their hands warm when harvesting in the winter (Two Worlds Consulting 2024a). These teachings continue to influence Métis harvesting practices today, evident in an Métis Knowledge Study Advisor being taught as a child to never harvest a female moose to ensure the future population, which is a practice they have maintained over the years (Two Worlds Consulting 2024a). In NR1 and NR3, Métis Knowledge Study Advisors expressed the continued practice of sharing resources among family members and communities in alignment with whakotowin, the responsibility to family, as well as kiyokewin, the practice of visiting (Raymond 2013; Flaminio et al. 2020).

Métis of NR1 and NR3 use Fox Lake Road, located within the Project area, as an important travel route connecting to trails leading to other harvesting areas in Highrock Lake, Haultain Lake, and Cree Lake (Two Worlds Consulting 2024a). Métis of NR1 and NR3 utilize their cabins to support subsistence, and historically, commercial fishing activities at Cree Lake, Highrock Lake, Russell Lake, and Haultain Lake in the Project area.

An Métis Knowledge Study Advisor shared, "if you don't know your lake, you get lost" (A02) (Two Worlds Consulting 2024a). Métis access the Project area by quad through an exploration line near Highrock Lake and would sometimes camp. An Métis Knowledge Study Advisor described positive experiences fishing in and around the Project area (Two Worlds Consulting 2024a: 50):

I fished Russell and the Wheeler River, which is right here I believe. Right here is the Wheeler River fished all in here. [It was] recreational, yeah. We used to have fish fries on the shorelines there. We brought the welders would make us certain fry times and stuff. Fish. It was nice.

In addition to subsistence activities, Métis conduct commercial activities. Historically, for Métis in NR1 and NR3, commercial fishing activities occurred in both the summer and winter. An Métis Knowledge Study Advisor recalled

their father working for McInnes for thirty-three years and noted they supported cutting ice for storage. Another Métis Knowledge Study Advisor shared about their family's commercial fishing practices near Fox Lake Road (Two Worlds Consulting 2024a: 39):

We hunt moose...Fox Lake Road. Yeah. We did hunting and fishing up there. My grandpa and them used to do a whole bunch of commercial fishing in all these lakes here (A06).

Government regulations and changing economic conditions have impacted the commercial fishing industry in NR1 and NR3. For example, commercial fishing became restricted to the winter months from January to April in the 1990s. Commercial fishing is among the few industries creating economic opportunities in northern Saskatchewan today. Trout, whitefish, and pickerel tend to be the main catches, followed by mullets and cisco. Recently, European demand for roe or caviar from cisco has provided a new direction for commercial fishing in Pinehouse, a predominantly Métis community (Provost 2022 Dec 19).

Historic and current commercial fishing locations identified in the Métis Knowledge Study include: Russell Lake (inactive), Wollaston Lake (inactive), Reindeer Lake and adjacent smaller lakes (active), Stony Rapids/Black Lake (fewer than 10 individuals annually), Tazin Lake (inactive), Cree Lake (limited capacity), La Ronge (active), Buffalo Narrows (active – limited capacity), and La Loche (active – limited capacity) (Two Worlds Consulting 2024a). Métis of NR1 and NR3 are interested in continuing commercial fishing practices.

In the Métis Knowledge Study, Métis Citizens identified the following key potential Project-related interactions on Métis land use, rights and interests (Two Worlds Consulting 2024a):

- Increased sensory disturbances while practicing land and resource use activities.
- Decreased land and resource use practice.
- Increased access restrictions.
- Increased pressure on species and supporting habitats.
- Decreased quality and quantity of species and supporting habitats.
- Increased employment opportunities and employment-related effects to physical and mental health.
- Increased education and training opportunities.
- Decreased connection to family, community, and land and resource use practices.
- Increased stressors on individual, family, and community well-being and self-sufficiency.

2.0 TECHNICAL REVIEW APPROACH

The Consultants, on behalf of MN-S, NR1, and NR3, reviewed the FEIS against the following benchmarks:

- How Denison met the CNSC and the Government of Saskatchewan Ministry of Environment environmental assessment (EA) requirements.
- How Denison met its Terms of Reference (TOR) for the Project.
- How Denison applied engagement contributions from MN-S, NR1, and NR3.
- How Denison applied the Métis Knowledge Study.
- How Denison met EA and engagement best practices.

The FEIS states, "areas of identified interest, issues, or concerns are not always related to environmental effects as defined by CEAA 2012 (the regime under which the Project is undergoing regulatory assessment)" (Denison Mines Corp. 2022: 67). Though the Project EA process is subject to CEAA 2012, consultation and engagement practices have evolved, as acknowledged by the CNSC guidance and regulations (Section 3.1). The MN-S, NR1, and NR3 expected Denison to apply CNSC EA and engagement guidance and requirements, which include opportunities for Indigenous Nations to:

- Inform the selection of Valued Components (VC).
- Inform the Project design.
- Inform the EIS, including effects evaluations “to the environment on Indigenous peoples (health and socio-economic conditions; physical and cultural heritage, including any structure, site or thing that is of historical, archaeological, paleontological or architectural significance; and current use of lands and resources for traditional purposes), pursuant to paragraph 5(1)(c) of the CEAA 2012” (Canadian Nuclear Safety Commission 2021: 20) and mitigation.

The MN-S facilitated engagement sessions with NR1 and NR3 Citizens to share the Consultants’ technical review findings and inform the development of this report. The concerns shared at these sessions are captured in blue call-out boxes.

2.1.1 Baseline Data and Effects Evaluations Benchmarks and Context

The MN-S, NR1, and NR3 understand that the CNSC has a mandate to protect the environment and the health, safety and security of persons in accordance with legislation under the *Nuclear Safety and Control Act* (NSCA). The *Environmental Principles, Assessments and Protection Measures* (REGDOC-2.9.1) regulation outlines the CNSC’s principles for environmental protection, EA scope and roles and responsibilities, and the development of environmental protection measures. This process requires characterization of the baseline environment, identifying environmental effects, and identifying environmental protection measures for VCs, including Aboriginal land and resource use.

The consideration of the FEIS baseline data and effects evaluation content in this evaluation bore in mind the TOR requirement, “the EIS will provide rationale for selecting VCs and will describe VCs in sufficient detail to allow reviewers to understand their importance and assess potential effects from Project activities.” For the technical review, “sufficient detail” in EAs is data and information collected with enough depth and accuracy to support analysis, decision-making, or future comparisons. In addition, the data and information needed to be presented in a distinctions-based format. That is, Métis-distinct data, information, and issues needed to be segregated. Without a clear picture of the Métis Citizens and communities, it would not be possible to distinguish the proposed Project effects on Métis from effects on other Indigenous Nations.

Where necessary, issue specific benchmarks are also included in the technical review.

2.1.2 Monitoring and Management Plans Benchmarks and Context

Monitoring and management plans are essential to confirm Project interactions and mitigation effectiveness, particularly because of the clear Métis interest in Project interactions detailed in the Métis Knowledge Study. Best practice monitoring and management plans would include the involvement of Indigenous Nations, in this case MN-S, NR1 and NR3, in all aspects of the planning and design. For example, the CNSC [Draft Integrated Tailored Impact Statement Guidelines](#) for the Peace River Nuclear Power Project refers to the need to “describe opportunities for the involvement of Indigenous Nations and communities, local communities, stakeholders, local and regional Indigenous organizations in the follow-up program design and implementation, as well as communication mechanisms between these parties and the proponent”.

2.1.3 Cumulative Effects Benchmarks and Context

Within EA as practiced in Canada, the purpose of cumulative effects assessment is the process of identifying, analysing, and evaluating the collective effects of a proposed Project in combination with other past, present, and reasonably foreseeable future actions.

The communities of NR1 and NR3 have already undergone considerable cumulative changes that have adversely affected, and continue to affect, Métis ability to maintain traditional livelihoods and activities (subsistence and commercial) and directly affect their perception of their Homeland (Two Worlds Consulting 2024a). Cumulative changes can be caused by physical changes, or fears such as contamination, resulting in some areas of the Homeland being avoided and other areas being overused (Two Worlds Consulting 2024a). Over time, the Métis Homeland has been shrinking despite the Métis Nation's ongoing pursuit of the Métis Northwest Land Claim. The proposed Project sits in the midst of other uranium mines and is immediately south of the proposed expansion at McClean Lake mine, in which Denison also has an interest. The technical review will pay particular attention to present and reasonably foreseeable future projects and developments. Past projects and developments have already caused cumulative psychological, social, economic, cultural, and environmental changes to the Métis Nation (Two Worlds Consulting 2024a). These changes include:

- past and ongoing resource development and exploration activities, especially the legacy effects of the Key Lake Mine and access restrictions around existing and new exploration and mine sites,
- past and ongoing government regulations and policies that have restricted or changed harvesting,
- past and ongoing industrial and urban development,
- wildfires, other extreme weather events, and climate change,
- fluctuating economic conditions, and
- competition from non-Indigenous settlers.

These past actions are already reflected in the current baseline, where significant negative impacts (e.g., woodland caribou) have already been flagged, for which project proponents will need to take special actions.

Figure 2 illustrates the mineral development and extraction activity in NR1 and NR3 that are contributing to cumulative effects on Métis rights.

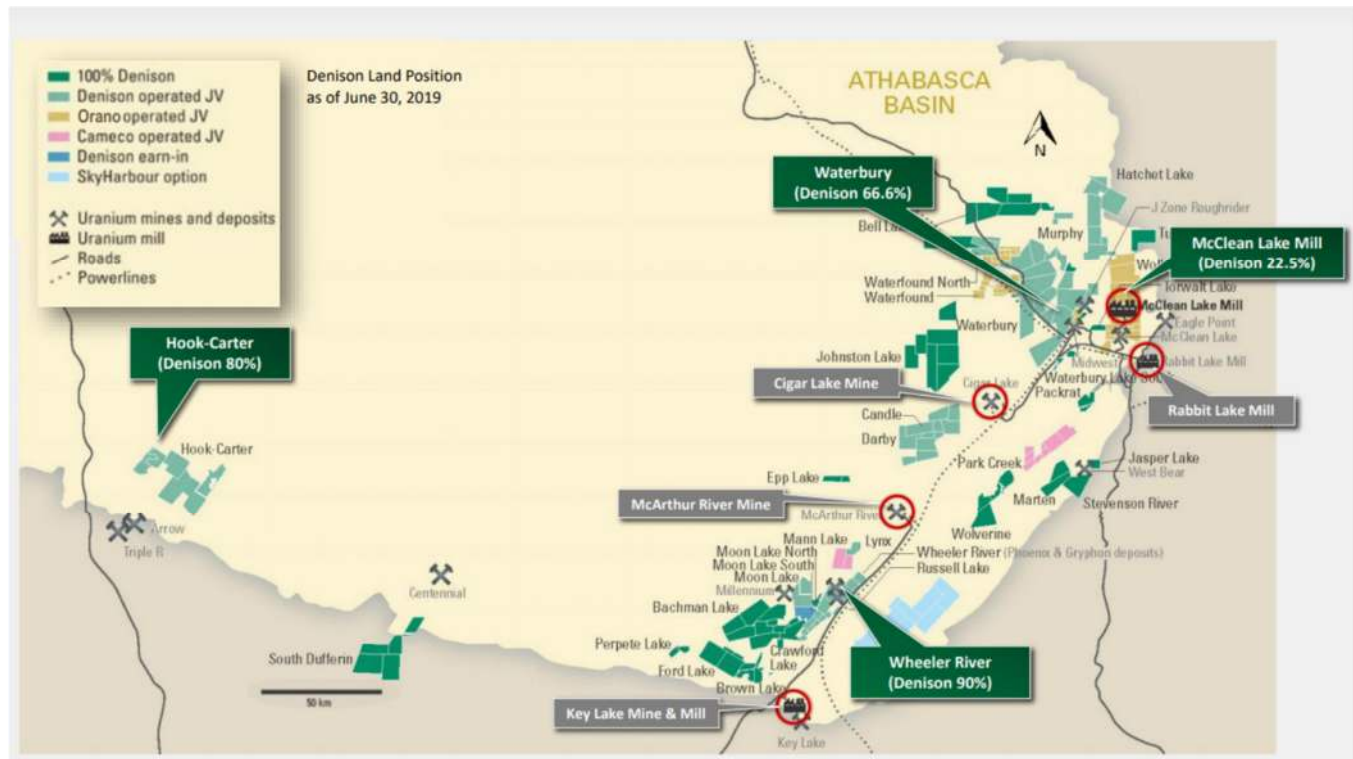


Figure 2: Activities and Projects Contributing to Cumulative Effects in NR1 and NR3

Figure Source: Denison Mines ND ([McClean Lake Project](#) | [Denison Mines Corp.](#))

3.0 OUTSTANDING PROJECT IMPACTS

Section 3.1 – Section 3.7 describe the key outstanding Project impacts to MN-S and NR1 and NR3 based on the technical review of the FEIS.

3.1 Impact#1 – Archaeology

Under Saskatchewan's *Heritage Property Act* (1979-80), archaeological assessments are triggered through the Heritage Conservation Branch's screening process. If a project area is deemed heritage-sensitive, a Heritage Resource Impact Assessment (HRIA) is required. These assessments must consider both archaeological potential and Indigenous heritage values and land use.

3.1.1 Baseline Data and Effects Evaluation

The Project was submitted to the Saskatchewan Ministry of Parks, Culture and Sport - Heritage Conservation Branch for heritage screening, and it was determined that the proposed infrastructure and access road options will impact lands located within heritage-sensitive areas (Heritage Conservation Branch File No. 16-2102). Accordingly, a HRIA requirement was attached to the Project, pursuant to Section 63 of the *Heritage Property Act*, and "Heritage Resources" was included as a sub-component of the Land and Resource Use VC of the EIS prepared for the Project.

As the Project is federally regulated and subject to the *Canadian Environmental Assessment Act*, 2012 (CEAA 2015), Heritage resources are defined in the EIS using both provincial and federal definitions (Wheeler River Project Final EIS – 2024, Section 11.3.1, Page 11-166): *"physical and cultural heritage or any structure, site, or thing that is of historical, archaeological, paleontological, or architectural significance is referred to as heritage resources. Lands or resources are considered a heritage resource based on the values that are placed on it (CEAA 2015). This value originates from its association with one or more important aspects of human history or culture; historical, archaeological, paleontological or architectural significance; and association with a particular groups' practices, traditions or customs. In Saskatchewan, heritage resources are the property of the Provincial Crown and are protected under the Heritage Property Act (Government of Saskatchewan 2019). Heritage resources include Precontact period and Historic period archaeological sites, built heritage sites and structures of historical and/or architectural interest, and paleontological sites."*

The Government of Saskatchewan's *First Nation and Métis Consultation Policy Framework* (2023) requires meaningful engagement with Métis when developments may affect their constitutionally protected rights, interests, and traditional practices. In the context of the Project, this includes identifying culturally significant areas, integrating Métis Knowledge Study findings, and ensuring that mitigation measures address potential impacts on Métis heritage and land use.

Key benchmarks for the archaeological and heritage technical review included:

- HRIA compliance under provincial legislation.
- Identification of gaps in Indigenous consultation, particularly with MN-S.
- Incorporation and consideration of Métis Knowledge Study findings.
- Mitigation strategies that are inclusive, flexible and responsive to future input from MN-S.

The Baseline Heritage Resources studies (Appendices 11-C and -D) were completed by Golder in 2017 and 2019 and the Heritage Resources Management Plan (HRMP) (Appendix 11-B) was completed in 2022, all of which predate Denison's receipt of the Métis Knowledge Study in October 2023. While the archaeological methods and procedures used in the Project's baseline studies are technically sound, there are notable areas for improvement

in how the results of the Métis Knowledge Study have been considered and incorporated in the FEIS, as well as in the Project's commitments to the ongoing and future inclusion of the MN-S in heritage resources work.

Métis Knowledge and engagement contributions from MN-S, NR1 and NR3 specific to Heritage Resources have been included in the following sections of the FEIS:

- Section 11.1.3.1 Historic Settlement and Land Use of the Dene and Métis Communities in the Project Region, Subsection 11.1.3.1.2 Métis Settlement and Land Use.
- Section 11.1.3.2 Contemporary Indigenous Land and Resource Use in the Region, Subsection 11.1.3.2.3 Métis Nation–Saskatchewan.

Métis Knowledge and engagement contributions from MN-S, NR1 and NR3 specific to Heritage Resources is under-emphasized in the FEIS as follows:

- Section 11.3.2 (Influence of Indigenous Knowledge, Local Knowledge, and Engagement) does not include or consider the Métis Knowledge Study and related maps under the Heritage Resources subcomponent of the Land and Resource Use VC, despite Métis Knowledge Study information being cited and considered in Sections 11.1.3.1 and 11.1.3.2.
- Appendix 11-B, Section 4.1 (Culture History), Subsection 4.1.4 (The Contact Period: The Fur Trade) fails to reference the MN–S or Métis peoples, despite their well-documented historical presence and heritage values in the region during the Contact Period. Sections 2.0 to 2.6 of the Métis Knowledge Study outlines this history in detail, including the emergence of Métis communities in the early 1600s, the critical role played by Métis during fur trade-era and the associated emergence of Métis heritage resources (i.e., material culture and sites), including overwintering camps (also known as hibernant sites) and distinct mobility patterns within the Métis Homeland.
- Appendix 11-B, Section 5.1 (Chance Finds Procedures) does not specify which Indigenous communities Denison has committed to engage in the event of any incidental or chance find, including archaeological or palaeontological sites, or human remains.
- Appendix 11-C, Section 2.2 (Local Environment) does not acknowledge that MN–S or Métis communities maintain historic and ongoing ties to the Project Area and surrounding region.
- Appendix 11-D, Section 1 (Introduction), Section 2 (Project Location and Environment), and Section 3 (Engagement) do not include or consider the MN-S or the information provided in the Métis Knowledge Study Project, and do not acknowledge the Project's overlap with the Métis Homeland.

Despite the Métis Nation's deep-rooted presence and cultural influence across the western interior, including Northern Saskatchewan, their material and spatial histories have often been overlooked or misclassified within colonial archaeological frameworks. This erasure not only distorts the historical record but also undermines MN-S's rights to cultural heritage and land-based knowledge. Addressing these gaps requires a meaningful shift toward Métis-led archaeological research, where Métis scholars, knowledge holders, and communities guide the identification, interpretation, and stewardship of their own cultural landscapes within the Métis Homeland. Such an approach ensures that Métis perspectives are central to understanding the Contact Period and supports the broader goals of reconciliation, cultural revitalization, and legal recognition of Métis geographies in Saskatchewan.

For example, recent community-based research projects have focused on distinguishing Métis mobility patterns from those of settlers or First Nations. These studies emphasize the importance of geographic and kinship-based movement during the fur trade as a defining feature of the Métis Homeland (e.g., Supernant 2012, 2014, 2018).

Recommendation #1: Denison should engage with and involve MN-S prior to further planned archaeological fieldwork for Heritage Resources and to incorporate Métis Knowledge and engagement contributions into the archaeological analysis.

Recommendation #2: Denison should engage with MN-S to determine MN-S cultural protocols for Heritage Resources, including for chance find procedures, and commit to following these protocols in the context of the HRMP.

Recommendation #3: Denison should provide funding to MN-S to support ongoing archaeological research and development of its digital historic archives.

3.1.2 Monitoring and Management Plans

In Appendix 11-B, Section 5.1 (Chance Finds Procedures) of the FEIS does not contain a formal commitment for Denison to engage MN-S and NR1 and NR3 prior to future archaeological and heritage resources fieldwork, including processes to engage in the event of any incidental or chance find. MN-S and NR1 and NR3 expect Denison to involve MN-S and NR1 and NR3 in the design and implementation of archaeological and heritage resources fieldwork, including following Métis protocols if Heritage Resources are discovered. MN-S and NR1 and NR3 have not yet had an opportunity to conduct their own land-based archaeological and heritage fieldwork in and around the Project area.

See Recommendations in Section 3.1.1.

3.1.3 Cumulative Effects

As described in Section 1 (Site History) of the FEIS, the Wheeler River property was staked on July 6, 1977, and ground-disturbing activities—including exploration, prospecting, diamond drilling, road construction, and land clearing—have occurred on the property from 1978 to the present (excluding 1990 to 1994). These activities had the potential to impact archaeological and heritage resources. According to the methodology outlined in Section 5.9 of the FEIS, the cumulative effects assessment (CEA) evaluates whether residual adverse effects of the Project on a VC overlap spatially and/or temporally with similar effects from other past, present, or reasonably foreseeable projects or activities. However, the CEA for Heritage Resources (Section 11.3.7) concludes that there is low potential for cumulative effects, based on the assumption that future projects will not share the same footprint. This conclusion does not incorporate the full extent of past disturbances within the Project Footprint—particularly those that occurred without archaeological fieldwork, documentation, or engagement with MN-S.

See recommendations in Section 3.1.1.

3.2 Impact #2: Engagement

The MN-S, NR1, and NR3 note the Project is located within the Métis Homeland and subject to the 1994 Title Claim. As such, Denison prepared an Indigenous Engagement Report to summarize its engagement with MN-S, NR1, and NR3 up to submission of the FEIS.

The MN-S, NR1, and NR3 understand that the CNSC has established consultation and engagement practices to meet Duty to Consult requirements (Canadian Nuclear Safety Commission 2025). These practices are intended to support collaboration and reconciliation with Indigenous Nations (Canadian Nuclear Safety Commission 2025). For example, project proponents should find opportunities to “listen, learn about issues, seek solutions, and identify collaborative ways of bringing those issues before the Commission”. The MN-S, NR1, and NR3 also understand that the CNSC is responsible for assessing Indigenous engagement implementation for licensees such as Denison, ensuring that licensees meet the requirements outlined in the following CNSC regulatory documents: REGDOC-

3.2.2, *Indigenous Engagement* and REGDOC-3.2.1, *Public Information and Disclosure*. These documents set the engagement benchmarks that MN-S, NR1, and NR3 expected Denison to follow in addition to the other benchmarks identified in Section 2.0.

Impact #2: NR1 and NR3 Citizens' Key Concerns:

Métis Citizens of NR1 and NR3 expect Denison to have respectful conversations with their communities to understand their concerns. Métis have been living with earlier uranium projects where they feel that their concerns have not been heard. Métis Citizens expressed interest in receiving more information on the Project and an opportunity to visit the Project site to better understand how their rights could be potentially impacted by the Project and to discuss their mitigation interests. Notably, a Métis Elder shared that consultation is not a box-checking exercise and requires Denison to co-design the engagement process with Métis. Métis Citizens shared that some Citizens have lost trust in proponents, affecting their interest in participating in engagement sessions led by proponents. Métis Citizens want to know their voices are being considered by mining companies, including Denison, and expect to see efforts made to rebuild trust with Métis communities.

3.2.1 Baseline Data and Effects Evaluation

The Indigenous Engagement Report in the FEIS incorrectly suggests engagement efforts between Denison and MN-S, NR1, and NR3 were delayed by MN-S, NR1, and NR3 and focused on "commercial concerns". Denison was expected to and repeatedly indicated that it would negotiate an Impact Benefit Agreement with MN-S, NR1, and NR3 per written communications on November 15 and November 27, 2019. This agreement is foundational to support consent-seeking processes, discussions, and decision-making of the MN-S, NR1, and NR3 in alignment with best practices such as the Truth and Reconciliation Committee Call to Action #92.

Moreover, Denison provided capacity funding to MN-S, NR1, and NR3 to conduct a technical review of the DEIS and to develop a Métis Knowledge Study to inform the FEIS, Project decision-making, and ongoing consultation and engagement with Métis. MN-S, NR1, and NR3 submitted comments on the draft EIS (DEIS) on March 3, 2023, and provided a Métis Knowledge Study on October 23, 2023. Both submissions outlined several Project-related concerns, issues, and interests for MN-S, NR1, and NR3, most unrelated to "commercial concerns".

Denison responded to the DEIS comments provided by MN-S, NR1, and NR3 seven (7) months later on December 1, 2023 (**Appendix B**). The FEIS states that Denison and MN-S "met regularly to discuss the advancement of the Métis Knowledge Study and to discuss items in relation to the development of a MN-S defined process for engagement on the Project, including in relation to the resolution of the MN-S public comments and general issues and concerns" (i.e., the comments on the DEIS) (Denison Mines Corp. 2022: 66). The engagement record in the Indigenous Engagement Report shows that Denison met with MN-S five (5) times (June 12, 2023; June 26, 2023; July 27, 2023; August 31, 2023; and February 1, 2024) between March 2023 and July 31, 2024 when Denison filed the FEIS with the Government of Saskatchewan Ministry of Environment and November 25, 2024 when Denison filed the FEIS with the CNSC (Appendix A-9). The meeting purposes were marked as "Engagement". There is no record that Denison and MN-S had meetings for the purpose of "Identification of VCs, Project Description, Baseline/Existing Conditions, Assessment and Mitigation, Monitoring and Follow-up", which represents other tracking criteria used by Denison in the Indigenous Engagement Report. This confirms MN-S experience that there were, historically, insufficient engagement efforts to address potential adverse Project effects to Métis or meaningfully involve Métis in VC selection, baseline studies, effects evaluations, and mitigation development. The language in the Indigenous Engagement Report incorrectly suggests MN-S only engaged in process rather than collaboration on potential Project effects to Métis rights and interests.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should engage MN-S, NR1, and NR3 to mitigate adverse impacts to Métis.

Recommendation #2: Denison should apply a distinctions-based approach going forward.

Recommendation #3: Denison- should provide capacity funding to MN-S, NR1, and NR3 and continue engagement to resolve outstanding issues and concerns.

3.2.2 Monitoring and Management Plans

The FEIS states, "MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions" (Denison Mines Corp. 2022: 301).

This technical evaluation confirmed that MN-S monitoring and management plan expectations have not yet been met. MN-S, NR1, and NR3 clearly stated the importance of Métis-led monitoring and management programs in the Métis Knowledge Study, which was reiterated in comments on the DEIS.

Recommendation #1: Denison should meaningfully involve Métis in the design, implementation, and reporting of monitoring programs, and not just "inform". Métis require decision-making opportunities to ensure monitoring programs mitigate potential adverse effects (e.g., downstream effects to water quality) and enhance potential positive effects to Métis (e.g., employment and training opportunities).

3.3 Impact #3 – Fish and Fish Habitat

The MN-S, NR1, and NR3 understand that in addition to environmental requirements set out in CEAA 2012 for the assessment of project environmental affects to the Aquatic Environment, the assessment process must also meet the requirements outlined in the *Fisheries Act*, the *Species at Risk Act*, and their associated regulatory and policy frameworks to assess potential effects specific to fish and fish habitat. As part of the assessment process, project proponents must consider the use of Indigenous knowledge to:

- identify traditional fishing locations and practices;
- identify long-term effects on fish populations and aquatic ecosystem integrity; and
- develop monitoring and mitigation plans including adaptive management strategies based on monitoring results.

In the context of the Project, this includes identifying culturally significant Métis fishing sites, integrating Métis Knowledge Study findings, and ensuring that monitoring plans and mitigation measures address potential impacts on Métis fishing and other land use activities.

The fish and fish habitat technical review included:

- Identifying gaps in baseline studies to ensure potential project impacts on Métis fishing sites are fully understood and appropriately assessed;
- Confirming that feedback from MN-S, NR1, and NR3 on the DEIS was thoroughly addressed and integrated into the FEIS.

Impact #3: NR1 and NR3 Citizens' Key Concerns:

Métis Citizens shared that fish in the Métis Homeland are already suffering and want to see lakes left alone. Métis Citizens expressed the importance of a Métis-led and operated monitoring position for the Project. This role would support providing monitoring results to communities and gathering feedback from communities to

support ongoing monitoring. Citizens shared that Métis involvement in Project monitoring will support Denison in building trust at the community level and combat the negative stigma that exists about uranium mines.

3.3.1 Baseline and Effects Evaluation

The Baseline Aquatic Environment Study completed by EcoMetrix in March 2020 predates Denison's receipt of the Métis Knowledge Study in October 2023. While the methods used in the EcoMetrix Study are technically sound, EcoMetrix does not include many waterbodies identified in the Métis Knowledge Study as culturally significant for Métis communities. Many of these waterbodies were also not incorporated into the FEIS. The absence of baseline data for these culturally important waterbodies limits the ability to fully assess potential project-related impacts.

Important fishing areas identified by MN-S, NR1 and NR3 in and around the project that were not incorporated into baseline studies or the FEIS:

- Wollastan Lake
- An ice fishing site that overlaps with the Wheeler River project site
- Key Lake
- Waterbodies along Highway 914 – along km 190 of Highway 914 south of Key Lake Uranium Mine and Km 160 of Highway 914 between English River Haultain Lake IR
- Highrock Lake – fishing sites accessed by ATV from Métis cabins at Km 160 on Highway 914
- Haultain Lake
- Cigar Lake
- Close Lake (located within the Local Study Area (LSA))
- Russell Lake (baseline data for Russell Lake is included in the Aquatic Environmental Baseline Study (EcoMetrix Incorporated 2020)) however Russell Lake is not included in the aquatic monitoring program in the FEIS)

Many of these waterbodies are not included in the Regional Study Area (RSA) which prevents a comprehensive assessment of potential Project effects on fish and fish habitat. The boundaries of the local and regional study areas must reflect, among other factors, the potential effects on traditional land use, current cultural land and resource use by communities, the scale and proximity of past, present, and reasonably foreseeable projects, and relevant Indigenous knowledge, ecological insights, and technical considerations. Lakes within the Project area are hydrologically connected by surface flow, with drainage generally moving southward into Russell Lake, then through the Wheeler and Geikie Rivers before ultimately discharging into Wollastan Lake (EcoMetrix Incorporated 2020)). Several waterbodies along Highway 914 are actively used by Métis for fishing, while others—located further afield—are accessed via this corridor. The presence of multiple mining operations along Highway 914, including Cameco's Key Lake Operation, McArthur River Operation, and Cigar Lake Mine, increases the potential for cumulative effects on fish and fish habitat. The interconnected nature of waterbodies in the region, combined with the potential for cumulative effects from nearby mining operations, highlights the importance of expanding baseline studies to include waterbodies along Highway 914 as well as the other waterbodies identified as culturally important to Métis to ensure a thorough and comprehensive assessment of potential impacts. Furthermore, as Russell Lake is listed as one of the important subsistence fishing locations for Métis in the Project area, and Russell Lake is included in the Aquatic Environmental Baseline Study (EcoMetrix Incorporated 2020), it is expected that it be included in the aquatic monitoring program as requested by MN-S during review of the DEIS.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should conduct additional fish and fish habitat field studies in waterbodies deemed culturally significant to Métis so that potential Project effects on Métis fishing practices can be appropriately evaluated and managed prior to the completion of the monitoring plans.

Recommendation #2: Denison should include and consider information presented in the Métis Knowledge Study and incorporate Métis involvement and apply any additional Métis knowledge when developing mitigation and monitoring plans. Specifically, Denison should use a conservative approach and include all waterbodies listed in the Métis Knowledge Study as potential fishing waterbodies for current and future use by MN-S and NR1 and NR3.

Recommendation #3: Denison should include Russell Lake in the aquatic monitoring program. Russell Lake is listed as one of the important subsistence fishing locations for Métis in the Project area and is included in the Aquatic Environmental Baseline Study (EcoMetrix Incorporated 2020). Cumulative effects from the Cameco Key Lake operation will also be detected in this waterbody.

3.3.2 Monitoring and Management Plans

In their review of the DEIS, MN-S highlighted several matters related to monitoring and management plans:

1. MN-S requested that Métis Knowledge be meaningfully integrated into the development of discipline-specific effects assessments, the Final EIS, and all environmental monitoring and management plans—including those related to fish and fish habitat.
2. MN-S requested that Russell Lake be included in the aquatic monitoring program (see above).
3. Denison has indicated that treated effluent will be discharged into Whitefish Lake South and identified Whitefish Lake North as a reference location to monitor fish health. Denison confirmed that there is no physical barrier between the two lakes, allowing fish to move freely between them. MN-S feels that Whitefish Lake North cannot serve as a reliable reference site for assessing effluent-related impacts and recommends that Denison select an alternative lake for fish health monitoring to ensure accurate impact assessment.

Additionally, MN-S asked for:

1. Access to project management documents relevant to potential impacts on traditional land use activities (e.g., Preliminary Decommissioning Plan, Status of the Environment reports, Environmental Effects Monitoring reports, Annual reports, updated environmental risk assessments, and the Final Decommissioning Plan); and
2. Engagement with MN-S, and NR1 and NR3 to determine preferred methods for receiving and reviewing monitoring results.

In the FEIS, Denison includes a general statement in Section 8.2.9 (Surface Water Quality Summary) indicating that “specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program.” Additionally, in Appendix C-9: MNS Key Interests, Issues and Concerns in the Indigenous Engagement Report, Denison states that “MN-S will be informed throughout the monitoring program design and implementation process,” and that the program will be guided by principles such as meeting regulatory requirements, confirming the effectiveness of mitigation measures, implementing adaptive management, and ensuring that spatial boundaries are sufficient to measure EIS predictions.” (Denison Mines Corp. 2022: 292).

These statements remain high-level in terms of clearly outlining how Métis will be actively involved in co-development and decision-making in monitoring and management planning.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should move beyond simply “informing” MN-S, NR1, and NR3 during monitoring program design and implementation and actively seek early and ongoing input and involvement from MN-S, NR1, and NR3 in the development and implementation of discipline-specific monitoring and management plans.

Recommendation #2: Denison should co-develop monitoring and mitigation strategies with MN-S, NR1, and NR3 that are inclusive, incorporate adaptive management, and are responsive to continuing input from MN-S.

Recommendation #3: Denison should select and analyse a reference lake for fish health monitoring that is hydrologically isolated from the effluent discharge site to ensure accurate assessment of effluent-related impacts to fish health in Whitefish Lake South.

Also see Recommendation #2 and #3 under 3.3.1 Baseline and Effects Evaluation.

3.3.3 Cumulative Effects

Many of the identified gaps related to cumulative effects have already been addressed through recommendations outlined in the preceding sections. To summarize, given the potential for cumulative effects from existing uranium mining operations along Highway 914—including Cameco’s Key Lake, McArthur River, and Cigar Lake sites—Denison should conduct additional field studies in waterbodies identified as culturally significant to Métis communities, incorporate Métis Knowledge Study findings into mitigation and monitoring plans, and apply a precautionary approach by including all waterbodies listed in the Métis Knowledge Study as potential fishing sites (EcoMetrix Incorporated 2020).

3.4 Impact #4 – Economics

Economics has long been a VC of Métis concern (Two Worlds Consulting 2024a). Particularly, Métis are interested in how the proposed Project will affect employment, education and training, and their traditional economy. The Métis Knowledge Study flagged employment, income, and training opportunities, including transferable skills to non-uranium industries, working hours and rotation, and travel to the Project site (Two Worlds Consulting 2024a). The economic evaluation focused on five key indicators:

- Employment and Training
- Income
- Traditional Economy
- Business Opportunities
- Government Revenues

This evaluation emphasized data adequacy, data disaggregation, and interpretation. The economic evaluation also considered the current standard practice as defined in the *Tailored Impact Statement Guidelines Template*¹, even though this Project is under CEAA 2012.

See **Appendix C** for a detailed technical review completed by Impact Economics.

¹ Government of Canada. 2025. Tailored Impact Statement Guidelines Template. (revised August 2025). Impact Assessment Agency of Canada. <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/tailored-impact-statement-guidelines-projects-impact-assessment-act.html#toc24>

Impact #4: NR1 and NR3 Citizens' Key Concerns:

Métis Citizens shared that proponents often leave nothing for communities when their projects conclude. Métis Citizens expect Denison to meaningfully support Métis access to Project employment opportunities. These opportunities must move beyond entry-level and support career progression during the life of the Project and beyond (e.g., post-Project succession planning, such as providing access to training opportunities). Métis Citizens want to see Denison work with Métis businesses to help inject benefits into local and regional economies. At other projects, Métis or other Indigenous Peoples were hired to meet specific quotas and then let go. Métis want to ensure employment opportunities are long-term. Métis Citizens expect Denison to report on employment metrics to ensure the Project benefits are being maximized for northern communities. Métis Citizens emphasized the importance of building transferable skills and having something to show for the skills developed through Project employment, such as certificates or other formats, which will help with external recognition of the practical experience gained through Project employment. Without formal documentation of skills and training obtained, Métis Citizens may lose out on future employment opportunities to people who have more formal education, despite having fewer years of experience and less practical experience. Métis Citizens said Denison should partner with regional colleges such as Saskatchewan Polytechnic, the University of Saskatchewan, the University of Regina, and the Government of Saskatchewan Ministry of Education to support Métis employment today and in the future. Métis Citizens shared that smaller businesses may lower the value of their work to remain competitive with larger businesses from southern Saskatchewan or out-of-province that can be more cost-competitive.

3.4.1 Baseline and Effects Evaluation

While the economic data, as presented in Section 13 of the FEIS (e.g., 2017 Statistics Canada, Government Revenues), is adequate, it falls short of demonstrating what economic life is like in the LSA communities and does not lend itself to detailed analysis when attempting to compare the predicted economic effects of the Project. The data and evaluation do not disaggregate Métis from other populations in the area. Further, general statements about the historical performance of uranium operations do not translate to the outcome of the current situation and benefits for people in the LSA. Denison has only supported its performance expectations with general statements regarding regional and provincial education and training programs.

For instance, Denison states that it "... has identified areas where there are likely synergies with labour demand and availability within the LSA" (Denison Mines Corp. 2024: 16–33), but does not describe what these synergies are, if they apply generally across the entire region or to specific groups within the LSA, or what they might represent in terms of the number or percentage of LSA labour and business participation. It is unclear what opportunities might be. The FEIS does not offer any clear evidence of what Denison is expecting as the economic benefits for Métis in NR1 or NR3.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should expand its examination of current conditions to be more comprehensive and make a greater effort to disaggregate economic data between the populations of interest, which would include separating, where possible, the conditions of First Nations and Métis populations living within the same geographic setting.

Recommendation #2: Denison should conduct a more robust form of economic and financial analysis. The analysis, as presented, is too high-level to offer sufficient information to fully inform LSA and RSA residents and businesses on the potential effects they might experience, and does not present enough information to stimulate action or investment that might otherwise enhance benefits or reduce adverse effects.

3.4.2 Monitoring and Management Plans

Section 13 repeatedly refers to past outcomes of uranium mines, such as 45% goods and services purchases from northern Saskatchewan businesses and joint ventures (Denison Mines Corp. 2024: 13–70), without making a specific commitment regarding purchases. The proponent should take a more robust position in identifying precisely when, where, and how it will work with communities to improve their ability to participate in the Project and build this work into a management plan prior to the start of operations. Most specifically, the data needs to be disaggregated for Métis.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should provide more details to demonstrate and commit to the pathway between Project demand and the affected region's supply of labour and capital in a management plan and monitor the outcomes.

3.4.3 Cumulative Effects

Economics is the study of cumulative effects. Denison attempted to use the examples of earlier mines to justify the potential success of the Project. Despite 30+ years of uranium mining in the region, the key economic indicators for the LSA are below the average in Saskatchewan, in most instances, with high rates of unemployment and low employment rates. The FEIS does not address this inconsistency.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should conduct a greater analysis of cumulative effects, in particular, how the past 30+ years of uranium mining in the area have affected residents in the LSA. This study will inform actions Denison can take to address areas that may require attention despite decades of industrial activity.

3.5 Impact #5 – Water Quality

Métis value protecting water resources in their Homeland from contamination (Two Worlds Consulting 2024a). This technical review focused on data deficiencies related to water quality baseline information, effects assessment, and related mitigations presented in the FEIS. The focus was on the interaction between the mining solution and the groundwater system, with an emphasis on decommissioning and post-decommissioning phases, when the area will be released again to the province through the Institutional Control Program.

Impact #5: NR1 and NR3 Citizens' Key Concerns:

Métis Citizens want to know the outcome of Denison's initial In-situ Recovery testing at the Project site. Métis Citizens are extremely concerned about potential Project impacts to groundwater. They shared that water is life and impacts to groundwater may not be realized for many decades and could have far-reaching impacts outside of the Project area. Métis Citizens want to know what measures are being used by Denison to prevent catastrophic leaching of radioactive or other harmful chemicals into groundwater. Notably, Métis Citizens shared concern for leaching during mining activities below the ground because uranium will heat up when being extracted, which could affect the integrity of the freeze walls intended to support containment of harmful chemicals at the Project site. Métis Citizens expressed concern for the viability of ISR mining methods in northern climates with permafrost and potential adverse Project impacts to groundwater if permafrost is affected by climate change. Métis want to know the protocol if/when leaching is detected. Métis Citizens expect Project monitoring for water quality to be conducted in areas far from the Project.

3.5.1 Baseline and Effects Evaluation and Monitoring and Management Plans

The proposed approach to decommissioning the mining area is to maintain containment with the freeze wall while flushing the mining area to remove the acidic mining solution, thereby reducing the risk of poor-quality water spreading into the groundwater and ultimately affecting Whitefish Lake. The underlying assumption was that the underground is homogeneous when in reality it will be more heterogeneous because of geology, mineralogy and porosity between drillholes. No other decommissioning approaches were presented.

Overall, the modelling approach and data used were appropriate for this stage of development design. The groundwater travel speeds modelled that any impacts to Whitefish Lake will only be detected in several hundred years. Based on the modelling presented at this stage, monitoring and adaptive management plans are critical elements for managing the mine's environmental performance. This is acknowledged in the FEIS.

See **Appendix D** for a detailed technical review completed by GEM Services.

Recommendations to address these matters are as follows:

Recommendation #1: Denison will need to do additional site characterization of the geology and hydrogeological conditions and develop an updated groundwater and chemistry model for the site. Denison should submit the model and future water quality-related plans with MN-S, NR1, and NR3 for review and comment.

Recommendation #2: Denison must update the conceptual decommissioning plan to a draft plan once detailed engineering and updated groundwater modelling are complete. MN-S, NR1, and NR3 should be involved in the development of the draft plan.

Recommendation #3: Denison should outline measurable criteria for triggers in the adaptive management process within the detailed groundwater monitoring plan (once detailed engineering and updated groundwater modelling are complete).

Recommendation #4: Denison should include the MN-S, NR1, and NR3 as one of the parties in addition government ministries and regulators with whom it consults when developing water quality-related mitigation strategies as part of the adaptive management process.

3.6 Impact #6 – Woodland Caribou

Woodland caribou are a valued species to the Métis Nation. Caribou are critical to Métis cultural harvesting practices. Caribou are key to Métis "Quality of Life".

The Project is in the SK1 Boreal Shield conservation unit for the boreal population of Woodland Caribou (*Rangifer tarandus ssp. caribou*). The SK1 range is uniquely characterized by high levels of natural disturbance (primarily wildfire) and low levels of anthropogenic activity^{2,3}. Anthropogenic disturbance appears to have a stronger negative effect on population condition and should be maintained at or below 5% while maintaining a minimum of 40% undisturbed habitat.

The SK1 range planning process began in December 2023. Once finalized, the range plan is expected to meet or exceed the goals of the federal amended Recovery Strategy. The 2019 Canada-Saskatchewan Conservation Agreement states that in the absence of range plans, Environment and Climate Change Canada (ECCC) will

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.

³ Saskatchewan Ministry of Environment. 2023. Woodland Caribou in the Boreal Shield (SK1): Background Information. Saskatchewan MOE. Regina, SK.

recommend habitat and mitigation offsetting guidelines, which were provided to the Project by ECCC in 2025⁴. The FEIS was reviewed against the ECCC habitat and mitigation offsetting guidelines.

See **Appendix E** for a detailed technical review completed by Gebauer & Associates Ltd. and Neve Environmental.

3.6.1 Baseline Data and Effects Evaluation

While the FEIS does meet the Project's TOR, the following concerns were identified:

- The limited extent of the RSA hinders a comprehensive assessment of potential Project effects on Woodland Caribou within their range.
- The level of quantifiable detail regarding habitat reclamation and offsetting goals leads to a less effective assessment of potential residual and cumulative effects.
- The minimal amount of information on monitoring protocols and hierarchy of mitigation that will be triggered in response to different scenarios (i.e., adaptive management) leads to a less effective assessment of potential residual and cumulative effects.

Specifically, quantifiable details for habitat reclamation, offsetting goals, monitoring, and adaptive management thresholds are required to conduct a full assessment, as is an RSA that is more reflective of the range of Woodland Caribou.

Given these issues, Denison's conclusion that the Project will not result in residual and cumulative effects is premature. The conclusions are explicitly contingent on future, outstanding documentation and only valid if proposed EA Condition 3 and Condition 5, which require a woodland caribou mitigation and offset plan, are imposed and implemented fully and appropriately. More detailed information is necessary to fully assess potential Project-related effects.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should complete studies to fulfil the needs for quantifiable detail regarding habitat reclamation and offsetting goals.

Recommendation #2: Denison should include MN-S, NR1, and NR3 in any research program regarding woodland caribou.

3.6.2 Monitoring and Management Plans

A preliminary Caribou Management Framework provides a high-level overview of mitigation measures being considered to minimize potential Project effects on Woodland Caribou; however, the Framework does not provide quantifiable details regarding habitat reclamation, offsetting goals, monitoring, and adaptive management thresholds and feedback loops.

Recommendations to address these matters are as follows:

Recommendation #1: Assuming CNSC EA Conditions 3 and 5 are included in the Commission's decision, Denison must provide quantifiable details regarding habitat reclamation, offsetting goals, monitoring, and adaptive management thresholds and feedback loops, and develop these measures in partnership with the Métis Nation.

⁴ Environment and Climate Change Canada (ECCC). 2025. Preparing an Offsetting Plan for Woodland Caribou, Boreal Population.

3.6.3 Cumulative Effects

The FEIS provides considerable information on Woodland Caribou presence and habitat availability; however, the RSA is of insufficient extent, and the proposed mitigation measures have insufficient details to conduct a fully comprehensive assessment of potential residual and cumulative effects. Furthermore, while the Project adds limited anthropogenic disturbance at the SK1 scale, any disturbance to Woodland Caribou and their habitat requires rigorous, specific plans and offsets to mitigate effects and align with goals of the amended federal Recovery Strategy⁵.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should evaluate residual and cumulative effects on Woodland Caribou in the context of a larger RSA and with quantifiable mitigation measures and offsets.

3.7 Impact#7 – Psychological, Social, and Cultural Wellbeing

Cumulative effects in NR1 and NR3 have influenced the social fabric of Métis communities through the following:

- population increases,
- continued alienation from lands and resources and related commercial, subsistence, and cultural practices,
- introduction of drugs and increased availability of alcohol, and
- constraints on families from inflexible work schedules (Two Worlds Consulting 2024b).

For example, distance from "land, river, and Elders" creates a challenge to practice kiyokewin, share cultural teachings, and maintain kinship relationships (Flaminio et al. 2020). These cumulative effects have and continue to erode the psychological, social, and cultural wellbeing of Métis over time. MN-S, NR1, and NR2 shared these concerns with Denison via the Métis Knowledge Study and DEIS technical review, and expected these impacts to be assessed in the FEIS and mitigated for.

Impact #7: NR1 and NR3 Citizens' Key Concerns:

Métis Citizens shared that they are scared about potential adverse Project impacts based on their experiences of other projects, such as the Cluff Lake project. Métis Citizens want a Métis-led Monitoring Committee for the Project to track potential Project effects on Métis wellbeing. For example, Métis Citizens expressed concern for potential Project effects on traffic and associated impacts to roadway conditions and should be involved in monitoring potential adverse effects to Métis as a result of Project-related traffic.

3.7.1 Monitoring and Management Plans

MN-S, NR1, and NR3 shared several concerns about Project effects on psychological, social, and/or cultural wellbeing with Denison. For example, MN-S, NR1, and NR3:

- Expressed concern for Project effects on community cohesion and knowledge transference due to Métis working away from home for long periods (Two Worlds Consulting 2024a),
- Expressed concern for Project effects on the psychological wellbeing of Métis Citizens who bear the mental load of wanting to be employed by the Project and not create stress on family and community well-being as a result of their employment (Two Worlds Consulting 2024a), and

- MN-S, NR1, and NR3 are concerned about potential Project-related spills and malfunctions in Métis communities, and strain on local resources to address spills and malfunctions (Two Worlds Consulting 2024a)

Denison said the concerns identified above would be mitigated through the advancement of reconciliation. Denison leans on policies to address these concerns without indicating how policy effectiveness will be monitored (e.g., anti-harassment policies).

Denison to date has not meaningfully involved or committed to involving MN-S, NR1, and NR3 in the development and implementation of monitoring and management programs that will address wellbeing-related concerns. For example, the Emergency Preparedness and Response Program. Denison states in the FEIS that monitoring of community cohesion at the community level is a responsibility of provincial or federal governments. The MN-S requires Project-led monitoring programs to account for impacts to Métis wellbeing, including community cohesion.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should engage MN-S, NR1, and NR3 to confirm culturally important periods relative to harvest times and cultural camps to support Métis employees taking time off to participate in such activities (a commitment made in the FEIS) prior to Construction.

Recommendation #2: Denison should co-develop an Emergency Preparedness and Response Program (EPRP) with the MN-S, NR1, and NR3 prior to the Construction.

Recommendation #3: Denison should co-develop a Social Monitoring Program with MN-S, NR1, and NR3.

3.7.2 Cumulative Effects

Métis traditional and other land and resource use in NR1 and NR3 continue to be impacted by cumulative effects. For example, a Métis Knowledge Study Advisor shared that his grandfather used to fish on Russell Lake and Close Lake before mining development affected access to the area:

Well, they used to fish...They used to fish in Russell and the mine's kind of took that out. My grandpa. Big trout in there...They didn't want them in there anymore. And they only let certain people through the gate now, like they don't even let regular people through the gate.

Another Métis Knowledge Study Advisor shared that there used to be a lot of berry picking around the mines in Northern Saskatchewan, and now Métis Elders are reluctant to gather near uranium mines (Two Worlds Consulting 2024a). Métis harvesters have observed moose and caribou moving to new locations. These species have adapted to new vegetation and topography, different than their traditional habitat. One Métis Knowledge Study Advisor noted that caribou are moving away from populated areas (Two Worlds Consulting 2024a). They also shared that fallen trees are a barrier to caribou movement as a result of wildfires (Two Worlds Consulting 2024a). In addition to observations about wildlife, Métis harvesters have observed changes to the quantity and quality of plant species (Two Worlds Consulting 2024a). Further, Métis Knowledge Study Advisors shared that blueberries are no longer available in previously known areas that were abundant with blueberries. They acknowledged this is likely the result of drier, warmer summer conditions (Two Worlds Consulting 2024a).

MN-S, NR1, and NR3 shared concerns about Project-related cumulative effects on lands and resources, including the quality and quantity of lands and resources following Project closure. These effects are directly connected to the wellbeing of Métis (Two Worlds Consulting 2024a). The FEIS did not fully assess cumulative effects to Métis or clearly commit to involving Métis in monitoring and management planning to mitigate potential cumulative

effects. For example, Métis should be involved in the design and implementation of monitoring and management plans such as the Preliminary Decommissioning Plan and Detailed Decommissioning Plan.

Recommendations to address these matters are as follows:

Recommendation #1: Denison should co-develop Project monitoring plans including the Preliminary Decommissioning Plan and Detailed Decommissioning Plan with MN-S, NR1, and NR3.

Recommendation #2: Denison should obtain sign-off from MN-S, NR1, and NR3 before the lands are transitioned to the Institutional Control Program to ensure that they meet Métis decommissioning and post-decommissioning standards.

4.0 CONCLUDING REMARKS

In conclusion, Denison must address the outstanding archaeology, engagement, fish and fish habitat, economics, water quality, and woodland caribou impacts summarized in this technical review.

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APPENDICES

APPENDIX A: Key Métis Knowledge Study Figures

The following key figures and maps showcase Northern Region 1 and Northern Region 3 Métis Knowledge gathered through interviews for the Wheeler River Project's Métis Knowledge Study (Two Worlds Consulting 2024a):

Figure 1. Métis Seasonal Round




MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	JAN	FEB		
Early Spring		Late Spring		Summer			Fall		Early Winter		Late Winter		
Breakup							Freeze Up						
Gather chaga mushrooms, Labrador tea, wood, rat root		Gather gull eggs	Prepare for wild rice harvest: rake lakes		Subsistence and Commercial Fishing: Pickerel, Jackfish, Trout, Mariah, Walleye, White fish		Gather berries, Harvest wild rice		Gather berries	Hunt ptarmigan	Trap, beaver, mink muskrat, wolf, foxes, coyote, lynx	Ice Fishing	Caribou hunt
		Moose Hunt					Bear hunt						
		White tail deer Hunt											
				Trapping rabbits									
Travel by canoe, boat, quads						Travel by dog team, skidoo, quads							
Primeau Lake, Donaldson Lake, Goldfields, Fox Lake Road, Russell Lake			Cree Lake, Tazin Lake, Wollaston Lake, Highrock Lake, Cigar Lake, Close Lake			Primeau Lake, Knee Lake, Lake Athabasca, Goldfields, Costigan Lake, Key Lake, Fox Lake Road			Russel Lake, Key Lake		Cree Lake, Lake Athabasca		

Figure 2. Métis Land and Resource Use in and around the Wheeler River Project

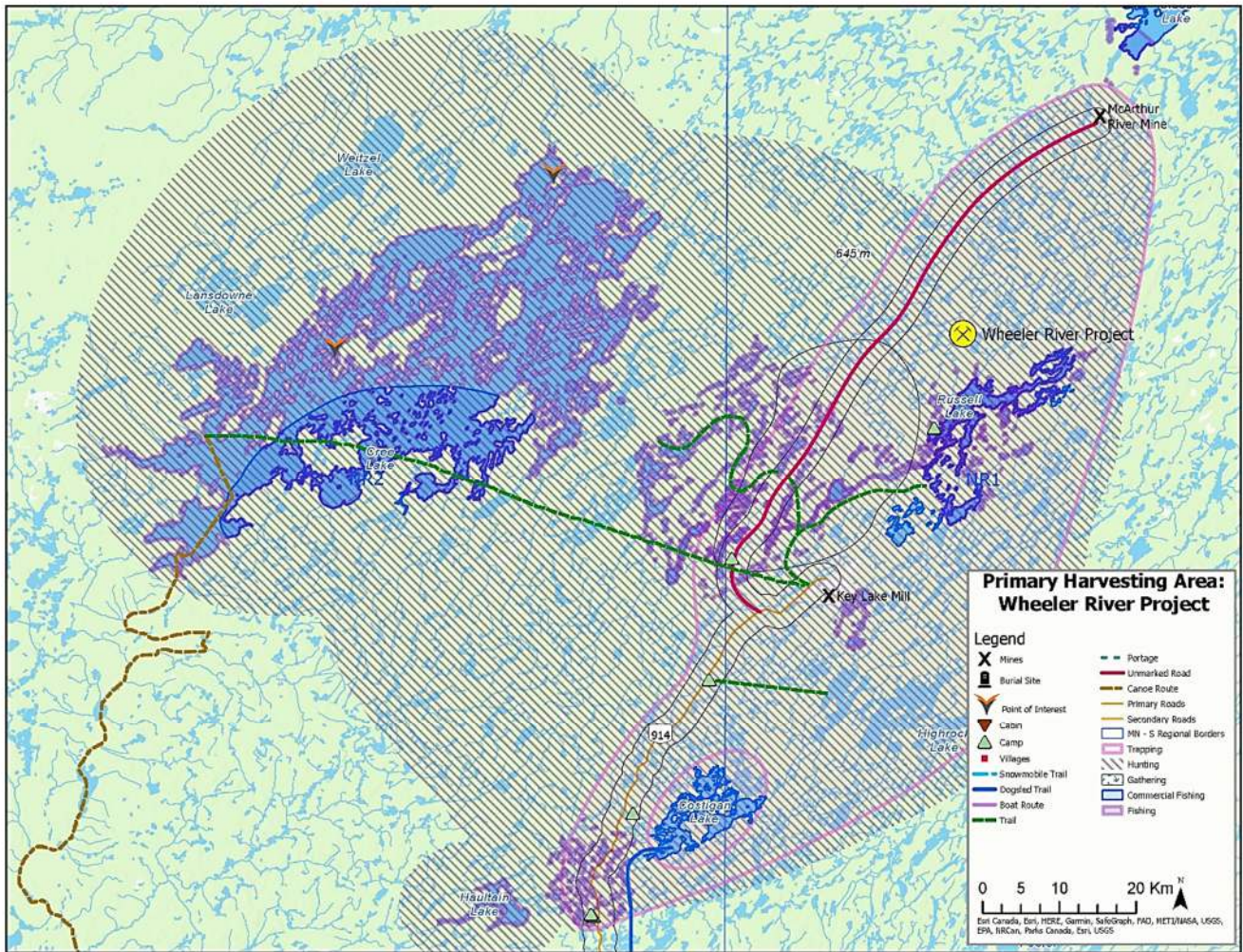


Figure 3. Métis Land and Resource Use Along the Highway 914 Corridor

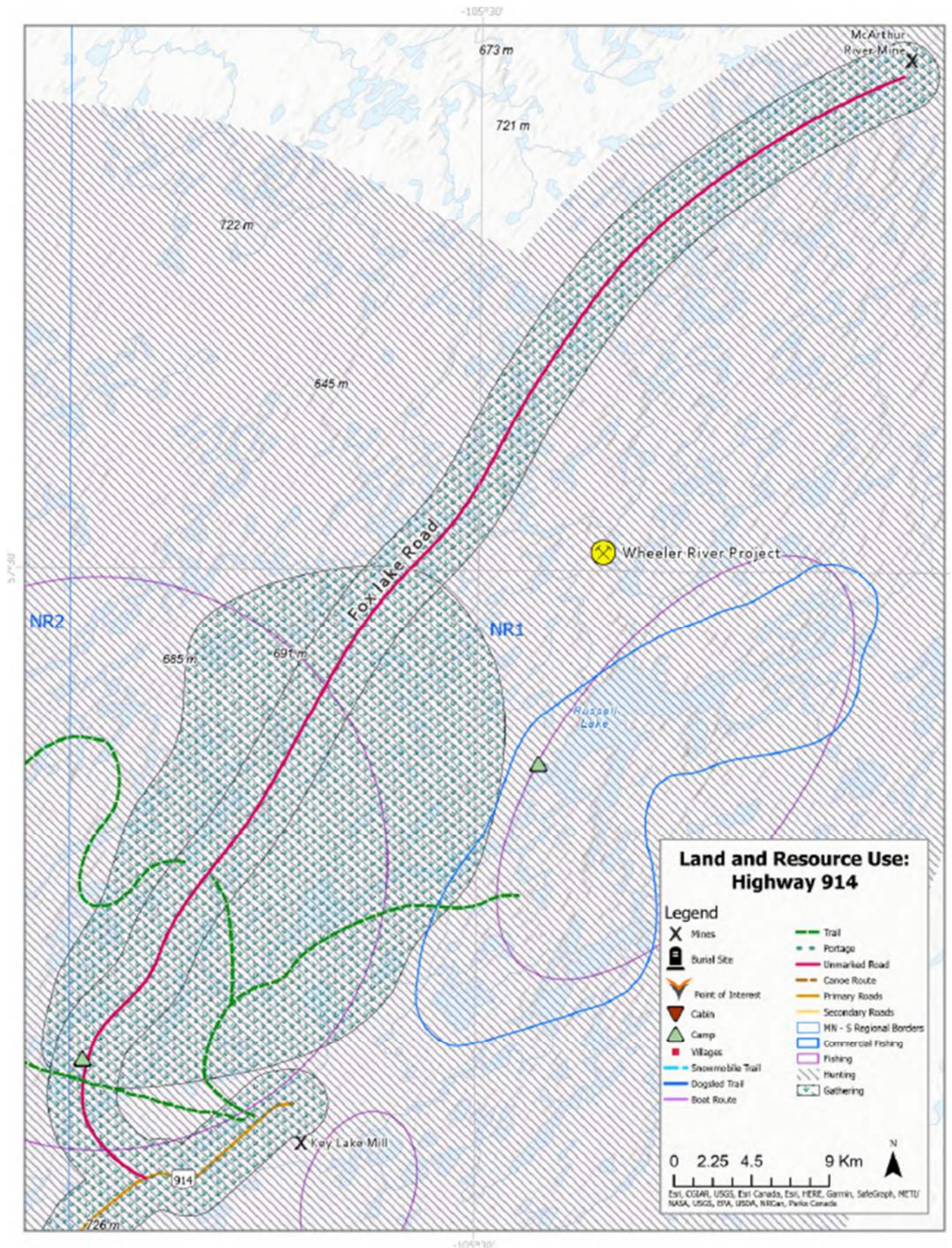


Figure 4. Métis Land and Resource Use Along Fox Lake Road

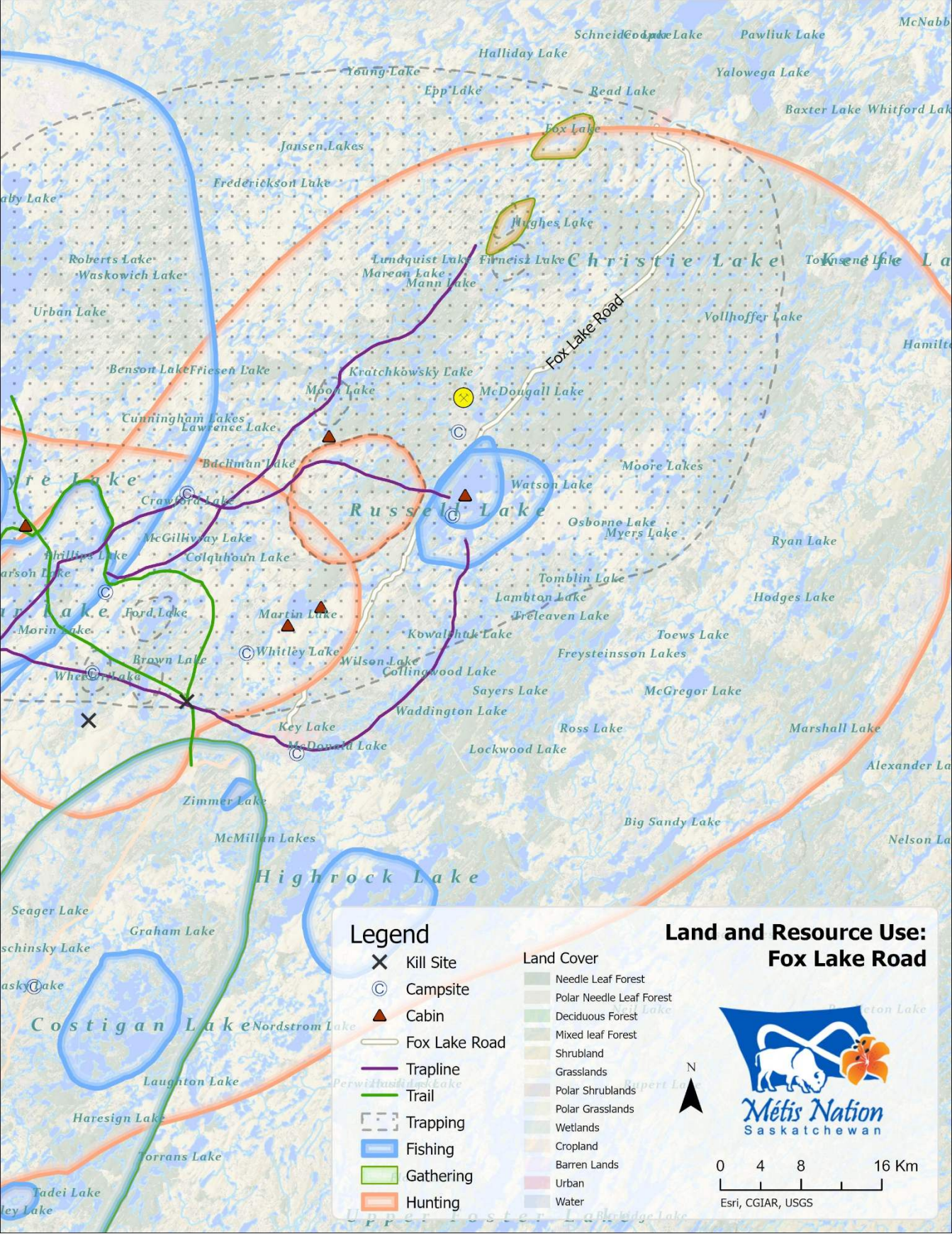
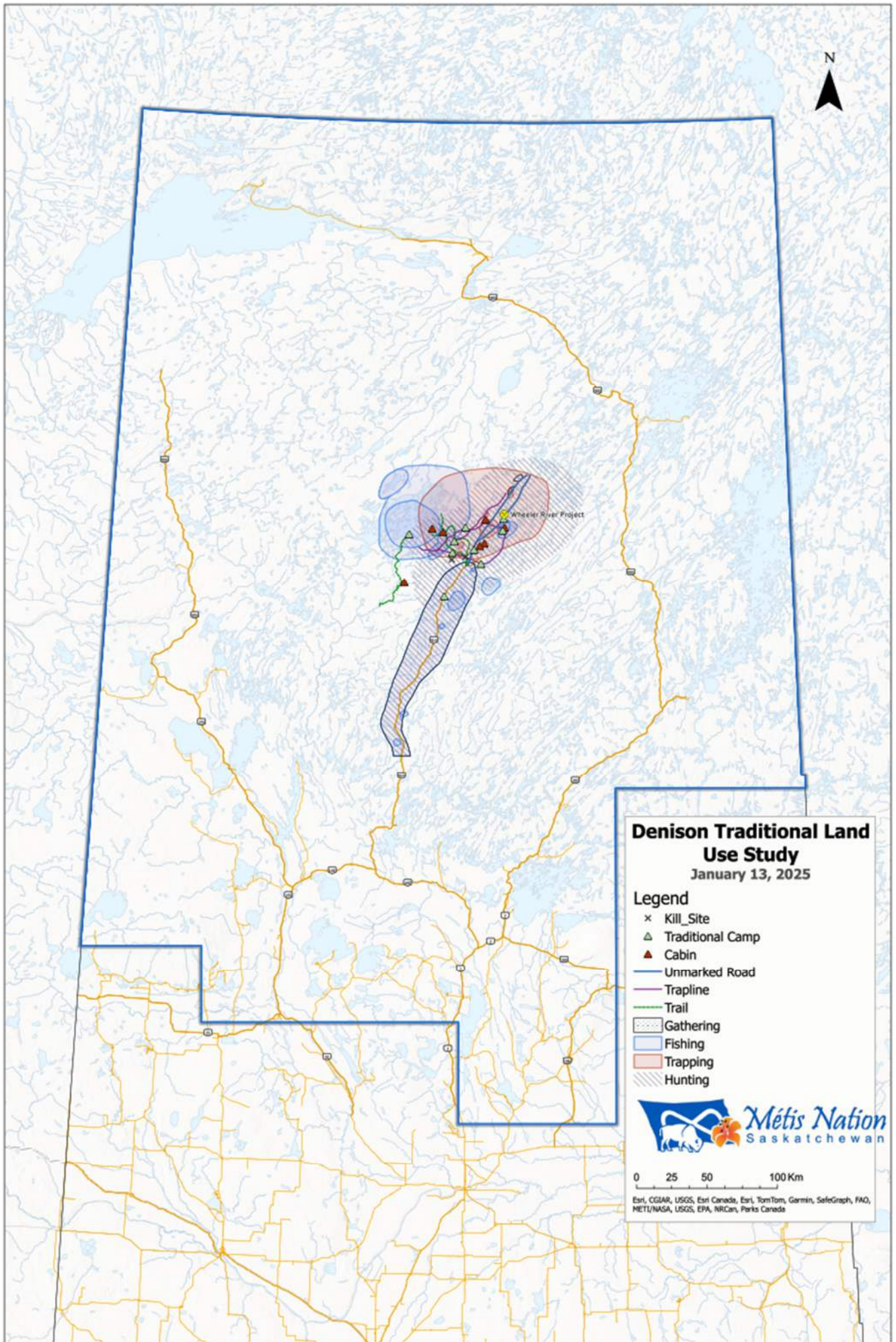


Figure 5. Métis Land and Resource Use in Northern Region 1 and Northern Region 3



APPENDIX B: Denison Responses to Métis DEIS Comments

Appendix C-3: SML Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Sipishik Métis Local #37	Current use of lands and resources for traditional purposes	Interest in understanding how IK and history is integrated in EIS.	ROC 62	<p>Denison has supported several processes to aid community-led collection of IK. Section 3.4.2 provides detail on these processes and outcomes. Studies and reports incorporated throughout the Draft EIS include those provided by ERFN, KML, and YNLR on behalf of the Athabasca Denesųliné. A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study. Denison will continue to consider and integrate results from and forthcoming materials provided by communities as it advances the EIS process.</p> <p>Denison has recorded and stored information regarding IK, LK and engagement activities in an Engagement Database. Within the database, records are given unique identification numbers. These numbers are referenced throughout the EIS, but particularly in Parts II and III, to indicate where specific information from the database has been integrated into the assessment Within each section of Part II and Part III are subsections titled “Influence of Indigenous Knowledge, Local Knowledge and Engagement on the Assessment”. Within these subsections are summary tables that provide additional details related to each one of the unique identification numbers referred to in that section.</p>	Section 3 provides information on IK and LK and how this information was integrated throughout the EIS. Indigenous Knowledge has been integrated throughout the EIS and a section on the Influence of Indigenous Knowledge, Local Knowledge, and Engagement is provided in the methodology for sections. For example see Section 11.1.2 and Section 11.2.2 for further details on how Indigenous Knowledge, Local Knowledge, and Engagement influences Land and Resource Use.	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Sipishik Métis Local #37	Current use of lands and resources for traditional purposes	It was noted that development of a TK map for the community had not been undertaken due to funding pressures, but that the traditional territory of the people of Beauval was typically described to reach from Tipppo Lake east of Beauval to the Primrose Air Weapons range to the west and north to the Patterson Lake area.	ROC 116	Denison understands that the Métis Knowledge Study, undertaken by MN-S on behalf of the Locals who have delegated the Duty to Consult to it, would be representative of the Sipishik Métis Local #37. As a result, please see information pertaining to Interests, Issues and Concerns in relation to the MN-S and the associated Métis Knowledge Study.	N/A	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Sipishik Métis Local #37	Health and socio-economic conditions	Concern with racism and other factors in workplace affecting employee retention.	ROC 62	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website.	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.		resolution on these issues.		
Sipishik Métis Local #37	Other	Question about credentials required to undertake environmental monitoring. Interest in having transparency of environmental monitoring data for operating mines.	ROC 62	Public Information and Disclosure (CNSC 2018) sets out requirements and guidance for public information and disclosure for licensees and applicants of Class I and Class II nuclear facilities, and uranium mines and mills, for all lifecycle phases. The primary goal of the public information program, as it relates to the licensed activities, is to ensure that information related to the health, safety and security of persons and the environment, and other issues associated with the lifecycle of nuclear facilities are effectively communicated to the public. Denison would meet all requirements set out in this REGDOC, including the development of an appropriate public information program and disclosure protocol.	N/A	Ongoing - Sipishik Métis Local #37 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Appendix C-4: PML Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Patuanak Métis Local #82	Other	Patuanak Métis expressed interest in pursuing a relationship with Denison as this had not been previously pursued with companies prior.	ROC 142	Before 2019, Denison undertook engagement activities in the Patuanak area (including with PML more broadly through work done in relation to the ERFN Wapachewunak reserve, consistent with the strong interconnections in the area. In mid-2019, Denison was advised by the Province of Saskatchewan of the interest of PML in relation to the Project. As a result, beginning June 2019, Denison began engaging directly with PML. This included sending correspondence to PML about the Project description, having informal discussions pertaining to their interests in the Project, and hosting a site visit (2019) and a meeting jointly coordinated by the MN-S (2019). See Section 4.3.2.4 for more information. In 2019, the PML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing PML in respect of engagement with Denison for the Project. Since then, Denison has been engaging with MN-S on behalf of PML and other Métis Locals. For details of this engagement, see Section 4.3.4.1. For engagement that occurred with PML in 2019. These key engagement activities were supported by ongoing engagement methods including, but not limited to, those outlined in Section 4.2.1.	Patuanak Métis Local #82 has delegated the duty to consult to the MN-S.	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Patuanak Métis Local #82	Other	Questions and clarifications on ISR mining methodology, including freeze wall technology.	ROC 62	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface.</p> <p>Section 2.2.1.3 provides information on freeze wall technology. The freeze wall is intended for tertiary containment of mining solution to support a defence in depth strategy as additional, site-specific data is obtained on hydraulic containment. The freeze wall around the mining area will extend from the surface to the basement rock, isolating the mining area from regional groundwater. The freeze wall is expected to be a minimum of 10 m thick, be installed 25m away from the uranium deposit, and extend 30 m into the basement rock. Data from the groundwater monitoring network installed in and around the wellfield and freeze wall will make sure the freeze wall is meeting design specifications.</p>	N/A	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
Patuanak Métis Local #82	Other	Questions were asked regarding malfunctions during the process.	ROC 62	A standalone Accidents and Malfunctions (A&M) assessment was completed and is summarized in Section 14 of the EIS (full report is Appendix 14-A of the EIS). The A&M assessment considered almost 70 accident scenarios including many that would relate to the unplanned release of chemicals and radiation to the environment with potential to effect country foods. Specific scenarios including the release of chemicals and radiation to the aquatic environment and to the terrestrial environment adjacent to the ERFN and KML culture camps located along Hwy 914. The overall risks in consideration of likelihood and consequence were characterized as low. The assessment concluded that with planned engineering / environmental design features, mitigation measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical.	N/A	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Patuanak Métis Local #82	Other	Questions were asked regarding if the wastewater would be treated.	ROC 1	<p>Wastewater will be treated as part of water management for the Project. Treated Effluent Monitoring and Release Ponds in Section 2.2.3.9 of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond.</p> <p>Denison expects the Provincial Approval to Operate a Pollutant Control Facility will contain specific effluent quality limits and monitoring to confirm effluent quality meets the approved limits. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.</p>	Wastewater will be treated as part of water management for the Project. Treated Effluent Monitoring and Release Ponds in Section 2.2.3.9 of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.	Ongoing - Patuanak Métis Local #82 has delegated the duty to consult to the MN-S. Denison and MN-S are committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Appendix C-7: ALBML Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
A La Baie Métis Local #21	Other	A concern was expressed about racism despite a “zero tolerance” policy.	ROC 62	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
A La Baie Métis Local #21	Other	Interest about discharge testing.	ROC 62	<p>During Construction, no effluent is expected to be released to the aquatic environment. Contact water stored in the Clean Waste Rock Pond during Construction and will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / license requirements. The sequence for Construction activities will occur in a logical manner based on Project execution plans. For example, construction of the wellfield runoff pond will be prioritized during the early part of Construction and it will be able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the Clean Waste Rock Pond. Other secondary contingency measures are also available should the volume of water requiring management exceed site infrastructure storage volume. This could include use a hydrovac for offsite disposal.</p> <p>Treated Effluent Monitoring and Release Ponds in Section 2.2.3.9 of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond.</p>	The Project will adhere to treated effluent discharge limits as stipulated in operating approvals and by regulations and for protection of aquatic life and receptors associate with the water exposure pathway.	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				Denison expects the Provincial Approval to Operate a Pollutant Control Facility will contain specific effluent quality limits and monitoring to confirm effluent quality meets the approved limits. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.				
A La Baie Métis Local #21	Other	Questions and clarification about the ISR mining process, including alternative power usage and transportation of acid.	ROC 1 ROC 62 ROC 197	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface.</p> <p>Section 2.2.1.3 provides information on freeze wall technology. The freeze wall is intended for tertiary containment of mining solution to support a defence in depth strategy as additional, site-specific data is obtained on hydraulic containment. The freeze wall around the mining area will extend from the surface to the basement rock, isolating the mining area from regional groundwater. The freeze wall is expected to be a minimum of 10 m thick, be installed 25m away from the uranium deposit, and extend 30 m into the basement rock. Data from the groundwater monitoring network installed in and around the wellfield and freeze wall will make sure the freeze wall is meeting design specifications.</p> <p>Sections 2.2.6.1 and 2.2.6.2 provide information on primary and back-up power supplies. Electrical service to the Project will be provided via an approximate 5-km extension tap from the existing 138 kV overhead transmission line that runs along Highway 914. To provide electrical service during times of utility outages, diesel generators will be installed to service the site and maintain essential functions.</p>	N/A	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.
A La Baie Métis Local #21	Other	Questions were asked regarding the quality and number of lakes tested.	ROC 62	<p>Surface water quality was sampled during 2016, 2018, and 2019 at lakes and watercourses within the LSA and RSA (Figure 8.2-4 and Appendix 8-D). Sampling at lakes and ponds included the measurement of both physical and chemical parameters obtained in situ during field surveys and by laboratory analysis.</p> <p>Locations of interest for this assessment nodes that are coincident with baseline monitoring stations and/or watersheds of interest to the assessment. Surface water quality along with other study components were sampled at stations SA-1, SA-2, SA-3, SA-4, SA-5, SA-6, SB-3, SB-5, LAB, LB-2, LA-1, LA-5, and LA-6. These stations are located on the Iclander River, McGowan Lake, Whitefish Lake North, Whitefish Lake South, Russell Lake Inlet, near the outlet of Williams Lake as shown in Figure 8.2-4.</p> <p>As detailed in descriptions of existing surface water quality (Section 8.2.3.3), parameters where water quality guidelines were available, most were below their respective guidelines at all sampling locations. Cases where constituent concentrations exceeded guidelines are detailed in Table 8.2-2. Generally, at least one sample from each waterbody within the LSA contained aluminum concentrations that exceeded the SEQG. In some cases, such as waterbodies LB-2 and SB-3, all water samples exhibited aluminum concentrations higher than</p>	N/A	Ongoing - A La Baie Métis Local #21 has delegated the duty to consult to the MN-S. Denison is committed to working toward a resolution on these issues.	Delegated the duty to consult to the MN-S.	Discussions continue with MN-S about working toward a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				the SEQG. There were also several instances where water pH was below the lower threshold of the CCME CWQG for the Protection of Aquatic Life, such as samples from Whitefish Lake North, SA-1, SA-3, SA-5, SA-6, SB-3, and SB-5 (Table 8.2-4). Other metals that had higher concentrations than their guidelines included lead, iron, and cadmium, though in these cases, the maximum concentration was only marginally above the guideline value.				

Appendix C-9: MNS Key Interests, Issues and Concerns

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes	Interest and questions asked about IK including how Denison is pursuing this, the process of obtaining IK, and whether money was available for IK studies.	ROC 62	A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (including for Sections 4, 11, 12, and 13).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; other	<p>The EIS notes that “In 2021, Denison announced the adoption of an Indigenous Peoples Policy (IPP). The IPP reflects Denison's recognition of the important role of Canadian business in the process of reconciliation with Indigenous peoples in Canada and outlines Denison's commitment to take action towards advancing reconciliation. The IPP was developed based on Denison's experiences with, as well as feedback and guidance received from, Indigenous communities with whom Denison is actively engaged. This approach was designed to make sure the IPP appropriately captures a mutual vision for reconciliation. The IPP identifies five key areas of action that will support the ongoing development of a continuously evolving Reconciliation Action Plan (RAP): Engagement; Empowerment; Environment; Employment; and Education. Through the RAP, Denison is striving to interweave the principles of reconciliation throughout all areas of the company's operations (Denison 2021a).”</p> <p>Denison does not explain how it will accomplish free, prior, and informed consent (FPIC) as per the IPP and RAP [2].</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to clarify how it intends to consider free, prior, and informed consent (FPIC). <p>[2] Engagement – We are committed to building long-term and mutually respectful relationships through proactive engagement and consultation with Indigenous people. Our aim is to work to achieve the free, prior, and informed consent, where the potential for impacts to rights may occur, before proceeding with economic development projects and during ongoing activities and operations</p>	MN-S Public Comments (March 4, 2023) (Public Comment #456)	Denison's IPP is a principles based policy and addresses its vision for reconcile-action in all of Denison's activities. How the policy will be executed will vary on a project to project and community to community basis. The process includes a continually evolving Reconciliation Action Plan, that Denison will seek periodic input on from its Indigenous partners to ensure that it remains relevant to in the ongoing evolving landscape of reconciliation.	Denison will seek periodic input on from its Indigenous partners to ensure that it remains relevant to in the ongoing evolving landscape of reconciliation	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>Denison’s Draft EIS notes that Denison and MN-S were in the process of developing a capacity funding agreement. Since the Draft EIS was published, Denison and MN-S reached an agreement.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to revise the Final EIS to note that a capacity funding agreement was reached with MN-S.	MN-S Public Comments (March 4, 2023) (Public Comment #462)	The EIS will be updated to reflect the capacity funding agreement reached with the MN-S.	Section 4 of the EIS is updated to reflect the capacity funding agreement reached with the MN-S.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for	<p>Métis input to VC selection was limited to NR3 communities.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to confirm the selected valued components with	MN-S Public Comments (March 4,	At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings,	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1	Ongoing - Denison is committed to	Response to MN-S comments	Discussions continue with MN-S about

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
	traditional purposes; Other	Métis Locals in NR1 and NR3 and revise the Final EIS as required to reflect their input. - Denison needs to include in the Final EIS input from the Métis Knowledge Study and any changes in the selection of VCs and their characterization.	2023) (Public Comment #463, #487)	Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time. A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	working toward reaching a resolution on these issues.	were provided on December 1, 2023	working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The use of “complimentary and influential” does not reflect current best practices that acknowledge Indigenous Knowledge as an equal but different way of knowing (than western science). This terminology implies that Indigenous Knowledge can be absorbed into a scientific approach. Recommendations: - Denison needs to confirm use of the wording “complimentary and influential” and how the use of Indigenous Knowledge is treated as equal to western science in the Final EIS. - Denison needs to confirm if it intends the use of “complimentary” or “complementary”. Best practices will differ depending on intention.	MN-S Public Comments (March 4, 2023) (Public Comment #464)	Section 5.1 of the EIS explains that the project is assessment under the Canadian Environmental Assessment Act, 2012, along with the Saskatchewan Environmental Assessment Act. As such, the Canadian Environmental Assessment Agency's reference guidance (CEAA 2015) on considering Aboriginal traditional knowledge for EAs under the Canadian Environmental Assessment Act 2012 is considered as relevant guidance. Further to this (see Section 3.3.1 of the EIS) Denison has committed to working with Indigenous communities in a spirit of mutual respect and cooperation. Denison's Indigenous Peoples Policy reflects the company's belief that reconciliation is advanced through collaboration with Indigenous peoples and communities to build long-lasting, respectful, trusting, and mutually beneficial relationships. Section 3.2.2 of the EIS notes that access to Indigenous Knowledge is a privilege and must be respected. Prior to sharing and collecting IK, local protocols and procedures developed by the Indigenous COIs for the management of IK were requested and applied. For some communities, this meant Indigenous Knowledge was shared with Denison and its consultants for use in the EIS with measures in place to protect the privacy of the IK, and in others communities consented to reports being shared and appended to the EIS itself. Denison will continue to work with the Indigenous COIs to ensure this information is shared and protected in manner consistent with community protocols. Noted, the use of 'complimentary' and 'complementary' will be revisited throughout the EIS.	Section 5 was updated (re: complimentary vs complementary)	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Denison acknowledges that cumulative effects are important to Indigenous communities in section 5.9.3. For many Indigenous communities and governments, cumulative effects analysis requires an assessment this includes pre-development conditions to understand the impacts of past and existing activities that continue to affect the context for environmental and social systems. Considering the fuller context of historic change during an EA is an evolving best practice and is recognized through numerous Canadian cumulative effects assessment initiatives and management frameworks (e.g., Indigenous Centre for Cumulative Effects) and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process). Recommendations:	MN-S Public Comments (March 4, 2023) (Public Comment #468)	With respect to review comment i) the following is noted. Section 5.9.2 of the draft EIS provides an overview of other Projects and activities that were considered present and reasonably foreseeable and could be a source of residual effects that could interact with the Project-specific residual effects. A preliminary list of projects and activities for potential consideration in the VC-specific cumulative effects assessment for the Project was provided in Table 5.9-1 of the draft EIS and their locations were shown relative to the Project site in Figure 5.9-1. Per Section 5.9.2.1 of the draft EIS, the original (or "preliminary") list of Projects and activities was scrutinized relative to various screening criteria to identify those present and reasonably foreseeable Projects and activities that were likely to interact with the Project VC in cumulative manner. It was this subset of Projects and activities that was carried forward into the cumulative effects assessment as described in Section 5.9.2.1.1 of the draft EIS.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		<ul style="list-style-type: none">- Denison needs to provide further detail on what projects and activities were considered in the cumulative effects i.e., table listing projects.- Denison needs to provide further detail on how it considers cumulative effects important to Indigenous communities and whether it includes an evaluation of changes to pre- development conditions as is being done as practice in other environmental assessments. This would allow Indigenous communities to better understand the ongoing impacts of past and existing activities that continue to affect Indigenous cultural use of lands and resources.		<p>With respect to comment ii) the following is noted. The Wheeler River Project EIS is subject the Canadian Environmental Assessment Act, 2012. In this assessment framework, the Project-specific cumulative effects assessment (CEA) considers whether residual adverse effects of the Project on a given VC will overlap spatially and/or temporally with residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. The CEA follows standard methodology as per provincial (e.g., Guidelines for an Environmental Assessment [Government of Saskatchewan 2022]) and federal guidance (e.g., Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 [Government of Canada 2019]). As noted in the IR, Section 5.9.3 of the draft EIS describes how Denison considers the cumulative effects assessment to be important to Indigenous peoples. As noted, the cumulative effects assessment is important to Indigenous communities because incremental effects to the environment can weaken resource economies, affect important resources such as plants, fish, and wildlife, affect rights-based and cultural activities, and affect both the health of wildlife and humans. Denison also noted and acknowledged the important relationship of the Indigenous Communities of Interest to the lands and waters in the Project study areas and sought out information from Indigenous Communities of Interest (ERFN and the Kineepik Métis Local #9 at Pinehouse (KML)) with respect to their Indigenous Knowledge on past, present, and predicted cumulative effects. Denison believes that the cumulative effects assessment does appropriately consider changes to pre- development conditions.</p> <p>References Government of Canada. 2019. Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012. https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-ceaa2012.html. Government of Saskatchewan. 2022. Guidelines for an Environmental Assessment. https://www.saskatchewan.ca/business/environmental-protection-and-sustainability/environmental-assessment/does-my-project-need-an-environmental-assessment.</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>Key waterbodies are inconsistently named on the maps/figures throughout Section 8.0 Aquatic Environment. Key waterbodies include those considered as reference or exposure waterbodies, and any others of importance to NR2 and NR3 Locals.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to revise maps/figures to include labels for key waterbodies referenced in the EIS, particularly for figures included in section 8.- Denison needs to ensure waterbodies are named consistently throughout section 8.0 Aquatic Environment.	MN-S Public Comments (March 4, 2023) (Public Comment #472)	Acknowledged. Denison will update all maps/figures throughout Section 8 in the final EIS to more consistently include lake names.	Denison will update all maps/figures throughout Section 8 in the final EIS to more consistently include lake names.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for	Not all fishing and hunting activities are documented. Currently, the MKS has not been completed and therefore this assumption may be incorrect.	MN-S Public Comments (March 4,	The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1	Ongoing - Denison is committed to	Response to MN-S comments	Discussions continue with MN-S about

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	traditional purposes; Other	Recommendations: - Denison needs to revise the fish and fish habitat section as part of the inclusion and consideration of the MKS in the Final EIS. - Denison needs to include additional information in the Final EIS that describes data limitations. A conservative approach would consider all waterbodies in the area to be potential fishing waterbodies for current and future use purposes.	2023) (Public Comment #473)	<p>MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.</p> <p>While Denison acknowledges the comment regarding what it perceives as a desire to include more regional data regarding fishing waterbodies of interest to MN-S within the context of cumulative effects, it believes the draft EIS and supporting documentation (including the aquatic environment baseline report, Appendix 8-D) provide a spatially extensive and appropriate description of fish habitat and fish resources in water bodies and water courses to assess potential cumulative effects given the spatial extent of Project interactions with the environment. For the purpose of a Project-specific CEA a cumulative effect can only exist when a residual Project effect overlaps in time and space with other current or reasonably foreseeable projects / activities. Where no such overlap exists, it is beyond the scope of a Project-specific CEA.</p>	and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	working toward reaching a resolution on these issues.	were provided on December 1, 2023	working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Russell Lake is not identified as a location to monitor fish health. Recommendations: - Denison needs to include Russell Lake in the aquatic monitoring program as cumulative effects from the Key Lake operation will be detected in this waterbody and this is an important local fisheries resource waterbody. - Denison should commit to involving MN-S, NR1 and NR3 in the development of management and monitoring plans for the aquatic environment in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #474)	As indicated in the review comment, Russell Lake was not specifically referenced as a location to monitor fish health. This would be based on the draft EIS conclusion that environmental change that might affect fish health (e.g., water quality) would not extend beyond the LSA and into Russell Lake. This however does not preclude incorporating Russell Lake into follow up monitoring based on alternative rationale. Specific details for follow up monitoring program design have yet to be developed and the appropriateness / suitability of sampling areas (including Russell Lake) will be evaluated through that process. Such determinations as to the appropriateness of sampling areas to be utilized for follow up monitoring for the aquatic environment will be made when that monitoring program / plan documentation is developed and would be subject to discussion with Interested Parties. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>extensive to measure EIS predictions.</p> <p>For further reference the following provides an overview of the information presented in the draft EIS and its supporting documentation regarding Russel Lake. Aquatic baseline surveys were conducted at two stations (LAB-1 and LAB-2) in Russell Lake and were considered ‘far-field’ stations in relation to the proposed mining plan for the Wheeler River Project. Data collection methods and results are presented in the draft EIS throughout the applicable subsections of Section 8.</p> <ul style="list-style-type: none">• Section 8.2 details the Surface Water Quality methods and results,• Sections 8.3 and 8.5 detail fish habitat, community, and health methods and results; and• Section 8.4 details sediment quality and benthic invertebrate community and chemistry methods and results. <p>A breakdown of where specific processes and results are located for each of these components is presented below:</p> <p>Surface Water Quality/Chemistry: Surface Water Quality was sampled in Russell Lake. Methods and metrics are presented in Section 8.2.3.1. Water was sampled in Russell Lake and presented in Table 8.2-2 (Pages 8-60 to 8-62) of Section 8.2.3.3 of the EIS report, and summarized in Table 8.2-4. Surface Water predicted maximum Constituents of Potential Concern for the Russell Lake Inlet (LAB-1) are presented in Table 8.2-13 of Section 8.2.4.2.4. Cumulative effects are also assessed in Section 8.2.7. Detailed baseline summary data is presented in Appendix 8-D of the report in Table 3-3.</p> <p>Sediment Quality/Chemistry: Sediment was sampled in Russell Lake, and the sample methodology is presented in Section 8.4.3.1. Sediment grain size results are summarized in Table 8.4-2 in Section 8.4.3.2.1, and full data is presented in Appendix 8-D, Table 3-4. Sediment chemistry was summarized in Table 8.4-3, and full data is in Appendix 8-D, Table 3-5.</p> <p>Fish Habitat, Tissue Chemistry, and Community: Russell lake is not clearly indicated in the initial list of sample areas presented in Section 8.3.3 or Section 8.5.3; however, habitat information is presented in the Fish Habitat table (Table 8.3-4) of Section 8.3.3.2, and both Russell Lake sample locations (LAB-1 and LAB-2) and their associated fish community data are presented in the fish community map (Figure 8.3-6). Fish community and information is also presented in Table 8.3-4. Baseline fish community information is presented in Appendix 8-D of the report in Table 3-9. Fish chemistry summary data (Mean, Max, Min) for Northern Pike and White Sucker bone and tissue samples is presented in Table 8.5-2 of Section 8.5.3 of the Draft EIS. Detailed fish tissue data summary is presented in Appendix 8-D of the report in Table 3-10.</p> <p>Benthic Invertebrate Chemistry and Community: Benthic invertebrates were sampled in Russell Lake, and the sample methodology is presented in Section 8.4.3.1. Benthic invertebrate endpoints are summarized in Table 8.4-4 of</p>				

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				<p>Section 8.4.3.2.4, and benthic invertebrate chemistry is summarized in Table 8.4-5. Detailed baseline benthic invertebrate community and chemistry data is presented in Appendix 8-D of the report in Table 3-8, and community data in Tables 3-7A to 3-7D.</p> <p>Also, refer to Cumulative Effects sections within each part of the Aquatic Environment assessment in the draft EIS for a discussion of potential cumulative effects in Russell Lake. (i.e., Section 8.2.7 for surface water quality; Section 8.3.7 for fish and fish habitat, 8.4.7 for sediment quality and benthic invertebrates, and 8.5.7 for fish health).</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>It is unclear whether there is a physical barrier between Whitefish Lake North and Whitefish Lake South that would allow Whitefish Lake North to be considered as an appropriate reference area for monitoring fish health.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to clarify in the Final EIS on an appropriate reference area for monitoring fish health.- Denison needs to confirm fish movements between Whitefish Lake North and Whitefish Lake South and that Whitefish Lake North will be an appropriate reference lake. If it is not appropriate, then another reference lake such as Kochichowsky Lake may need to be considered for monitoring fish health.	MN-S Public Comments (March 4, 2023) (Public Comment #476)	<p>To clarify, there is no physical barrier between the north and south portions of Whitefish Lake.</p> <p>As indicated in the review comment the north basin of Whitefish Lake was suggested in the EIS as a potential upstream or reference monitoring for aquatic environment endpoints, including those related to fish health. Specific details for follow up monitoring program design have yet to be developed and the appropriateness / suitability of sampling areas will be evaluated through that process. The north basin of Whitefish Lake is the most proximal aquatic feature upstream of where treated effluent would be discharged and in that regard is a good candidate as a reference or non-influenced area. It is understood that proximity is not the only consideration as to the suitability of an area to be utilized as a reference area - as indicated in the review comment fish movement and mobility between sampling areas is also an important consideration since it is necessary to make comparisons, in the case of fish health, between / among independent fish populations. Such determinations as to the appropriateness of sampling areas to be utilized for follow up monitoring for the aquatic environment will be made when that monitoring program / plan documentation is developed and would be subject to discussion with Interested Parties.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The terrestrial RSA seems small in consideration of woodland caribou and determining the impacts of the Project in association with the SK1 caribou population.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to evaluate the terrestrial RSA as it relates to the SK1 caribou population and Environment Canada’s woodland caribou management plan. Provide a detailed explanation in the Final EIS as to how the terrestrial RSA was determined.	MN-S Public Comments (March 4, 2023) (Public Comment #477)	<p>The Project Area was delineated to capture all direct, and most indirect, likely adverse effects on caribou; as this is the zone of influence most likely to affect caribou in the vicinity of the Project (i.e., in the vicinity of human activity, equipment use and vehicle use). The Project Area (169.6 ha) is the direct footprint of proposed Project infrastructure (74.8 ha) with a buffer applied, thereby representing the area of maximum physical disturbance. The Project Area is not VC-specific, but consistent throughout the EIS.</p> <p>The Wildlife LSA was designed to capture the majority of the Project effects. The LSA extends beyond Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. That is the primary rationale for selection of the spatial extent of the LSA – Denison believes this is an appropriate spatial scale that applies broadly to the wildlife VCs as a whole given the perceived mechanism of VC-Project interaction.</p> <p>Importantly, as noted in draft EIS Section 9.3.6.4, in the caribou assessment, the</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>Project Area had a 500 m buffer applied to account for indirect effects/habitat alteration; this area is within the wildlife LSA (refer to Figure 9.3-14 for a map showing the spatial areas). The 500 m buffer for habitat alteration for caribou was selected in accordance with ECCC’s (2020) assessment of disturbed areas, which buffered (500 m) anthropogenic disturbances to evaluate woodland caribou habitat. The alteration of available woodland caribou habitat is quantified in this EIS by applying a buffer of 500 m around the Project Area in which Project effects in the form of sensory disturbance are likely to affect available woodland caribou habitat and make it functionally unavailable for use.</p> <p>Boreal caribou occur as one continuous population across the SK1 range, including within the Terrestrial RSA. It was decided to not use the entire SK1 range as an assessment area (e.g., due to the dilution factor) and instead use the Terrestrial RSA to appropriately and adequately assess residual and cumulative effects in proportion to the Project. It was deemed to be not feasible to use a large area like the SK1 range to assess residual Project effects because this would provide inappropriate context or "dilute" the adverse effects of the Project on the caribou that have a home range that overlaps with the RSA.</p> <p>The reviewer is also referred to the response provided to Information Requirement (IR) No. 137 from the Federal Indigenous Review Team (FIRT).</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>There is inadequate evaluation of the combined impact of all of these changes in vegetation on the terrestrial ecosystem. It is unclear whether there will be any short-term or long-term impacts on the overall health of the terrestrial ecosystem due to the individual changes to the terrestrial components.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to provide in the Final EIS an assessment of the cumulative impacts of all of the individual changes to the vegetation (e.g., change in vegetation types, a change in the COPC levels in vegetation and a change in wetland composition) on the entire terrestrial ecosystem.	MN-S Public Comments (March 4, 2023) (Public Comment #479)	<p>The assessment of potential Project related effects on the vegetation VCs followed standard assessment methodology using specific KIs and associated MPs. There is no practical, reliable way to combine all of the various KIs and associated MPs into a single, combined expression of potential effects as suggested by the review comment. The standard approach and practice is that each VC is evaluated independently using the KIs and associated MPs, setting appropriately conservative effects thresholds.</p> <p>As outlined in draft EIS Section 9.2.7.4, the residual effects of the Project, in conjunction with the comparable residual effects from past, present, and reasonably foreseeable future projects on the vegetation abundance and constituent concentrations in vegetation KIs were predicted to be not significant. Thus, the cumulative effects are not expected to alter the integrity of the Vegetation and Ecosystems VC (i.e., it remains sustainable and available to contribute to ecological functions) and is predicted to be not significant. Similarly, the residual effects of the Project, in conjunction with the comparable residual effects from past, present, and reasonably foreseeable future projects on the listed plant species and wetlands KIs were predicted to be not significant. Thus, the cumulative effects are not expected to alter the integrity of the Listed Plant Species VC and Wetlands VC (i.e., they remain sustainable and available to contribute to ecological functions) and are predicted to be not significant.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for	The EA assumptions for moose harvest numbers and success are based on the SK database information which includes information for hunters in the southern portion of the province and for non-Indigenous peoples. Reliance on draw licences to support Project	MN-S Public Comments (March 4, 2023) (Public	With respect to bullet #1 the following is noted. Denison can confirm that the information provided in Section 9.3 (as well as 11.1) of the Draft EIS related to moose harvest data is based on the information that was publicly available from the Saskatchewan Ministry of Environment to contextualize moose harvest in	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the	Ongoing - Denison is committed to working	Response to MN-S comments were provided	Discussions continue with MN-S about working toward

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	traditional purposes; Other	<p>models does not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. Métis do not participate in the draw system as they are recognized rights holders.</p> <p>Indigenous and non-Indigenous hunters have different hunting patterns. Although the data used in the EA is accurate for non-Indigenous hunters, this data should be used cautiously when assessing a project that is in an area where there is mostly (if not all) Indigenous hunters for moose and other ungulates.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to provide confirmation that the assumption that moose harvest information used in the Draft EIS is based on the SK database which includes information for hunters in the southern portion of the province and for non- Indigenous peoples. If yes:<ul style="list-style-type: none">o Denison to acknowledge in the Final EIS that the Terrestrial Ecosystem Effects Assessment relied on draw licences to support assessment conclusions and these conclusions do not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. In addition, Denison to note Métis do not participate in the draw system as they are recognized rights holders in the Final EIS.- Denison needs to incorporate Métis Knowledge from the MKS to the Project’s Terrestrial Ecosystems Effects Assessment.- Denison to co-develop and implement a moose-specific monitoring and management plan with the Métis.- Denison needs to include Métis harvesting patterns in the Final EIS (e.g., rabbit, moose, caribou, fox etc.).	Comment #480)	<p>the province and did not include specific harvest information from Indigenous sources as this was not available at the time. The final version of the EIS will provide further clarification as to the source of the moose harvest data, and that specifically it was obtained via the publicly available data regarding draw licenses.</p> <p>With respect to bullet #2 the following is noted. The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.</p> <p>With respect to bullet #3 the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3, is committed to such engagement with respect to monitoring. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.</p> <p>With respect to bullet #4 the following is noted. The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the</p>	final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	toward reaching a resolution on these issues.	on December 1, 2023	a resolution on these issues.

Indigenous Nation, Métis Local, Community, or Organization	Key Topics	Summary of the Issue, Interest, or Concern	Reference	How Comment was Addressed/Considered by Denison	Changes made to Final EIS / Commitment (Mitigation Measure, Monitoring or Other) (or N/A)	Status	Justification of Status	Ongoing Resolution of Concerns (if required)
				MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives (including harvesting) into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The nature of vegetation regeneration on an altered landscape can have continuing effects on woodland caribou. This conclusion is sufficiently vague and assume regeneration will be suitable for woodland caribou.</p> <p>Denison does not provide information on the removal and decommissioning of the roads built for the Project or the extension of the transmission line in the Draft EIS. Linear disturbances like these are incredibly impactful to Métis traditional land use in and around the Project.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to identify how it will be determined that post-decommissioning revegetated habitat will be suitable for woodland caribou including any risk assessments completed to confirm the predictions.- Denison needs to involve MN-S as well as NR1 and NR3 Locals in decommissioning planning, mitigation, and monitoring.- Denison to provide further information on the removal and decommissioning of roads built for the Project and the extension of the transmission line built by SaskPower in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #481)	<p>With respect to bullet #1 the following is noted. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. Consistent with this approach / process, the expectation is that restoration goals will be defined, the activities to be implemented to meet these goals will be defined and performance criteria to confirm that the goals are being / have been reached will also be defined. It is also noted that Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) during discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. As noted at this time the Plan is conceptual in nature but will go hand in hand with, and evolve with the decommissioning plan over time. Since the boreal caribou range plan for SK-1 is under development, it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan at this time is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work with ENV to meet the management objectives and management strategies for the SK1 range.</p> <p>With respect to bullet #2 the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.</p> <p>With respect to bullet #3 the following is noted. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. With the context of the evolution of the decommissioning plan for the site, the plans for removal and decommissioning of roads built for the Project and the transmission line will be developed as part of that process.				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	Changes in the numbers of prey and/or predators during the post-decommissioning period could impact what animals are available for harvesting by the MN- S in the long-term. Recommendations: - Denison needs to clarify and confirm the duration of the habitat changes that may interfere with predator/prey densities including any risk assessments completed to confirm the predictions. - Denison needs to involve MN-S, as well as NR1 and NR3 Locals in decommissioning planning, mitigation, and monitoring.	MN-S Public Comments (March 4, 2023) (Public Comment #482)	<p>With respect to bullet #1 the following is noted. Denison’s decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. Plans for the post-decommissioning phase, including land restoration are at the conceptual stage and will evolve over time. The Project’s Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed and specifics as to what the post-decommissioning landscape will entail and the wildlife it would support as referenced in the review question will be developed. It is also noted that Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) based on discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. The Plan is conceptual in nature but will go hand in hand with, and evolve with the decommissioning plan over time. Since the boreal caribou range plan for SK-1 is under development, it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan at this time is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work with ENV to meet the management objectives and management strategies for the SK1 range.</p> <p>With respect to bullet #2 the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	A wildlife monitoring plan and a Woodland Caribou Management Plan are important tools for managing caribou in the short and long-term. Recommendations: - Denison needs to involve MN-S as well as NR1 and NR3 Locals in the creation of the Woodland Caribou Management Plan, and include the plan in the Final EIS	MN-S Public Comments (March 4, 2023) (Public Comment #483)	Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) based on discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. As noted the Plan is conceptual in nature at this time, largely because of the absence of range plan priorities. Denison is committed to continue to work with ENV to meet the management objectives and management strategies for the SK1 range as the boreal caribou range plan for SK-1 is developed. The Plan is a living document and will evolve over time as more information becomes available. In this regard, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The woodland caribou may not return to the Project area for up to 20 years following post-decommissioning due to available food resources. This may have an impact on long-term harvesting of woodland caribou by the MN-S.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to clarify and confirm the duration of the habitat changes that may interfere with predator/prey densities including any risk assessments completed to confirm the predictions. 	MN-S Public Comments (March 4, 2023) (Public Comment #484)	<p>Denison acknowledges the comment and notes the following. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan.</p> <p>The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat.</p> <p>The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and regulators. As noted above, the boreal caribou range plan for SK-1 is under development and it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work with the province to meet the management objectives and management strategies for the SK1 range.</p> <p>Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes. SK ENV will engage with Indigenous communities and nations as the province develops and refines the range management plan for SK1.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The 5% threshold disturbance is for a viable population which is the SK1 population.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to provide confirmation that the Final EIS appropriately used the Environment Canada threshold values on the woodland caribou population as they relate to the SK1 population. - Denison needs to confirm that the RSA and threshold is suitable in areal extent. See comment 9-001. - Denison needs to commit to re-evaluating their woodland caribou information in the Final EIS. Specifically, to ensure the woodland caribou information used by Denison is in alignment with the SK1 Range Plan being developed by the Province. 	MN-S Public Comments (March 4, 2023) (Public Comment #485)	<p>In terms of the woodland caribou population in SK1, the likelihood of self-sustainability for the Boreal Shield range (SK1) has been updated from “unknown” (EC 2012) to “likely” in the amended recovery strategy (ECCC 2020). The SK1 range comprises more than 18,000,000 ha and is characterized by high fire disturbance and low anthropogenic disturbance (ECCC 2020). For SK1, the amended recovery strategy (ECCC 2020) identifies 40% undisturbed habitat in the range as the disturbance management threshold, which provides a measurable probability (71%) for the local population to be self-sustaining. This threshold is considered a minimum threshold because at 40% undisturbed habitat there remains a risk (29%) that the SK1 local population cannot be self-sustaining. According to ECCC (2020) disturbed habitat is habitat showing: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). In contrast, according to ECCC (2020) undisturbed habitat is habitat not showing any: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). The cumulative effects assessment in the draft EIS showed that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS).</p> <p>Specific to woodland caribou, the draft EIS evaluated and assessed potential Project-related effects on the boreal population of woodland caribou following standard environmental assessment (EA) methodology. The assessment of potential effects considered both direct (i.e., habitat loss) and indirect effects (i.e., habitat alteration) on caribou and their habitat, while assuming that caribou were present year-round and during all of their life stages (i.e., calving, rearing, mating, over wintering). The rationale for the definition of study areas for the purpose of the assessment of the Terrestrial Environment valued components (VCs) is described in Section 9.1.1 of the draft EIS. The Project Area (169 ha or 1.69 km²) and LSA were delineated based on the expected extent of potential direct (footprint) and indirect (sensory disturbance) Project effects; whereas, the RSA considered an 8 km buffer around the Project Area to provide an appropriate spatial scale upon which potential Project effects could be evaluated at the landscape scale where key Terrestrial Environment VCs reside and move within and upon which cumulative effects could be assessed. Boreal caribou occur as one continuous population across the SK1 range (18,034,870 ha), including within the Terrestrial RSA. After consideration, it was decided by Denison and its Subject Matter Experts at EDI Environmental Dynamics Inc. to use the Terrestrial RSA for the cumulative effects assessment for caribou rather than the entire SK1 range. This decision was made largely on the basis that it would not be feasible / appropriate to use a such large area like the SK1 range to assess cumulative effects since consideration of such a large spatial extent would likely "dilute" the contribution of the Project to potential effects at that scale. In support of this decision, comparison of the Project-specific habitat effects (i.e., the Project Area plus a 500 m buffer to account for sensory disturbance) relative to the scale of the SK1 range (as the applicable management unit for portion of the woodland caribou population that uses the Terrestrial RSA) was made. The comparison indicated that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS). As can be seen, the default conclusion at the range scale could only be that the Project does not contribute to cumulative effects at a practical measurable level.</p> <p>Denison and its SMEs believe the EIS took a precautionary or conservative approach to understanding/addressing the likely residual effects (i.e., effects</p>				

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				<p>remaining after mitigation measures were considered) of the Project on caribou and their habitat. This approach provides is appropriate as a planning tool to inform/support future Project-related regulatory approvals processes and to guide the scope and nature of follow-up monitoring. After consideration of measures to avoid and mitigate the potential for effects on caribou and their habitat it was concluded that the likely residual effects of the Project on caribou and their habitat were not significant.</p> <p>While the EIS did not consider specific additional opportunities to offset the non-significant effects, Denison has been working to develop a Conceptual Caribou Mitigation Plan. The plan was submitted to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan and Denison has been in close contact with the Saskatchewan Ministry of Environment (SK ENV), as stewards of woodland caribou from a regulatory perspective.</p> <p>References: Environment and Climate Change Canada (ECCC). 2020. Amended Recovery Strategy for the Woodland Caribou (<i>Rangifer tarandus caribou</i>), Boreal Population, in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada, Ottawa. xiii + 143pp.</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>Previous sections of the Draft EIS identified the development of the Woodland Caribou Management Plan.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to confirm the preparation and inclusion of a Woodland Caribou Management Plan within this section of the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #486)	<p>Denison acknowledges the comment and notes the following. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan.</p> <p>The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat.</p> <p>The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and regulators. As noted above, the boreal caribou range plan for SK-1 is under development and it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan is in part due to the absence of range plan priorities and reflects Denison’s commitment to continue to work</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>with the province to meet the management objectives and management strategies for the SK1 range.</p> <p>Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes. SK ENV will engage with Indigenous communities and nations as the province develops and refines the range management plan for SK1.</p>				
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The EIS states: "The parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings."</p> <p>The correct name is "Métis Nation-Saskatchewan" (no "of").</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to correctly reference Métis Nation- Saskatchewan throughout the Final EIS. - Denison needs to include in the Final EIS input from the Métis Knowledge Study and any changes in the selection of VCs and their characterization. 	MN-S Public Comments (March 4, 2023) (Public Comment #488)	<p>The EIS will be updated throughout to the correct name "Métis Nation-Saskatchewan" (no "of").</p> <p>At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time.</p> <p>A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). Section 11 has been updated to reflect "MN-S."	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>Many of the Project Phase/Activities listed would contribute to a change in the environmental setting for Indigenous land and resource users within the LSA. Interactions should be considered for temporary or longer-lasting aesthetics impact related to Project-related dust, lighting, noise, and visual disturbance.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to revise Table 11.1-7 in the Final EIS to include the addition of interactions and effects analysis for "Perceived suitability of lands and resources therein" that considers Project-related construction and decommission impacts to Indigenous Land and Resource Use. <p>For example, the development of access roads and site preparation during construction, and demolition and disposal of surface infrastructure during decommission, would likely result in some interaction with ILRU related to noise, dust, or traffic.</p>	MN-S Public Comments (March 4, 2023) (Public Comment #489)	Table 11.1-7 will be revisited to include to the development of access roads and site preparation during construction, and demolition and disposal of surface infrastructure during decommission.	Table 11.1-7 has been updated.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>Missing information to support the claim that other large terrestrial mammals, such as elk and white-tailed deer species, are not found in sufficient abundance in the LSA to be assessed as part the Project.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to include additional information in the Final EIS on why large terrestrial mammals that are harvested in the LSA (such 	MN-S Public Comments (March 4, 2023) (Public Comment #490)	Section 11.2.3.1.2 describes how other big game species, such as white-tailed deer or elk, are not hunted in WMZ 75 due to the absence or low abundance of these species.	N/A	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		as elk and white-tailed deer) are not found in sufficient abundance in the LSA to support this conclusion.				resolution on these issues.		
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>The characterization of the EIS does not yet reflect MN-S and NR1 and NR3 Locals values or interests as this has not yet been provided. It is expected that when made available, this information will be reflected in the Final EIS. In the Draft EIS, Denison has proposed to develop mitigation measures and management planning, but has not begun engaging with Métis Community of Interest and MN-S on contents of mitigation measures or management plans.</p> <p>It is good practice for Communities of Interest, including Métis, to have the opportunity to contribute to the scoping, development, and implementation of mitigation measures and management plans (and monitoring programs), including effectiveness reviews and the application of an adaptive management approach.</p> <p>Arrangements and applicable funding for a Métis Knowledge study is underway but not yet incorporated in the assessment.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to include in the Final EIS, information provided by Métis Locals in NR1 and NR3 on their perspectives on other land and resource use.- Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Métis Local #9 on potential Project-related effects to Métis traditional economy throughout the life of the Project.- Denison needs to include in the Final EIS, effects mitigation, and management and monitoring plans that were prepared with MN-S and NR1 and NR3 Locals involvement and agreement.- Denison, in the Final EIS, needs to incorporate the outcome of the Métis Knowledge Study.	MN-S Public Comments (March 4, 2023) (Public Comment #491, #496, #503, #522, #531, #538)	<p>A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.</p> <p>As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). MN-S will be informed throughout the monitoring program design and implementation process (as described in Section 8).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>For many Indigenous communities and governments, cumulative effects analysis requires an assessment that includes pre-development conditions to understand the impacts of past and existing activities that continue to affect the context for environmental and social systems.</p> <p>An evolving best practice during an EA is to consider the fuller context of historic change. This practice is recognized through numerous Canadian cumulative effects assessment initiatives and management frameworks (e.g., Indigenous Centre for Cumulative Effects) and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process).</p>	MN-S Public Comments (March 4, 2023) (Public Comment #493)	Noted.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	The EA assumptions for big game numbers and success are based on the SK database information which includes information for hunters in the southern portion of the province and for non-Indigenous peoples. Reliance on draw licences to support Project models does not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. Métis do not participate in the draw system as they are recognized rights holders.	MN-S Public Comments (March 4, 2023) (Public Comment #494)	Section 9.3.3.1.1 describes how the Project is located in WMZ 75, while WMZ 73, 74, and 76 are adjoining WMZ 75 (Figure 9.3 6). Between 2014 and 2020 (the years for which data are available), no draw licences were sold for any of these WMZ and, therefore, no associated harvest was reported to have occurred in the area based on draw licenses. While this breakdown to WMZ harvest numbers is not available for resident regular licences, it is assumed that most of the annual harvest through resident regular licences occurred in the	Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>Recommendations:</p> <ul style="list-style-type: none"> - Denison to acknowledge in the Final EIS that the Terrestrial Ecosystem Effects Assessment relied on draw licences to support assessment conclusions and these conclusions do not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. In addition, Denison to note Métis do not participate in the draw system as they are recognized rights holders in the Final EIS. - Denison needs to incorporate Métis Knowledge from the MKS to the Project's Terrestrial Ecosystems Effects Assessment. 		<p>southern part of the province.</p> <p>A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.</p>		resolution on these issues.		
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>To characterize trends in wildlife harvesting it would be more appropriate to show a period longer than 1 year; at least 5 years where available.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Following best practices, Denison should include at least 5 years of data in the Final EIS for upland game bird harvest and harvest effort in Game Bird Management. 	MN-S Public Comments (March 4, 2023) (Public Comment #495)	Temporal boundaries for characterizing components of the OLRU existing environment varied by topic. Commercial trapping and fishing data were presented based on the data available from the Province of Saskatchewan, and with multiple years of data presented where available. Other topics such as recreational fishing and hunting considered data where available, but in some instances is based on licensing quotas which do not always vary from year to year, or are based on self-reported outcomes. Specific to game bird harvesting, over 5 years of data is provided on annual grouse harvest (2014 to 2020) in Section 9.4.3, Table 9.4-3.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Current use of lands and resources for traditional purposes; Other	<p>This conclusion is not consistent with the methods detailed on page 5-30 in section 5.8 as the Draft EIS identifies noticeable residual effects related to traffic (increased traffic volume) and noise (low to moderate impact). These effects should be taken to residual effects assessment.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - To be consistent with the methods detailed in section 5.8, Denison should include all noticeable Project-related effects for residual effects assessment. For example, effects were identified related to traffic (increased traffic volume) and noise (low to moderate impact) but were not taken to residual effects assessment for Other Land and Resource Use in the Final EIS. 	MN-S Public Comments (March 4, 2023) (Public Comment #497)	Potential Project disturbances considered under this pathway included increases in traffic, noise, air quality, modification of the wilderness experience, and increases in competition for resources. These disturbances will be most detectable in locations proximal to the Project site. Effects have the most potential to affect cabin leaseholders due to their use of ground travel, hunting and fishing activities, and general proximity to the Project. With the exception of dust which has proven mitigation strategies, the overall disturbances are negligible and there are a limited number of resource users who will experience them to any detectable degree. Therefore, this pathway is not carried forward for residual effects assessment. Section 11.2.5 describes the mitigation measures to reduce the impacts of traffic, noise, and others. Further mitigations for traffic are described in Section 12.3.5 in Section 12 and for noise are described in Section 6.2.5 in Section 6.	Section 11.2.5 describes the mitigation measures to reduce the impacts of traffic, noise, and others. Further mitigations for traffic are described in Section 12.3.5 in Section 12 and for noise are described in Section 6.2.5 in Section 6.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions	Interest was expressed in understanding the number and types of employment that would be created by the Project.	ROC 62	<p>Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Section 13 summarizes local, provincial, and federal Project benefits and Denison's approach to employment, training, and business participation opportunities for communities.</p> <p>Denison has estimated a workforce of 300 people for the two-year Construction</p>	Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				period. Each component of Construction will require workers with different types of skills and training depending on the task (e.g., road construction, wellfield drilling, erection of buildings, connection to services). During Operation, over 180 people are expected to be employed to operate the ISR wellfield and processing plant, as well as provide various supporting activities such as security, camp operations, operation of the water treatment, sewage and potable water plants, environmental monitoring, and maintenance of roads, equipment, and buildings.	elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project.			
Métis Nation – Saskatchewan	Health and socio-economic conditions	Concern with racism and other factors in the workplace affecting employee retention and the need for the understanding of the Métis identity, their culture, and their values.	ROC 62	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. Policies will be adapted to the conditions of the Project and Denison. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions	Questions about radiation and how it would be monitored.	ROC 1 ROC 62	As stated in Section 2.9.1.3.2, A Radiation Protection Program would be designed and implemented so that Denison complies with, or exceeds, the level of radiation safety that is required by the relevant regulations pursuant to the Nuclear Safety and Control Act and Denison's Health and Safety Policy. Activities within the program would include implementing a radiation code of practice, measuring and monitoring radiation on an ongoing basis, and reporting radiation testing results to regulators. As summarized in the Worker Health assessment (Section 10.2.3.2.10) potential residual effects to worker health during Construction and Operation are expected to be negligible given that the predicted radiation doses are less than the annual allowable effective dose of 20 mSv/yr, and radon is predicted to be within the range that is manageable under an RPP.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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Métis Nation – Saskatchewan	Health and socio-economic conditions	<p>Denison’s EIS does not outline where hazardous waste will be taken for proper recycling or disposal.</p> <p>Recommendations:</p> <ul style="list-style-type: none">• Denison needs to share where hazardous waste will be taken for proper recycling and disposal with MN-S, NR1 Locals, and NR3 Locals	MN-S Public Comments (March 4, 2023) (Public Comment #441)	<p>Waste management is described in Section 2.2.4 of the Draft EIS and includes discussion of all waste types that will be generated by Project-related activities. The following is noted in Section 2.2.4 for reference, "Conventional waste, radiologically contaminated waste, and hazardous waste will be managed at the Project. Denison is committed to conducting stringent waste characterization throughout the life of the Project. This includes physical, radiological, and chemical characterization to maintain accurate waste inventories and determine how wastes will be dispositioned through either re-use, recycling, temporary storage, or permanent disposal (on or off site). This includes clearance of material that meets unconditional release requirements and can be safely removed from site.</p> <p>A waste management program will be developed for the Project to support licensing and permitting. The waste management program and associated plans developed to support licensing will be based on the 4 R’s: Reduce, Reuse, Recycle, and Recover, and will detail how each type of waste generated on site will be managed. Resources used to develop the waste management program will include, but are not limited to, the CNSC’s REGDOC-2.11 series, related Canadian Standards Association (CSA) standards, and the Hazardous Substances and Waste Dangerous Goods Regulations (Government of Saskatchewan 2000)."</p> <p>Hazardous waste management in particular discussed in Section 2.2.4.4. of the Draft EIS where the following is noted, "Denison identified a need to have a small (250 m2) pad designated for temporary storage of hazardous waste such as paints, solvents, hydrocarbons, and used oil. The temporary storage pad will have a composite liner system (Figure 2.2 24). Hazardous wastes will be taken off site by waste management service providers for proper recycling as soon as practical."</p> <p>As referenced in the Draft EIS, the specific details related to hazardous waste management will be documented as part of the overall, waste management program that will be developed as the Project advances from the environmental assessment process into licensing and permitting. Hazardous wastes will be managed consistent with regulatory requirements, using licensed third-party waste management/haulage providers and licensed waste management facilities. Denison will inform the MN-S and relevant locals when such documentation has been prepared through engagement mechanisms in place at that time.</p>	Section 2.2 describes how Denison is committed to conducting stringent waste characterization throughout the life of the Project. A waste management program will be developed for the Project to support licensing and permitting. Hazardous wastes will be managed consistent with regulatory requirements, using licensed third-party waste management/haulage providers and licensed waste management facilities. Denison will inform the MN-S and relevant locals when such documentation has been prepared through engagement mechanisms in place at that time.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions	<p>Denison has not identified Métis-specific considerations to their employment and training program.</p> <p>Denison has indicated that there will in-house training, as well. It is not clear how this will be delivered. Denison notes some jobs will require a Grade 12 education in addition to in- house training programs, but does not offer to support Métis peoples obtain Grade 12 education to access available positions.</p> <p>Terminology like “could” is a vague indicator of commitment to developing strategies to address training and support systems for workers. More detail is needed to understand Denison’s approach and commitment to addressing community concerns related to providing appropriate local resources for training and support as</p>	MN-S Public Comments (March 4, 2023) (Public Comment #450, #509, #536)	<p>Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then</p>	Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>access to education and supports systems effects for residents of the LSA.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- MN-S would like confirmation on what kind of education and training support Denison will make available to maximize employment from Communities of Interest.- Denison needs to support Métis training opportunities through Northlands College.- MN-S would like additional details on which roles will need Grade 12, and how many roles are available for people without Grade 12.- Denison needs to provide more detail within the Final EIS related to their role in developing and providing culturally appropriate resources for training, education and supports systems as access has already been identified as a barrier to local communities.- Denison needs to support Métis training opportunities through Northlands College.- Denison needs to provide more certainty and detail within the Final EIS related to local training and employment. More detail within the Final EIS related to Denison’s role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities. This includes training programs prepared with MN-S/NR1 and NR3 Locals involvement and agreement.- More information is needed to understand Denison’s approach and commitment to addressing effects to local employment especially as it relates to Foundational positions and why a Grade 12 education is required.-Denison needs to update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA.- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to discuss employment and training opportunities for Métis (e.g., discussing Métis-specific recruitment strategies). Opportunities to discuss include (but are not limited to): hiring and training practices during all phases of the Project, on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs.		<p>beyond the RSA.</p> <p>All positions at the Project will require a Grade 12 education or equivalent. Section 13.3.2.1 describes how foundational positions (i.e. entry level) require Grade 12 education and in-house training programs, although a combination of skills and experience may be considered. These positions would include process plant operators, site services, drillers, and catering/janitorial staff.</p> <p>Denison will update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA.</p> <p>Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.</p>	<p>Project (described in Section 13). Section 13 was updated to reflect the 2021 Census. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 as described in Section 4.</p>			
Métis Nation – Saskatchewan	Health and socio-economic conditions	<p>Denison does not specify the goods and services during Construction, Operation, and Decommissioning. MN-S is interested in sharing potential goods and services opportunities for Métis peoples (e.g., chefs and artisans). Denison has not specified how it is transmitting knowledge nor provided an explanation of the procurement approach.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to provide specific information on the goods and	MN-S Public Comments (March 4, 2023) (Public Comment #451)	<p>Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan. This procurement approach may consider advance sharing of purchasing requirements of goods and services throughout all phases of the Project, efforts to increase the capacity and capabilities of businesses to</p>	<p>Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking</p>	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		services opportunity available to Métis as per labour force and business analysis. - Denison needs to clarify how it has made MN-S, NR1, and NR3 Locals aware of the procurement approach and opportunities, and how it will keep them informed through the life of the Project.		increase successful bidding outcomes, and the development of a business registry.	elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan (as describe in Section 13).			
Métis Nation – Saskatchewan	Health and socio-economic conditions	No Emergency Preparedness and Response Program was available for review. Recommendations: - Denison needs to include an Emergency Preparedness and Response Program in the Final EIS for review. - Denison to include information on transportation accidents within the Emergency Preparedness and Response Program.	MN-S Public Comments (March 4, 2023) (Public Comment #453)	<p>With respect to Part i) of the comment the following is noted. The MN-S review comments accurately indicates that a draft Emergency Preparedness and Response Program was not included in the EIS submission; rather, Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP). The EPRP would be established to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. A such, the documentation referenced in the MN-S review comment will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S, and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate.</p> <p>With respect to Part ii) of the comment the following is noted. The EPRP will include information relevant to transportation accidents and responses thereof. Further, information regarding aspects of emergency response with respect to transportation accidents was provided in the draft EIS and direction to that information is highlighted as follows for reference. Postulated traffic accident scenarios were considered in the Accidents and Malfunctions Technical Supporting Document (TSD; Appendix 14-A) as summarized in Section 14 of the draft EIS. As mitigation for such scenarios the accidents and malfunctions assessment highlighted commitments to develop the EPRP and several plan and procedure level documents (e.g., spill response plan; an emergency response plan; a traffic and transportation plan; a travel management plan; personnel training procedures). Additionally, Section 12.3 of the draft EIS discusses mitigation measures that will be implemented to reduce adverse traffic effects, as well as mitigation measures to be implemented to reduce adverse effects on emergency services capacity such as:</p> <ul style="list-style-type: none">• All drivers serving the Project will receive appropriate training related to the nature of materials being transported, including driver training to the highest standards based on the transportation of nuclear substances.• Vehicles transporting dangerous goods and/or hazardous products will display required placards and labels in accordance with provincial legislation and will follow designated highway corridors.• All materials transported by truck will be compliant with any weight restrictions or permits, spring road restrictions, or geometric constraints set out by the Saskatchewan MOHI.	Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<ul style="list-style-type: none">• Denison will maintain Project roads and the main access road to the site. First aid facilities will be supplied during construction.• A primary care paramedic will be contracted to provide care on site through all phases of the Project. Denison will provide the appropriate amount of First Aid and CPR training to make sure employees have adequate coverage.• Mandatory safety orientations will be held for contractors and workers.• First aid personnel will provide transport to a hospital by air when required or by Saskatchewan’s air ambulances;• Health and safety management programs will be developed for Construction, Operation, and Decommissioning.• Workers will be trained in fuel handling, equipment maintenance, and fire prevention and response measures.• Denison’s Environment, Health, Safety, and Sustainability Policy will be enforced.• Continued liaison with LSA communities and relevant authorities (e.g., RCMP, health and service providers) will be undertaken to provide updates, discuss any Project-related concerns, and make sure that the required resources are in place.• Project-specific contingency, emergency response, and spill prevention plans will be developed to reduce the likelihood and severity of accidents and potential fires.• Based on the outcomes of discussions with COI, Denison may provide support and/or training to local emergency services to make sure that staff are adequately prepared in the unlikely event of an accident, malfunction, or spill on Highways 914 or 165. This may include the provision of specialty materials or equipment to deal with an emergency response.				
Métis Nation – Saskatchewan	Health and socio-economic conditions	<p>The safety of all Métis peoples that will be engaged or employed by the Project is of utmost importance. Racism towards Métis peoples will not be tolerated. Denison’s policies need to support a safe work culture for all.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to share all policies related to creating a safe workplace with MN-S, NR1 Locals, and NR3 Locals for review and comment (e.g., health and safety policies and the Workplace Violence & Harassment Policy).- Denison needs to create a culturally safe workplace for Métis peoples.- Denison needs to clarify its policies to prevent incidents of workplace violence and harassment and identify clear actions to address potential incidents of workplace violence and harassment.- Denison needs to mandate cultural awareness training for all employees to help with one the Project’s established principles: “approaching sustainability and engagement activities with the utmost respect for Indigenous communities, Indigenous Rights, and Indigenous Knowledge”.	MN-S Public Comments (March 4, 2023) (Public Comment #460)	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison welcomes specific feedback on Métis interests and concerns. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions	Interactions with the Human Environment Valued Components should be consistent with interaction table in related technical VC assessment sections. Comments have been made for revision to	MN-S Public Comments (March 4,	Acknowledged. Table 5.6-2, Summary Interaction Matrix for Valued Components in the Human Environment, will be cross-checked against the VC interactions tables related to the biophysical environment and updated for	Table 5.6-2 has been updated.	Ongoing - Denison is committed to	Response to MN-S comments	Discussions continue with MN-S about

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		some of the interaction table in related VCs. Recommendations: - Denison needs to update Table 5.6-2 be to be consistent with revised interaction tables for related VCs.	2023) (Public Comment #465)	consistency in the final EIS, and in consideration of the comments provided by the reviewer on the individual biophysical environment VC interaction tables as noted.		working toward reaching a resolution on these issues.	were provided on December 1, 2023	working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>The interaction table (12.2-5) identifies “Employment and Expenditures” as the only project component that would influence community well-being. This is inconsistent with previous interactions tables and information in the Draft EIS that identified potential interactions with the physical components and activities of the project that could affect aspects of community identity and cohesion (e.g., section 12.1 Cultural Expression). Comments were raised in the Draft EIS that community health and well- being is related to the relationship with the environment including issues such as changes in water quality or quantity, and mental health being affected by industrial development.</p> <p>Furthermore, section 12.2.3.3 (p. 12-66 to 12-73) identifies the natural environment as a component of community cohesion. This should be better reflected in the analysis of Community Well-being.</p> <p>Recommendations: - In the Final EIS, Table 12.2-5: Potential Project Interactions for Community Well-being (p. 12-74 to 12-77) should include the addition of interactions and effects analysis for “Change in Community Cohesion” that considers Project- related construction, operations, and decommission impacts to mental, physical, and cultural health that stem from a relationship with the environment.</p> <p>This analysis does not address the concerns expressed in the existing conditions reporting (section 12.2.3, p. 12-47 to 12-50) related to mental and physical health being affected by quality of water and land is being affected by industrial developments. This should be better reflected in the analysis of Community Cohesion.</p> <p>Recommendations: - Denison needs to provide additional effects analysis of “Change in Community Cohesion” that considers Project- related construction, operations, and decommission impacts to mental, physical, and cultural health that stem from a relationship with the environment. For example, concerns were expressed in the Draft EIS reporting (section 12.2.3) related to mental and physical health being affected by quality of water and land is being affected by industrial developments.</p>	MN-S Public Comments (March 4, 2023) (Public Comment #504, #514)	Denison acknowledges that there is an interrelationship between the two and for the purposes of the EIS ha been organized into separate sections. Section 11.1 provides an assessment on perceived suitability of lands and resources therein, along with human health. See Section 11.1.4, 11.1.5, and 11.1.6 for further information.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	The EIS states: “Best efforts will be made to make sure employment is maximized, including within the LSA communities and to encourage business participation within the LSA.” (p. 12-80) “Best efforts will be made . . .” is a vague statement about project-related plans to maximize local training, employment, and procurement opportunities that would beneficially impact income levels for residents. More detail is needed to understand Denison's	MN-S Public Comments (March 4, 2023) (Public Comment #506, #507)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. Spatial boundaries for the Economy VC were selected to reflect the geographic	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>approach and commitment to increased personal income for residents of the LSA.</p> <p>“Community concerns” are identified related to broader spatial (having to move away to work) and temporal (“crash” after project) uncertainty for increased income. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to income for residents of the LSA.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation as well as supports for employee retention. More information is needed to understand Denison's approach and commitment to increased personal income for residents of the LSA- Denison to expand the LSA communities to include all potentially impacted NR1 and NR3 Locals.- Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation as well as supports for employee retention. <p>More information is needed to understand Denison's approach and commitment to addressing community concerns related to increased personal income for residents of the LSA.</p> <ul style="list-style-type: none">- Decommissioning planning needs to consider employment transition in addition to site clean-up to avoid boom and bust scenarios.		<p>areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. The LSA for the assessment of the economy includes ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Pinehouse Lake, and Beauval. The RSA for the Economy VC is the Northern Saskatchewan Administrative District (Census Division 18), which is defined in The Northern Municipalities Act, 2010 (Government of Saskatchewan 2010). This area shares many economic and demographic characteristics with the LSA and is a relevant reference point.</p> <p>Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.</p> <p>Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan. This procurement approach may consider advance sharing of purchasing requirements of goods and services throughout all phases of the Project, efforts to increase the capacity and capabilities of businesses to increase successful bidding outcomes, and the development of a business registry.</p>	<p>communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project (as described in Section 13).</p>	<p>resolution on these issues.</p>		
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>“Community concerns” are identified related to impact to family and community cohesion due to working away from home for long periods. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to community and family cohesion effects for residents of the LSA.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to provide more detail within the Final EIS related to worker rotation system mitigation. Particularly considering the identification of reported difficulty in balancing the demands of a worker rotation system with domestic commitments, and many local community members concern of being unable to achieve a work-life balance.	MN-S Public Comments (March 4, 2023) (Public Comment #508)	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.</p> <p>Denison recognizes that both parents and members of the community/family could potentially be employed by the Project. Mitigation measures associated with potential effects to community cohesion and the commuter-rotation system are described in Section 12.1.5 and include:</p> <ul style="list-style-type: none">- Working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities, where practicable;- Implementation of Denison's Indigenous Peoples Policy and advancement of	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>Response to MN-S comments were provided on December 1, 2023</p>	<p>Discussions continue with MN-S about working toward a resolution on these issues.</p>

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				<p>reconciliation</p> <p>- Using a commuter rotation system has also shown to be effective in allowing Indigenous employees continued opportunities to spend time on the land, and important factor in the transmission of knowledge and language (see Section 11 for a description of potential effects to land use).</p> <p>As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>	informed throughout the monitoring program design and implementation process.			
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>This statement is vague about who will monitor community cohesion and whether Government departments and private- sector companies are committed to provide those services for the life of the Project. It also ignores previous statements in the Draft EIS that identify direct and indirect effects of uncertainty related to changes to community well-being that would be related to the Project. Denison's earlier statements indicate that monitoring and follow-up will be an aspect of mitigation. The statements seem contradictory. Recommendations:</p> <ul style="list-style-type: none"> - Denison, in the Final EIS, needs to demonstrate that whether Government departments and private-sector companies are committed to provide community cohesion- related services for the life of the Project. - Denison needs to distinguish and clarify earlier statements of monitoring and follow- up with the assertion here. 	MN-S Public Comments (March 4, 2023) (Public Comment #516)	<p>Denison is committed to implementing measures within its control and responsibilities (for example the EFAP and other measures). As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p> <p>Monitoring of community cohesion at the community level is something Denison understands is for the Government to consider.</p>	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>The 31% or 51% increase in truck traffic on Highway 914 seems to represent a more than slight increase in traffic volume. It is acknowledged that this is related to 18 additional trucks per day. Clarification is required to determine if there would be a similar % increase in potential collisions. Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to clarify and provide analysis of the impact of traffic volume and what is a suitable threshold. 	MN-S Public Comments (March 4, 2023) (Public Comment #518)	Denison believes it has fulfilled its information requirements for the EIS and supporting documentation as outlined in the EA guidance provided by the province and federal government. Notwithstanding that, Denison recognizes that further information will be required as the project moves through the EA and licensing / permitting processes. Denison will work with the province to identify and scope additional information requirements.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>Clarity is required to explain why collisions can not be predicted with accuracy given the availability of existing predictive modelling for traffic management planning. Recommendations:</p> <ul style="list-style-type: none"> - Denison should provide further clarification in the Final EIS of why collisions can not be predicted with accuracy given the availability of existing predictive modelling for traffic management planning. 	MN-S Public Comments (March 4, 2023) (Public Comment #519)	To clarify, the text in Section 12.3.4.2.1. should have more specifically referenced accident rates as part of the discussion of an increase in the number of collisions due to the Project. Overall, it is expected that accident rates will not be affected by the incremental increase in traffic associated with the Project. Traffic volume is a poor predictor of accident rates on relatively well traveled roads - that is, the accident rate does not show a direct relationship with traffic volume and is relatively consistent in this case. Extrapolating existing accident	N/A	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>rates and specifically applying them to the Projects related traffic would can provide some insight but it is understood that such extrapolation would be very conservative and overestimate the actual level of risk. Accident statistics are inclusive of all manner of accidents, the majority if which are single vehicle accidents that do not result in significant harm to people or property. Moreover, it would be expected that the likelihood of Project-related traffic accidents would occur at lower rates than those attributed to the general public based on the mitigations described in the draft EIS (Section 12.3.5) including: all drivers serving the Project will receive appropriate training related to the nature of materials being transported, including driver training to the highest standards based on the transportation of nuclear substances; vehicles transporting dangerous goods and/or hazardous products will display required placards and labels in accordance with provincial legislation and will follow designated highway corridors; an Emergency Response Plan will be developed in case there is a spill during the transportation of dangerous goods and/or hazardous products; and all, materials transported by truck will be compliant with any weight restrictions or permits, spring road restrictions, or geometric constraints set out by the Saskatchewan MOHI.</p> <p>The above notwithstanding, Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward and as the Program / Plan / Procedure documentation is developed during licensing since elements of this documentation directly align with management of the aforementioned concerns (e.g., emergency response planning, transportation management planning).</p>		resolution on these issues.		
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Clarification is required to explain how Denison intends to provide employee maintenance support services that address the indirect effect to the community members (e.g., childcare, etc.) identified in this statement. Recommendations: - Denison to provide in the Final EIS additional detail on commitments to support employee families while on rotation.	MN-S Public Comments (March 4, 2023) (Public Comment #520)	Section 12.3.5 describes the mitigation measures applicable to community infrastructure and services within the LSA communities, the following mitigation measures will be implemented to reduce adverse effects: (1) Services and programs will be provided on-site and will be accessible to workers. These services and programs may alleviate pressures on social and health services within LSA communities. (2) An EFAP will be part of each worker’s benefits package and will provide supports to individuals and their families that may not be readily available in the communities. Employee and family assistance programs typically provide free assessments, short-term counselling, referrals, and follow-ups to employees and their family members who are having personal or work-related problems. Generally, EFAPs can be accessed remotely by workers and their immediate family. Denison will aim to educate their staff on the offerings of their EFAPs, as well as making that information shareable with individuals’ families.	Section 12.3.5 describes the mitigation measures applicable to community infrastructure and services within the LSA communities.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Most of the mitigations provided are standard worker health and safety and materials handling measures required for worker and environmental safety and don’t address potential effects to traffic within the LSA. Detail is required to demonstrate how measures will address potential hazards from increased traffic volumes, and potential risk for conflict between road users and mining traffic. Recommendations:	MN-S Public Comments (March 4, 2023) (Public Comment #524)	Denison believes the mitigations it has outlined for transportation management (and associated risks thereof) as detailed in the draft EIS (Section 12.3.5, Section 14, Appendix 14-A) are reasonable and practical measures it can take to manage it's Project activities. It is acknowledged that the information provided in the EIS and its supporting documentation is presented at a planning level; however, this level of detail is appropriate at this stage of Project development. Further details as to how these mitigations will be implemented will be	See mitigations in Section 12.3.5	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		<ul style="list-style-type: none">- Denison needs to provide additional information in the Final EIS on how the mitigation will alleviate traffic related impacts.- Denison needs to engage all potentially impacted Métis, including: MN-S, NR1 Locals, and NR3 Locals, in addition to Kineepik Métis Local #9, as an Indigenous Community of Interest throughout the life of the Project.- Denison needs to revise their Indigenous Community of Interest definition in the Final EIS to reflect the uniqueness of Métis governance structures. Specifically, a definition that recognizes Métis Locals proximate to the Project, MN-S, and MN-S regional leadership.- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals, to understand their preferred level of involvement throughout the life of the Project.- Denison needs to acknowledge MN-S, NR1 Locals, and NR3 Locals as an Indigenous Community of Interest in the Final EIS.- Denison needs to revise the Final EIS Executive Summary to note that the Project falls within the Homeland of MN-S, NR1 Locals, and NR3 Locals. Denison needs to apply this change throughout the EIS, where applicable.- Denison to acknowledge that lease review data is not an appropriate way to determine Métis traditional resource use in and around the Project in the Final EIS.		developed during the licensing / permitting phase and will be available for review at that time, rather than as part of the final EIS. Further to this, and as noted elsewhere, Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward and as the Program / Plan / Procedure documentation is developed during licensing since elements of this documentation directly align with management of the aforementioned concerns (e.g., emergency response planning, transportation management planning). Mitigations in Section 12.3.5 also require Denison truck traffic to slow to 40 km/hr for a minimum of 2.5 km on either side of the culture camp(s) in which are understood to occur in September and October (dates may be adjusted at the communities' direction). Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to mitigation measures and monitoring plans.		resolution on these issues.		
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>This section of the draft EIS states: "Residents in the LSA and Regional Study Area (RSA) have expressed interest and concern about the Project's effect on the local economy, through income, training and employment opportunities, and business opportunities. Denison has not sufficiently engaged MN-S, NR1 communities, and NR3 communities on the assessment of the Economics VC. Initial direction and input into VC selection was obtained from:</p> <ul style="list-style-type: none">• discussions with Indigenous and non-Indigenous Communities of Interest (COI);• discussions with LK holders;• discussions with government agencies and the public;• results of Denison's baseline studies;• regional data from other EAs;• results from engagement and consultation activity; and• similar or recent projects in the region." (p. 13-5 to 13-6) <p>Recommendations:</p> <ul style="list-style-type: none">• In the Final EIS, Denison needs to include the input from MN-S, NR1 Locals, NR3 Locals and indicate if VCs were altered.• Denison needs to meet with MN-S, NR1 Locals, and NR3 Locals to discuss Project- related economic issues and interests.• MN-S request additional detail is included within the Final EIS, on how the input provided by MN-S, NR1 Locals, and NR3 Locals will influence the assessment of the Economics VC.	MN-S Public Comments (March 4, 2023) (Public Comment #525, #528)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Denison does not include MN-S or NR1 communities within the LSA in the assessment on the economy and therefore employment, training, and business opportunities will not be prioritized for all potentially impacted Métis. Potential Project interactions for the Economy VC do not reflect feedback shared by MN-S/NR1 and NR3 Locals. Denison has not assessed the participation rate, employment rate, or unemployment rate of MN-S or NR1 and NR3 communities. Recommendations: - Denison to include MN-S and all NR1 communities in the LSA for the economy VC in the Final EIS. - Denison needs to discuss potential Project interactions for economy to Métis peoples and update Table 13.3-1 to reflect feedback shared by MN-S/NR1 and NR3 Locals. - In the Final EIS, Denison needs to expand the description of the existing environment to include NR1 communities and NR3 communities.	MN-S Public Comments (March 4, 2023) (Public Comment #529, #533, #534)	Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	The Draft EIS does not yet include Métis Knowledge from NR1 and NR 3 other than Kineepik. The Draft EIS does not include information on how Denison intends to include the outcome of the Métis Knowledge Study. Perspectives on cumulative impacts have only been considered for English River First Nation and Kineepik Métis. This has resulted in an absence of MN-S perspective regarding cumulative impacts within the Project and surrounding areas. Recommendations: - Denison needs to provide a clear indication of how the MKS findings were included in the Final EIS (e.g., effects analysis, cumulative effects analysis, mitigation measures, etc.) including confirming use with MN-S. - The Assessment should not be considered complete until the Métis Knowledge Study is finished and factored in.	MN-S Public Comments (March 4, 2023) (Public Comment #454)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLRO are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes	Details are not provided regarding how these programs and plans will be developed and implemented, or how they will integrate the needs of all the Indigenous and Métis communities. Recommendations: - Denison needs to clarify whether discrepancies will only be addressed by follow-up and monitoring. - Denison needs to involve MN-S, NR1 and NR3 in determining other means for examining divergences and informing follow-up and monitoring (e.g., collaborative field studies). - Denison needs to include in the Final EIS, management and monitoring plans that were prepared with MN-S and NR1 and NR3 Locals involvement and agreement. - Denison needs to include in the Final EIS, health risk assessment management and monitoring plans that are prepared with MN-S involvement and agreement to address suitability of land and resources for Indigenous land users. - Denison should confirm this assertion through a monitoring	MN-S Public Comments (March 4, 2023) (Public Comment #455, #492, #501, #510, #511, #521, #523, #527)	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the	MN-S will be informed throughout the monitoring program design and implementation process.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>program that will focus on providing data to verify the predictions and include communication planning to convey health risk assessment results. This may also address assumptions about perceived suitability of lands and resources.</p> <ul style="list-style-type: none">- Denison needs to provide more detail within the Final EIS related to the health and wellness programs and their role in developing and providing resources of this type. This should include the provision of services more broadly within communities, not just to individuals on-site.- Denison to confirm how Métis input is considered in mitigation development.- Denison needs to provide more detail within the Final EIS related to a commitment to developing and key components of life skills programs. It is appropriate to address the issues as they are identified as an effect of the project in the proceeding section regardless of the certainty of these effects.- Denison should clarify their commitment to providing provide community social services to the families of local employees to address issue identified in relation to the shift rotation (e.g., childcare services)- Denison to provide additional information of on-site health services that will alleviate community-based health services in NR1 and NR3.- Denison needs to confirm how social responsibility guidelines will support community infrastructure and services in NR1 and NR3 to help offset some of the interactions and effects to local communities and timelines for the action.- MN-S requests that in the Final EIS, Denison include the addition of interactions and effects analysis for Post- Decommissioning impacts to economics that may stem from Employment Income within the LSA communities related to monitoring and the implementation of management programs to respond adaptively to potential effects of the Project. This includes monitoring and management programs prepared with MN-S, NR1 Locals, and NR3 Locals involvement and agreement.		<p>LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.</p>				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes;	<p>Denison did not engage MN-S on potential Project-related effects to Métis traditional use activities such as (but not limited to): hunting, trapping, and fishing. No Métis Knowledge was used to inform the Project’s spatial boundaries.</p> <p>Denison has not engaged MN-S to understand Métis knowledge to inform the development of the Project’s environmental monitoring and management plans (e.g., Caribou Management Plan). This applies to monitoring air emissions, noise monitoring, geology, groundwater quantity and quality, surface water quality, sediment quality, fish and fish habitat and human health. Information to be gathered during the Métis Knowledge Study will contribute to the development of these plans.</p> <p>Denison does not acknowledge MN-S, NR1, or NR3 involvement in</p>	<p>MN-S Public Comments (March 4, 2023) (Public Comment #445, #448, #457, #498, #502, #505, #512, #513, #515, #526, #543, #545, #548)</p>	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations.</p> <p>A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.</p>	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 as described in Section 4. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). MN-S will be informed throughout the monitoring program design and implementation process. Section 12.2.4.2.1 describes that</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>Response to MN-S comments were provided on December 1, 2023</p>	<p>Discussions continue with MN-S about working toward a resolution on these issues.</p>

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		<p>the design and implementation of the post-decommissioning monitoring program.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to incorporate Métis Knowledge from the MKS into their discipline- specific effects assessment, the Final EIS, and all monitoring and management plans for the Project, where applicable.- Denison needs to engage MN-S to determine the appropriate funding, process, and timeline to conduct the MKS.- MN-S would like the opportunity to review applicable Project management documents that provide information that is relative to the potential impacts of the Project on traditional land use activities, these include, but are not limited to the following: Preliminary Decommissioning Plan, Status of the Environment reports, Environmental Effects Monitoring reports, annual reports, updated environmental risk assessments and the Final Decommissioning.- Denison needs to provide plain language summaries, posters/handouts, and presentations on monitoring and effects management plans and programs to MN-S, NR1 Locals, and NR3 Locals. Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment.- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to better understand how they would like to be informed of monitoring results (e.g., 1-page plain language summaries, annual monitoring report, community meetings etc.).- Denison needs to revise its understanding of Métis, Métis governance and the differences between MN-S and Métis Locals.- Denison needs to include MN-S, NR1 Locals, and NR3 Locals as Communities of Interest, or explain why they limited their selection of Métis communities in their listing.- Denison needs to include in the Final EIS, information provided by Métis Locals in NR1 and NR3 on their input related to cultural expression.- The Final EIS should include detail on how the input provided by Métis Locals in NR1 and NR3 and MN-S will influence the development of the location of pick-up points and commuter transportation options and address concerns related to in-migration and out-migration pressures.- Denison needs to provide additional detail within the Final EIS related to Denison’s commitment to developing mitigations that address potential effects to community well-being such as support for community accessible health and wellness programs, community liaisons, community readiness programs, and long-term monitoring opportunities. This includes mitigations that are prepared with MN-S, and NR1 and NR3 Locals involvement and agreement.- Considering the uncertainty identified in the Draft EIS about social		<p>Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply.</p> <p>As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.</p>	<p>multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply.</p> <p>MN-S will be informed throughout the monitoring program design and implementation process (as described in Section 8)</p>			

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		effects of the Project on community cohesion, Denison needs to provide additional detail within the Final EIS related to Denison's commitment to developing monitoring and management programs to understand and respond adaptively to potential effects of the Project on community cohesion. This includes monitoring and management programs prepared with MN-S, and NR1 and NR3 Locals involvement and agreement that could support community members dealing with use of alcohol/substances and/or related violence and crime.						
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	As identified in section 11.1.6 (p. 11-66 to 11-68), Indigenous land use may be affected by the Project despite mitigations. It is reported that Project-related effects such as noise and dust can cause avoidance of the area by some resource harvesters while others may be undeterred. Denison acknowledges that several barriers to employment in northern Saskatchewan exist without providing solutions to address and/or mitigate such barriers. Recommendations: - Denison needs to include in the Final EIS, information provided by Métis in NR1 and NR3 once the MKS is completed. - Denison needs to support Métis training opportunities through Northlands College. - Denison needs to provide more detail within the Final EIS related to their role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities.	MN-S Public Comments (March 4, 2023) (Public Comment #530, #541)	Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project - such as on the job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions, including Northlands College, to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area. A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	Need some clarification on this statement as it's reasonable to assume that both parents (mother and father), aunts' and uncles, and other relatives who are members of the community/family would potentially be employed and be away from home. Transmission of knowledge has the potential to be disturbed if multiple family and community members are away on working rotation. Recommendations: - Denison needs to provide clarity in the Final EIS on the statement that "knowledge transmission is likely to continue because the entire family and community are involved" considering the potential that with local hiring practices in place, multiple family and community members may be away on working rotation and not able to adequately facilitate knowledge transfer.	MN-S Public Comments (March 4, 2023) (Public Comment #499)	Denison acknowledges that both parents (mother and father), aunts' and uncles, and other relatives who are members of the community/family could potentially be employed by the Project. Mitigation measures associated with potential effects to cultural continuity and the commuter-rotation system are described in Section 12.1.5 and include: - Working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities, where practicable; - Implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation - Using a commuter rotation system has also shown to be effective in allowing Indigenous employees continued opportunities to spend time on the land, and important factor in the transmission of knowledge and language (see Section 11 for a description of potential effects to land use). Denison remains committed to maintain positive working relationships with all Indigenous COIs and will be open to discussion on any issues or concerns that arise.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Current use of lands and resources for traditional purposes; Other	The Draft EIS points to follow-up programs as a way to address any uncertainties identified during the EA process. Insufficient detail is provided to reflect how avoidance of areas near the Project may occur; monitoring (and adaptive management) is needed. More clarity on how monitoring will be developed (in section 12.1.8, p. 12-34) to address this uncertainty. Recommendations: - Denison needs to provide more detail in the Final EIS on monitoring (and adaptive management) for areas of uncertainty such as displacement of cultural activities. This includes management and monitoring plans that were prepared with MN-S involvement and agreement.	MN-S Public Comments (March 4, 2023) (Public Comment #500)	<p>Changes to knowledge transmission as described in Section 12.1.4.2.1 stem from two factors: changes to Indigenous Land and Resource Use, and individual participation in the commuter rotation system - both of which have the potential to affect the ways in which individuals spend time participating in cultural activities. Although there is some uncertainty as to the extent to which individuals will continue to participate in activities that support knowledge transmission, experience from other uranium operations in northern Saskatchewan, the shared and communal nature of cultural expression (i.e., occurs within entire extended families and communities) combined with the Project's minimal effects to land and resource use are not expected to alter the ways in which cultural expression currently occurs (or might vary under regular circumstances). As such, no specific monitoring related to changes to cultural expression are planned.</p> <p>Denison acknowledges the concern raised regarding cultural activities related to working at an industrial operation. Mitigation measures associated with potential effects to cultural continuity (including knowledge transfer and language) are described in Section 12.1.5 and include: - working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities; and - implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation;</p> <p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring. Denison remains committed to maintaining positing relationships with Indigenous communities and will be open to discussion on any issues or concerns that arise over the course of the Project.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Initiating efforts with LSA communities excludes most of the Métis communities and keeps them from benefiting. "Economic leakage (i.e., money leaving the local economy) is a relevant concern, particularly for small, concentrated economies. Economic leakage can occur at various points through the cascade of spending in an economy, but the closer that leakage occurs to the point source of investment, the more potential economic benefit that is lost."	MN-S Public Comments (March 4, 2023) (Public Comment #532, #537, #542)	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an	Section 13.4 Mitigation and Enhancement Measures also provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		<p>Recommendations:</p> <ul style="list-style-type: none"> - The Final EIS needs to include additional evaluation of non- LSA communities potential for income benefits. - Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation to manage for and reduce ‘economic leakage’. - It is unclear from the description of Mitigation and Enhancement Measures whether Impact and Benefit Agreements (IBAs) will be included. Impact and Benefit Agreements are a normal vehicle for extending economic benefits to Indigenous communities. - In the Final EIS, confirm whether IBAs are also a mitigation and enhancement measure. 		<p>internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Section 13.4 Mitigation and Enhancement Measures also provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.</p>	<p>Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project.</p>	<p>resolution on these issues.</p>		
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>Denison has not included MN-S or NR1 and NR3 Métis communities in the LSA for the assessment of the economy. Denison also has not engaged MN-S or all potentially impacted NR1 and NR3 communities to understand Métis concerns and/or interests related to employment and training opportunities.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Métis Local #9 on interests and concerns related to employment and training opportunities throughout the life of the Project. - Denison needs to provide more detail within the Final EIS related to their role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities. This includes training programs prepared with MN-S/NR1 and NR3 Locals involvement and agreement. 	MN-S Public Comments (March 4, 2023) (Public Comment #535)	<p>Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.</p> <p>Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project - such as on the job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.</p>	<p>Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>Response to MN-S comments were provided on December 1, 2023</p>	<p>Discussions continue with MN-S about working toward a resolution on these issues.</p>
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	<p>Denison has not included details on closure planning including traditional economic activities that can be expected upon decommissioning.</p> <p>Recommendations: In the Final EIS, Denison needs to provide additional information on closure planning and what traditional economic activities can be expected upon decommissioning.</p>	MN-S Public Comments (March 4, 2023) (Public Comment #539)	<p>The draft EIS includes the Project's Conceptual Decommissioning Plan (CDP) (see Section 2.2.3). As the name implies the decommissioning plan for the site is presented at a relatively high level commensurate with the stage of Project development, including consideration of physical decommissioning activities and reclamation (or restoration) activities. With specific reference to reclamation / restoration the draft EIS notes that disturbed areas would be returned to become a self-sustaining and viable wildlife habitat, but little further detail is provided at this early stage. That detail will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes</p>	<p>Denison is committed to continued engagement with the MN-S at their direction, inclusive of engagement in NR1 and NR3.</p>	<p>Ongoing - Denison is committed to working toward reaching a resolution on these issues.</p>	<p>Response to MN-S comments were provided on December 1, 2023</p>	<p>Discussions continue with MN-S about working toward a resolution on these issues.</p>

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				more specific and granular it is expected that the design basis will become more detailed. Denison noted the MN-S interest in how traditional economic activities can be integrated into the decommissioning plan and such considerations can be made as the plan evolves. Denison is committed to continued engagement with the MN-S at their direction, inclusive of engagement in NR1 and NR3, and within that context expects that integration of traditional economic activities within the context of site decommissioning will be part of those discussions.				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Denison has not engaged MN-S, NR1, and NR3 to understand Métis-specific effects of the Project’s proposed commuter-rotation schedule. Recommendations: (1) In the Final EIS, Denison needs to provide more detail related to worker rotation system mitigation. Particularly considering the identification of reported difficulty in balancing the demands of a worker rotation system with traditional economy activities.	MN-S Public Comments (March 4, 2023) (Public Comment #540)	Denison acknowledges the concern raised regarding participation in the traditional economy related to working at an industrial operation. Participation in the worker rotation system would present similar challenges as those described in the Métis Knowledge Study Report which describes how people's ability to go out on the land is challenged by work schedules generally and the busyness of the modern world. Mitigation offered for other VCs would equally apply to an individual's ability to continue to participate in culturally important activities, such as: - working with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities; and - implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation; Other uranium operations in northern Saskatchewan have show that using a commuter rotation system has been effective in allowing Indigenous employees continued opportunities to spend time on the land, which similarly supports the traditional economy. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3, and within that context expects that the concerns raised by the review comment will be part of those discussions.	Mitigations are described in Section 12 and 13.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Denison has not identified mitigation and enhancement measures to support their conclusion that employment and training residual effects are expected to be low to moderate in magnitude. Recommendations: (1) Denison needs to expand its description of mitigation and enhancement measures to better support their conclusion that employment and training residual effects that are low to moderate in magnitude in Section 13.5.	MN-S Public Comments (March 4, 2023) (Public Comment #544)	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. Denison recognizes that there is a need for and will be an annual evaluation of outcomes. The residual effect on employment and training during Construction, Operation, and Decommissioning is expected to be positive. Positive effects are expected to occur primarily in the LSA and RSA but are also expected to extend beyond the RSA as the labour demands of the Project are unlikely to be met with local resources only. Effects associated with employment are expected to occur continuously through each Project phase, while it is anticipated that training efforts will be focused largely during the operational phase (although some initiatives may be in place prior to the onset of Operation to maximize opportunities). Effects will be reversed after Decommissioning is completed; however, individuals who benefits from employment and training will have skills to carry forward to future opportunities.	Section 13.5 describes the mitigation and enhancement measures for economy, including those specific to education and training	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				Section 13.5 describes the mitigation and enhancement measures for economy, including those specific to education and training: <ul style="list-style-type: none">• Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions (such as Northlands College) to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.• Denison will plan a workforce transition plan prior to Decommissioning of the mine.• Denison will negotiate with the Province of Saskatchewan to develop the Project’s SLA and the Human Resource Development Agreement, which will outline measures in relation to socio-economic parameters related to the Project.				
Métis Nation – Saskatchewan	Health and socio-economic conditions; Other	Further details are required on how emergency preparedness and response plans will adaptively respond to changing climatic conditions and potential unforeseen effects to the Project. Recommendations: - Denison needs to provide additional detail in the Final EIS about their commitment to developed adaptive emergency preparedness and response plans to address unforeseen effects to the Project resulting from climate change.	MN-S Public Comments (March 4, 2023) (Public Comment #547)	Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP). The EPRP would be established to identify how the Project will prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. As such, the documentation will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate. It is confirmed that the EPRP will include provision for change management and an explanation as to how change management will occur. The EPRP will be a living document that will be reviewed regularly and updated as needed - such updates may be required for a myriad of reasons including those related to climate change as noted by the review comment.	Section 2.9 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Interest in understanding about how well Denison was doing (financially) and the effect that has on community investment decisions.	ROC 62	Denison is a publicly traded uranium exploration and development company with interests focused in the Athabasca Basin region of northern Saskatchewan. The company trades on the Toronto Stock Exchange and NYSE American exchange and is headquartered in Toronto, Ontario, with offices in Saskatoon, Saskatchewan, and Elliot Lake, Ontario. Denison strives to achieve the development of the Project through positive partnerships with Communities of Interest, integrating information from Indigenous and non-Indigenous	N/A	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				Interested Parties, and maintaining high standards for environmental protection and worker safety. Overall, the world and Canada need uranium to meet the projected future needs of nuclear power generation, and the Project can provide a critical component in the nuclear fuel cycle while making a meaningful contribution to the Canadian economy and Saskatchewan’s northern and Indigenous communities.		resolution on these issues.		
Métis Nation – Saskatchewan	Other	Concern expressed about ensuring Denison was following engagement protocols set out by the MN-S.	ROC 1 ROC 442	Section 4 describes the approach for engagement between Denison and MN-S that has occurred. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Métis Nation-Saskatchewan noted that the land the Project is located within is subject to a land claim.	ROC 62	Denison thanks the MN-S for the comment.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Questions were asked regarding the ISR mining process, transportation, and exploration.	ROC 62 ROC 1	<p>Section 2.2.1 provides information on the ISR mining method. The ISR mining method uses a water-based solution, fortified with mining reagents, to dissolve naturally occurring uranium from within a host rock, while the host rock remains in place (in situ) below surface.</p> <p>The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. Project-related truck traffic during Construction and Operation (such as surface construction equipment, materials, and drill rigs) is expected to originate from Saskatoon or other southern locations. Project-related traffic originating from the west may travel through Beauval via Highway 165, whereas traffic from the south and east may access Highway 165 via Highway 2. Traffic from Saskatoon would likely use Highway 11 to Prince Albert and Highway 55 to Beauval, then travel via Highway 165. Highways are under the authority of the Saskatchewan Ministry of Highways.</p> <p>The Wheeler River property was staked on July 6, 1977. Excluding the years 1990 to 1994, exploration activities, such as airborne and ground geophysical surveys, geochemical surveys, prospecting, and diamond drilling, have been carried out on the property from 1978 to present. As stated in Section 1.1, Denison became the operator of the property in November 2004 and carried out property-wide airborne geophysical surveys in 2005. The Phoenix deposit was discovered by diamond drilling in 2008 with subsequent delineation completed over the next six years from 2008 to 2014.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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Métis Nation – Saskatchewan	Other	A question was asked about ponds for waste and waste rock.	ROC 1	The proposed ISR mining method for the Project will produce minimal volumes of waste and does not require the development of a conventional tailings management facility. A waste management program will be developed for the Project to support licensing. Denison is proposing to design pond, pad, and landfill liners systems and develop appropriate performance monitoring based on the characteristics of the material being stored. For more information on waste management Section 2.2.4 for more information.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	<p>To date, Denison’s engagement approach has not been collaborative. Denison has not engaged all potentially impacted Métis communities. Denison has focused engagement efforts on Métis communities in NR3. Denison does not acknowledge that the Project falls within the MN-S Homeland. MN-S is listed under Indigenous Organizations instead of Indigenous Communities of Interest. Per Denison’s definition, MN-S, NR1 Locals, and NR3 Locals should be considered an Indigenous Community of Interest. Denison notes site visits as the only engagement-associated activities in each Project Phase. Additional involvement opportunities should be provided to MN-S throughout the life of the Project. Further, MNS refers to CNSC correspondence (Appendix A) indicating that consultation and engagement was expected to be with NR1 Locals, NR2 Locals, NR3 Locals, and MN-S. Given NR2’s involvement in NexGen and Fission, MN-S limited its engagement and consultation expectations to NR1 Locals, NR3 Locals, and itself. Denison did not engage MN-S on potential Project-related effects to Métis traditional use activities (such as but not limited to: hunting, trapping, and fishing) and therefore may not be aware of potential traditional use activities conducted by Métis peoples in and around the Project. Denison’s reliance on reviewing traditional resource user leases is not an appropriate way to determine Métis traditional resource use in and around the Project.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to engage all potentially impacted Métis communities. Specifically, to see Denison equally engage NR1 Locals and NR3 Locals in addition to Kineepik Métis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment, procurement, and cultural opportunities, engagement expectations (e.g., involvement of youth and Elders), and approach for gathering and incorporating Métis Knowledge into Project reports, plans, and processes.- Denison needs to incorporate Métis Knowledge from the Métis Knowledge Study (MKS) into their discipline-specific effects assessment, the Final EIS, and all monitoring plans for the Project, where applicable.- Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to	MN-S Public Comments (March 4, 2023) (Public Comment #439, #440, #442, #444)	<p>Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations.</p> <p>Denison has updated the revised draft EIS executive summary to acknowledge that the Project falls within the MN-S Homeland, including the unique situation that the MN-S have in the area.</p> <p>A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 as described in Section 4). Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). The revised draft EIS executive summary has been updated to acknowledge that the Project falls within the MN-S Homeland,	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		determine the appropriate funding, process, and timeline to conduct the MKS.						
Métis Nation – Saskatchewan	Other	<p>Denison created “Key Issues and Concerns” tables in their EIS to document responses to issues and concerns identified by Indigenous Groups.</p> <p>Denison marked issues and concerns that they believe have been addressed as “Complete” in “Key Issues and Concerns” tables throughout the Draft EIS. Directing MN-S and Métis Locals to chapters within the EIS is not a sufficient response to an issue or concern identified by MN-S and Métis peoples. One- way information sharing is not an effective means for addressing or mitigating issues and concerns identified by MN-S and Métis people. Responses to issues regarding effects should discuss the presence or absence of effects, rather than responding that effects were studied.</p> <p>MN-S has not had an opportunity to review Denison's engagement plan.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to respond to issues and concerns identified through engagement during meetings with and communications to MN-S, MN-S, NR1 Locals, and NR3 Locals. - Denison needs to implement a collaborative engagement approach that allows MN-S, NR1 Locals, and NR3 Locals to provide feedback and inform Project decision-making, plans, and outcomes versus one-way information sharing engagement approach. - Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment. 	MN-S Public Comments (March 4, 2023) (Public Comment #443, #461)	<p>Since being advised by the MN-S in October 2019 that a number of Métis Locals had delegated to the MN-S the Duty to Consult for the Project, Denison has been engaged in extensive ongoing discussions with the MN-S with the goal of reaching agreement regarding the EA process and MN-S' participation in it. Denison continues to engage with the MN-S, inclusive of engagement in NR1 and NR3, at their direction and there is no formal engagement plan, as such Denison does not feel there is a need for MN-S review as continued engagement is informed by and at the direction of the MN-S in an ongoing manner.</p> <p>For example, in recognition of the MN-S potential interests in the Project, Denison and MN-S have negotiated a capacity funding agreement. This agreement outlines a mutually agreeable framework and applicable funding arrangements to facilitate the MN-S’ participation and engagement in the EA process for the Project.</p> <p>The parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings.</p>	Denison continues to engage with the MN-S at their direction and there is no formal engagement plan, as such Denison does not feel there is a need for MN-S to review an engagement plan as continued engagement is informed by and at the direction of the MN-S in an ongoing manner. In recognition of the MN-S potential interests in the Project, Denison and MN-S have negotiated a capacity funding agreement (identified in Section 4).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	<p>The draft EIS does not clarify the influence of groundwater temperature on Whitefish Lake.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to confirm the influence of groundwater temperature on Whitefish Lake in the Final EIS. 	MN-S Public Comments (March 4, 2023) (Public Comment #446)	There is no expectation of influence of groundwater temperature on Whitefish Lake during any phase of the Project. Groundwater would be expected to enter (discharge) to Whitefish Lake at its typical ambient temperature.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	<p>he removal of the freeze wall may cause increased migration of constituents that could cause environmental release to the receiving environment unintentionally.</p> <p>Recommendations:</p> <p>Denison needs to clarify the following with MN-S, NR1 Locals, and NR3 Locals:</p> <ol style="list-style-type: none"> the freezing effects on the Upper and Lower barrier zones post mining, and if the freeze thaw process could cause increased fracturing potential within these zones. 	MN-S Public Comments (March 4, 2023) (Public Comment #447)	A separate technical memo including information related to freeze wall integrity and the basis for design of the freeze wall, which relies on site field data and lived experience from several exiting Saskatchewan mining operations, is provided as an attachment to Attachment to IR-10.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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Métis Nation – Saskatchewan	Other	Denison's EIS suggests SaskPower's work related to the extension of an existing 138 kV line will be independent from work led by Denison. Recommendations: - Denison needs to clarify whether the additional 138 kV line was factored into the cumulative effects evaluation. - Denison needs to clarify whether the proposed Project can proceed without the 138 kV line construction. - Denison needs to clarify the timing of the construction of the line and Wheeler River Project construction. - Denison needs to confirm that SaskPower will engage with MN-S, NR1 Locals, and NR3 Locals on line routing and design. - Denison needs to confirm if/when the 138 kV line will be decommissioned.	MN-S Public Comments (March 4, 2023) (Public Comment #449)	Denison provides that the SaskPower extension of an existing 138 kV line is part of the Project component. As it is part of the Project undergoing the assessment, it is not a distinct reasonably foreseeable development included separately in the CEA.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	The Draft EIS does not include a draft Environmental Protection Plan (EPP) or a summary of how the EPP will be developed. The Métis Knowledge Study is yet to be completed and these plans should not be completed without considering the Métis Knowledge Study. Draft monitoring plans were not available for review to confirm how Denison plans to inform plans with existing local and traditional knowledge. Recommendations: - Denison needs to provide an Environmental Protection Plan with the Final EIS. - Denison needs to involve MN-S, NR1 Locals, and NR3 Locals in the development and implementation of the Environmental Protection Program so that Métis can ensure their interests and Métis Knowledge are included. Additionally involvement in the development of monitoring plans and review of MN-S knowledge usage and how it informed the plan should also be undertaken. - Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for input, review and comment. - Denison needs to include an implementation and reporting plan with the monitoring plans.	MN-S Public Comments (March 4, 2023) (Public Comment #452)	<p>With respect to Part i) of the comment the following is noted. The MN-S review comments accurately indicates that a draft Environmental Protection Plan was not included in the EIS submission; rather, Section 2.9.1.3.1 of the draft EIS provides the commitment to develop an Environmental Protection Program (EPP) and associated plans. The EPP would be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets. The EPP would be developed in a manner that aligns with the ISO 14001 EMS Standard. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. As such, the documentation referenced in the MN-S review comment will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S, and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate.</p> <p>With respect to Parts ii), iii) and iv) of the comment the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLRO are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. Denison is now in receipt of this study and is in the process of reviewing the information contained therein to identify how the information will be incorporated into the final EIS. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been</p>	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison has updated the final EIS to include relevant information in the assessment from the Métis Knowledge Study (applicable to Sections 3, 4, 9, 11, 12, and 13). MN-S will be informed throughout the monitoring program design and implementation process (as described in Section 8).	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				incorporated directly into the draft EIS to determine effects to the human environment. Additionally, and as noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.				
Métis Nation – Saskatchewan	Other	MN-S appreciates Denison’s willingness to evolve engagement activities in response to feedback from MN-S over time. Recommendations: - Denison to continue engaging and involving MN-S, NR1 Locals, and NR3 Locals during the revisions of the Draft EIS and completion of outstanding plans.	MN-S Public Comments (March 4, 2023) (Public Comment #458)	Noted, throughout the engagement, Denison has consistently affirmed its interest in MN-S participation and the incorporation of Métis knowledge into the EIS, in addition to the information and input that has already been gathered with KML.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Denison is taking engagement direction from MN-S to not lump public engagement efforts with Métis engagement is appreciated. Recommendations: - Denison needs to engage Beauval/Sipishik Métis Local #37 throughout the life of the Project.	MN-S Public Comments (March 4, 2023) (Public Comment #459)	Noted, Denison will continue to engage with MN-S, including Beauval/Sipishik Métis Local #37, at their direction for the life for relevant stages of the Project.	Denison will continue to engage with MN-S, including Beauval/Sipishik Métis Local #37, at their direction for the life for relevant stages of the Project.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	It’s best practice in environmental assessments to acknowledge limitations on data and analysis used for the assessment. This identifies constraints imposed on the assessment due to limitations in data or analysis that can influence or limit the ability to predict potential effects of the Project. This may be provided as a “technical boundary” or in some other transparent way as a part of the assessment reporting. Recommendations: - Denison needs to provide details in the Final EIS on data and analysis limitations.	MN-S Public Comments (March 4, 2023) (Public Comment #466)	Data and analysis limitations are described within the relevant VCs existing environment, where applicable. As an example, See Section 12.2.3 Existing Environment for Community Well-Being which describes the limitations of Statistics Canada Census of Population Data, the limitations of Statistics Canada incident-based crime statistics, limitations associated to key person interviews, and others.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Details should be provided on what level of residual effects are carried forward for residual effects evaluation. This would help provide a consistent method for bringing measurable effects for a full residual effect assessment. This ensures that measurable (even minor) are not overlooked in residual effects characterization and consideration of significance. From review of the Draft EIS, there are instances where effects that	MN-S Public Comments (March 4, 2023) (Public Comment #467)	Section 5 of the draft EIS provides an overview of the assessment methodology, including how residual effects were characterized (i.e., those effects that were measurable after consideration of proposed mitigation. Each technical section of the draft EIS where effects are considered (draft EIS Sections 6 through 13) uses this assessment framework in consideration of the specific VCs / KIs that have been defined to represent that environmental component. Effects thresholds that define the presence / or absence of a residual effect have been	N/A	Ongoing - Denison is committed to working toward reaching a	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		remain after the implementation of all mitigation measures and management plans are characterized as minor and not carried forward for evaluation. Recommendations: - Denison needs to provide details on the development and choice of thresholds used to describe residual effects including how LK and IK were considered in threshold development. - Denison needs to provide further explanation as to why minor effects will have no or negligible effects and should not be considered further.		<p>described for each VC / KI. In some cases the thresholds are narrative in nature and in some cases, where available, numeric thresholds are used. The former tended to be based on SME knowledge and experience in like assessments and situations and in the latter the thresholds tended to be derived from published environmental quality objectives and guidelines. As an example, the manner by which residual effects were characterized for the Fish and Fish Habitat VC is given. Section 8.3.6.1 of the draft EIS provides the definition for a residual effect as follows, "A residual adverse effect on the Fish and Fish Habitat VC is defined as a measurable change in the concentrations of a surface water quality parameter(s) that exceed relevant water quality assessment benchmarks that represent concentrations that are protective of aquatic biota and water uses in watercourse and waterbodies that receive mine-affected drainage. " In this example a numeric threshold is used (i.e., a relevant water quality assessment benchmark) and rationale is provided for its use (i.e., represent concentrations that are protective of aquatic biota and water uses in watercourse and waterbodies that receive mine-affected drainage). The threshold is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue.</p> <p>Each technical section of the draft EIS where effects are considered (draft EIS Sections 6 through 13) notes how Indigenous Knowledge (IK), Local Knowledge (LK) and Engagement influenced the assessment. Whether generic or specific in nature the information was considered and woven into the assessment where possible. For example, water and the protection of water was generally noted as a key consideration to Indigenous peoples and LK holders. Accordingly, informs the framework of the assessment to ensure that water quality related VCs are included to provide a comprehensive evaluation related to water quality and affirms the need to assess water quality and sediment quality as they inform assessments for benthic invertebrates, fish and fish habitat, human health, and Indigenous land and resource use components.</p>		resolution on these issues.		
Métis Nation – Saskatchewan	Other	Clarity is required that this includes existing ongoing activities that may not be certain but are highly likely to occur such as forestry and mine exploration activity. Denison did not include the new powerline that SaskPower is building in Table 5.9-1: Projects and Activities for Consideration in the Cumulative Effects Assessment for the Valued Components. See Section 2.3.1.9 for more details on the powerline to be constructed by SaskPower. Recommendations: · Denison needs to provide further detail on the projects and activities that were considered for cumulative effects and why certain projects and activities were not included. For example, Denison needs to explain how reasonably foreseeable projects and activities that may not be certain but are highly likely in the RSA, such as mining exploration or infrastructure use and maintenance, are not included in Table 5.9-1.	MN-S Public Comments (March 4, 2023) (Public Comment #469)	Section 5.9.2 of the draft EIS provides an overview of other Projects and activities that were considered present and reasonably foreseeable and could be a source of residual effects that could interact with the Project-specific residual effects. A preliminary list of projects and activities for potential consideration in the VC-specific cumulative effects assessment for the Project was provided in Table 5.9-1 of the draft EIS and their locations were shown relative to the Project site in Figure 5.9-1. Per Section 5.9.2.1 of the draft EIS, the original (or "preliminary") list of Projects and activities was scrutinized relative to various screening criteria to identify those present and reasonably foreseeable Projects and activities that were likely to interact with the Project VC in cumulative manner. Also show in Section 5.9.2.1 are the criteria by which the Present or Reasonably Foreseeable Projects and Activities were assessed. These criteria are consistent with CEAA's interim technical guidance on a future project (or physical activity) and how it could be considered reasonably foreseeable and areas as follows: • The intent to proceed is officially announced by a proponent.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<ul style="list-style-type: none">• The project or activity is under regulatory review (i.e., the application is in process).• The submission for regulatory review is imminent.• The project or activity is identified in a publicly available development plan that is approved or for which approval is anticipated (e.g., a wastewater treatment plant in a city’s long term development plan).• The physical activity supports—or is consistent with—the long-term economic or financial assumptions and engineering assumptions made for the project’s planning purposes.• A physical activity is required in order for the project to proceed (e.g., rail or port transportation facilities, or a transmission line).• The economic feasibility of the project is contingent upon the future development.• The completion of the project would facilitate or enable the future development. <p>Further information with respect to present and reasonably foreseeable projects and activities pertaining to exploration and mining activities, infrastructure use and maintenance, lodges/outfitters and tourist/ recreational activities and Indigenous and other land use activities are described in draft EIS Sections 5.9.2.1.1 through 5.9.2.1.4, respectively. Rationale for not carrying forward projects / activities that were part of initial screening is described in Section 5.9.2.2.</p> <p>The review comments has specifically references the power line development associated with the implementation of the Project. In response the following is offered. While it is true the power line to service the Project will be constructed by Sask Power the power line has been considered a Project activity for the purpose of the effects assessment and has been assessed in that context. With that there is no rationale nor need for assessing it as a separate project / activity within the CEA.</p>				
Métis Nation – Saskatchewan	Other	There is lack of geotechnical information in the Draft EIS that would expand explanation of Project interactions with geology and groundwater. Recommendations: - The Final EIS needs to demonstrate Denison’s commitment to developing appropriate mitigations to avoid or limit identified adverse effects resulting from the Project, whether direct or indirect.	MN-S Public Comments (March 4, 2023) (Public Comment #470)	Denison recognizes that geology and groundwater are of particular importance within the context of the EIS given the proposed mining method and believes that the assessment presented in the EIS and its supporting documentation is comprehensive. Denison is committed to developing / implementing appropriate mitigations to avoid or limit identified adverse effects resulting from the Project, whether direct or indirect. Proposed mitigation measures specific to geology and groundwater and presented in the draft EIS, Section 7.5, Mitigation Measures, and Table 7.5-1 therein provides a summary of mitigation measures based on Project phases for the geology and groundwater VC.	Proposed mitigation measures specific to geology and groundwater and presented in the draft EIS, Section 7.5, Mitigation Measures, and Table 7.5-1 therein provides a summary of mitigation measures based on Project phases for the geology and groundwater VC.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	There is lack of information, details and modelling related to potential subsidence. Recommendations: - Denison needs to provide additional detail in the Final EIS about mitigation measures related to operations affecting subsidence at ground surface including managing for different subsidence areas, different subsidence sizes, and whether subsidence will propagate further ground surface disturbances that will require further and	MN-S Public Comments (March 4, 2023) (Public Comment #471)	To clarify with respect to the potential for subsidence, it is noted that the portion of the deposit being mined is never truly a void and what remains after mining will be a honeycomb texture with water-filled interstices. The mined area is filled with a fluid at all times, whether it be a mining solution, groundwater, or the neutralizing solution. This is different from a more traditional underground operation such as Cigar Lake, where there is physical excavation of the orebody, leaving a temporary air-filled space. Although the uranium ore is high-grade by global standards it is not entirely massive in	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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		continuous action. - Denison needs to prepare a management and monitoring plan for subsidence.		<p>nature. As such, the uranium will be leached in a 'honeycomb' texture leaving behind a structure of partial intact rock mass with the remaining area being filled by fluid. This retains the pressure balance of the mining zone with the adjacent water-saturated rock masses.</p> <p>Although the above provides context on the absence of true, air-filled voids remaining post-mining, the risk of subsidence has been assessed appropriately in the draft EIS and its supporting documents (see draft EIS as Appendix K to Appendix 7-C; see also draft EIS Section 7 Geology Valued Component - Terrain Morphology and Stability Key Indicator and draft EIS Section 9 Terrain Valued Component - Terrain Morphology Key Indicator and Terrain Stability Key Indicator). The analysis presented in the draft EIS shows there is negligible risk of subsistence and the magnitude of subsistence, if it were to occur, is the range of 7.5 cm at surface.</p> <p>Subsequent to the filing of the draft EIS, Denison has undertaken additional modelling with refined, more granular inputs including consideration of subunits within the altered zone. With this more refined analysis, the potential surface subsidence has been reduced from 7.5 cm to 2.4 to 2.8 mm. Further, this potential subsidence, if it were to occur, would be limited to the footprint directly above the deposit. Given the low levels of risk that has been determined, Denison believes the monitoring and contingency plans as envisioned in the draft EIS are commensurate with this low level of risk and appropriate.</p>				
Métis Nation – Saskatchewan	Other	“Fish Health VC are primarily related to c the controlled” – there is a typo in the report. Recommendations: - Denison needs to address the typo and replace “c” with the complete word.	MN-S Public Comments (March 4, 2023) (Public Comment #475)	Acknowledged. The typo will be corrected in the final version of the EIS as follows, "Potential Project residual effects on the Fish Health VC are primarily related to controlled discharge of site water into local receiving environments during all Project phases."	The typo was corrected in Section 8.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Figure 9.2-8 identifies lakes and waterbodies separately. There is a lack of clarity between a lake and a waterbody and its treatment in the EIS. Recommendations: - Denison needs to clarify and distinguish in the Final EIS if and why lakes and waterbodies are treated differently.	MN-S Public Comments (March 4, 2023) (Public Comment #478)	<p>Footnote 4 of Table 9.2-5 of the draft EIS describes "lakes" and "waterbodies" the difference within the context of the assessment as follows: “Lakes have been defined as either named lakes or waterbodies observed to exhibit an average depth of ≥2 m (Ecometrix Incorporated 2020). Waterbodies are defined as areas of open water observed to exhibit an average depth of <2 m (Ecometrix Incorporated 2020), or unnamed areas of open water without any existing bathymetric information."</p> <p>For further reference it is noted that lakes were not considered wetlands and not carried forward in our assessment, but waterbodies (identified as either <2m deep or without bathymetric information) were conservatively considered to be shallow open water wetlands and assessed in the wetland assessment.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Contrary to the text describing the Traffic Study Area, Highway 914 and Highway 165 are not labelled on Figure 12.3-3. Recommendations:	MN-S Public Comments (March 4, 2023) (Public	Please refer to Figure 12.3-4 which describes the location of the Project in relation to Highway 914 and 165.	N/A	Ongoing - Denison is committed to working	Response to MN-S comments were provided	Discussions continue with MN-S about working toward

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		- MN-S request the revision of Figure 12.3-3 to include labelling of Highway 914 and Highway 165 in the Final EIS.	Comment #517)			toward reaching a resolution on these issues.	on December 1, 2023	a resolution on these issues.
Métis Nation – Saskatchewan	Other	Meeting current regulations and building codes may not be sufficient for short-term or long-term environmental effects as they are characterized in the Draft EIS (e.g., forest fires, flooding). Please provide detail on how the Project will be designed to exceed current regulations in anticipation of changing to environmental conditions. Recommendations: - Denison needs to provide additional detail in the Final EIS describing how the Project will be designed beyond current regulations and building codes in anticipation of changes to environmental conditions.	MN-S Public Comments (March 4, 2023) (Public Comment #546)	From an operations perspective the current mine design is sufficiently robust such that changes in environmental conditions that may be expected, such as increased precipitation event intensity, over the operational life of the mine can be accommodated. For example, the design basis for water management infrastructure far exceeds standard design basis. The following is noted regarding the design basis for water management infrastructure for reference. The probable maximum precipitation (PMP) value of 493 mm selected for design of water management infrastructure, such as ponds, is similar to total annual precipitation (456 mm from Key Lake station, and 483 mm from 1981-2020 climate normals). The selected PMP is well above (>5 times higher): 1) current/measured 24-hour maximum precipitation, 2) modelled 1 in 100 year 24-hour return for current conditions, 3) modelled 1:100 year 24 hour return for a future (2020-2050) period, 4) the predicted maximum 1-day precipitation under different emissions scenarios for the future (including RCP8.5 in the 2021-2050 period). Design basis to accommodate environmental change over the longer term is a factor that will be considered as it pertains to decommissioning. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. Denison is committed to and will factor in longer term considerations of environment and climate within the evolution of the decommissioning plan, and in particular as it concerns how changes in environment and climate could affect decommissioning and restoration goals.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	These meetings had representation from Métis Local #39 (La Loche) and no other Métis. It is unclear who asked, "What are the concerns with groundwater monitoring...". MN-S does not consider Denison's engagement with the EQC as engagement with MN-S or Métis communities. MN-S prefers Denison specify feedback shared at join workshops by Indigenous Nation. Recommendations: - Denison engagement with Métis communities has been limited. In the Final EIS, MN-S expects to see more informed engagement and responses to concerns raised.	MN-S Public Comments (March 4, 2023) (Public Comment #549)	Thanks and noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3.	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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Métis Nation – Saskatchewan	Other	<p>Page ii of this document states: ““By accounting for these reactions, the simulated dissolved constituent plumes emanating from the ore zone reach their maximum extents within the deeper units (i.e., Lower Sandstone Aquifer and deeper parts of the Desilicified Zone) after approximately 10,000 years. Consequently, concentrations at Whitefish Lake throughout the future centuries are simulated to be similar to background concentrations. Under the base case scenario, which represents a conservative estimate of the conditions present, there are no exceedances of the groundwater quality screening criteria protective of freshwater aquatic life in the receiving environment.” Whether conditions are “conservative” or not, is dependent on perspective.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to provide further rationale detailing how the “base case scenario” represents a conservative estimate of the conditions present. 	MN-S Public Comments (March 4, 2023) (Public Comment #550)	<p>It is acknowledged that additional details could have been added to the Appendix 7-C Executive Summary to provide more fulsome context for the comment that the "base case scenario" is conservative. The basis for this statement was the robust data set of subsurface geochemistry that supported the assumptions in the model with respect to concentrations of sorbing mineral phases and the uncertainty analysis that was performed. The uncertainty analysis evaluated the potential that conditions at the base case were not adequately conservative. The uncertainty analysis is detailed in Section 4.7 of the report. This included increasing the mass of chemical constituents of potential concern (COPCs) within the source (mining area), increasing the hydraulic conductivity of key zone and/or hydrostratigraphic units, decreasing the number of reactive sites for sorption of COPCs, removing some sorbent phases altogether from key hydrostratigraphic units, and other scenarios focused on geochemical and hydrologic uncertainties. Altogether, there were 15 uncertainty scenarios tested in addition to the base case.</p> <p>For the base case, and all uncertainty scenarios, no exceedances of ground water quality screening criteria were generated at Whitefish Lake into the future (i.e. over the "future centuries" period), apart from those that reflect natural conditions. The results are provided in detail in Sections 4.6.6 and 4.7.1 of Appendix 7-C and the consistency of the uncertainty results with the base case affirms that the base case simulation is appropriate for decision-making.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	<p>Denison provides no rationale for “conservative dispersivity values” in the Draft EIS.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to provide site-specific research to confirm literature dispersivity values are conservative in the Final EIS. 	MN-S Public Comments (March 4, 2023) (Public Comment #551)	<p>Site-specific research, as understood from the comment, would require a natural gradient tracer test over the distances of interest (> 1 km). Such testing would take centuries, and therefore is not practical. For this reason, use of literature dispersivities is standard practice.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	<p>Additional modelling will be needed to confirm at the time of decommissioning the assumption that there is “large assimilative capacity” of the groundwater system, in order to manage risk in Whitefish Lake.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison to complete simulations that increase focus on maintaining containment of the contaminant source for a greater period of time (i.e., a higher level of focus on source term control and flushing), and less reliance on management of contaminant along the pathway, prior to the contaminant reaching the receptor. In other words, simulations that focus, to a greater extent, on evaluating the benefit of additional effort and time on source term control (the first step in the risk hierarchy of source, pathway, receptor). 	MN-S Public Comments (March 4, 2023) (Public Comment #552)	<p>The comment is noted and it is Denison's intent to continue to evaluate what is reasonably achievable with respect to remediation of the mining zone water quality prior to discontinuation of containment measures. After 30+ years of monitoring we will be in a better position to update predictions and have enhanced confidence in the assimilative capacity. Flushing of the source zone is part of the planned remedy and would only be stopped once the target level of remediation has been achieved. Beyond that flushing period (which may take years), if conditions indicate additional long-term source control is required, then Denison may have to do that, but our current understanding suggests long-term source control is not needed so long as the flushing is able to reduce source concentrations to the target amounts. Lab testing suggests the proposed flushing will be effective at reducing concentrations to the target values.</p> <p>Additionally, we note that refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances.				
Métis Nation – Saskatchewan	Other	Denison assumes non-surface reaching groundwater will not be extracted or accessed by future generations. Recommendations: - Denison to study and provide further understanding of deep groundwater characteristics with MN-S, NR1 Locals, and NR3 Locals prior to commencement of mining operations. This information may affect final closure options. - Denison to consider modelling for surface receptors of deep groundwater beyond the boundaries identified in Section 1.1.	MN-S Public Comments (March 4, 2023) (Public Comment #553)	Denison did complete engagement with Interested Parties, including Indigenous Communities of Interest and it is based on that engagement that it is understood deep groundwater use does not presently occur, nor is expected to in the future. Further, impacted groundwater is 100's of meters below ground surface, which is far below what would be needed for a future water supply as the flow through the shallower aquifer is far greater than through the deep aquifer. During operations, Denison will continue and expand groundwater monitoring to ensure that current study findings are realistic. Modelling simulations report the highest levels of predicted discharge to surface water - any discharge to more distant surface water bodies would be at even further reduced concentrations. Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	Denison's Draft EIS does not confirm if the groundwater recharge rates were adjusted for potential changes to recharge as a result of climate change. Recommendations: - Denison should develop a Project-specific climate change model database, which clearly articulates the shared socioeconomic pathway (SSP) the Project is choosing from IPCC AR6, and show how that scenario has been down-scaled for use within Project modelling predictions, and present the results in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #554)	<p>A qualitative and quantitative assessment of climate change and groundwater and surface water is provided:</p> <p>The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early fall, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late fall, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late-century periods.</p> <p>If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure.</p> <p>Section 8.1.3.4 (and Appendix 8-C) provides a quantitative assessment of the potential changes in surface water quantity due to climate change. The 1:100 year, 24-hour return period rainfall events for the baseline and climate change influenced IDF curves are 79.9 mm and 88.6 mm, respectively. The PMP for the Project is estimated to be 493 mm (refer to IR-15 and AD-15) which is well above both 24-hour maximum precipitation and 1:100, 24 hour return precipitation events. The PMP is very conservative (e.g., assumes effectively a full year of precipitation in one event) under both existing and future conditions (climate change). The potential impacts of climate change to precipitation and therefore flows was summarized in Appendix 6-C, Table 10 with the total annual precipitation and the maximum 1-day events being variable over the next four decades (Table 1). Regardless, the climate change scenario indicates a potential increase in event based assimilative capacity in the receiving environment. TABLE 1- Existing and Predicted Precipitation Data for Key Lake (provided in EIS, Appendix 6- C, Table 10).</p> <p>To mitigate the potential for unplanned release of deleterious substances into the surface water environment even during the next 40 years of climate change, the PMP of 493 mm was used for water management engineering designs. During a PMP, water requiring management will report to the wellfield runoff pond which will be sized to accommodate a PMP event at the site. This pond has been sized to 38,200 m3 (excluding a freeboard of 1 meter). From the wellfield runoff pond, water will then be sent to the process water pond for treatment if required. In Section 2.8 Project Design Features, Denison notes that “Ponds will be designed to maintain a minimum freeboard of at least 1.0 m to allow for continued functioning during a probable maximum precipitation (PMP) event.” As such, the project has been designed to manage water during PMP and greater, and therefore mitigation of potential impacts to water quality due to climate change has been initially included as part of the EIS. As a result, it is Denison's opinion that a quantitative assessment of potential impacts to surface water quality is not warranted as it is likely to indicate improved results from the conservative assessment of potential water quality changes during operation and decommissioning phases. Continued monitoring of background, effluent and receiver water quality will be undertaken and provide the ability for adaptive management throughout the life of the mine in association with potential climatic changes to the local and regional area.</p>				
Métis Nation – Saskatchewan	Other	<p>Water levels in surface water features are not static; they change in response to regional climate and flow conditions. This would influence the interaction between groundwater and surface water, as the assumption by the model developer is that water levels are input as static head boundary conditions.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to explain in the Final EIS why static head boundary conditions are used for the modelling beyond a need to simplify the modelling.	MN-S Public Comments (March 4, 2023) (Public Comment #555)	<p>Water levels within surface water bodies were monitored over several years. The range of observed water levels at Whitefish Lake (SA-6) during 2016-2018 was 499.5 to 500.2 m ASL, with an average of 500.1 m ASL; as such the value assigned in the model (500.0) is an accurate (and slightly conservative) reflection of the average water level observed. What is important is the hydraulic head difference over the 300-year (or more) transport travel time. Recognizing that future conditions could be different by as much as 2 m (i.e., the depth of Whitefish Lake), this range of water level could be tested.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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Métis Nation – Saskatchewan	Other	<p>Denison does not provide the basis, explanation, or literature to state that a calibrated model to observe water levels is sufficient with a deviation of +/- 2m.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison needs to provide an explanation, basis, and/or literature to state that a calibrated model to observe water levels is sufficient with a deviation of +/- 2m in the Final EIS. <p>Denison provides no rationale/basis for considering a mean error of 0.23 considered to be an “excellent match” to the observed water levels.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison should provide an explanation, basis, and/or literature for why a mean error of 0.23 is considered to be an “excellent match” to the observed water levels in the Final EIS. 	MN-S Public Comments (March 4, 2023) (Public Comment #556, #557)	The mean residual is 0.23 m, not 2 m as inferred. The 2 m guidelines are merely presented for reference. The literature is quoted regarding the goodness of fit parameter NRMS, which is normalized so that it can be applied to any model. The NRMS achieved within the Denison model is 4.1%, whereas the literature (Spitz and Moreno) recommend 10% or less. As such the model is considered calibrated by literature standards. The qualitative term "excellent match" is based on 30-years of experience in developing 100's of similar numerical groundwater flow models.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	<p>Ecological receptors could potentially be exposed to groundwater flows.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison should provide an understanding of deep groundwater as a contaminant pathway to ecological receptors within immediate vicinity in the Final EIS. 	MN-S Public Comments (March 4, 2023) (Public Comment #558)	Denison and its SMEs believe that this (i.e., what is referenced in the review comments) is what has been done (and presented in the report) by evaluating groundwater flow to a small portion of Whitefish Lake. At other locations (e.g., the edges of the Lake), shallow groundwater will be discharging, which has not come into contact with the deeper groundwater.	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	<p>The Project has assumed that it is “conservative” to supply all water for the Project from outside the ore zone, and assume minimal influent from re-cycled / treated water. This statement supports that position.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> - Denison should provide simulations that maximize recycling treated water, rather than minimize using recycled water for the Project. - Denison to confirm how groundwater quality predictions differ when recycled and treated water is used to supply water to the Project, as compared to assuming conditions as noted in this statement. 	MN-S Public Comments (March 4, 2023) (Public Comment #559)	<p>With respect to the first bullet: It is believed that the analysis completed is appropriate given that it represents a conservative (i.e., protective) means by which to assess the activities potential effects. The scenarios / simulations referenced in the review comment therefore are bounded by the conservative water supply assessment as it concerns potential Project effects to groundwater quantity. Denison concurs with the idea that it would be beneficial to maximize recycling of water and will strive to do so; however, this is more of an operational consideration. As outlines in draft EIS Section 2.2.3, Denison intends to recycle process water to the greatest extent possible, thereby reducing the demand for fresh water supply and volume of treated effluent. In an effort to develop a conservative assessment basis for the EA, the water recycle flows from the industrial wastewater treatment plant back into the processing plant and wellfield have not been incorporated into the estimates for freshwater withdrawal and treated effluent discharge.</p> <p>An overview of the site water balance during Construction, Operation, and Decommissioning are provided in draft EIS Figure 2.2-14, Figure 2.2-15, and Figure 2.2-16, respectively. These figures provide a summary of the water needs for certain Project activities, plans for water treatment (both potable and wastewater), and the general flow of managed water at the site. The estimated flows in the site water balances do not account for water recycle back into the processing plant and wellfield. This results in a conservative estimate of both freshwater withdrawal needs and treated effluent discharge rates.</p> <p>With respect to the second bullet point: Under the modelled scenarios, in which</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				water is withdrawn from three water supply wells, the shallow groundwater system is simulated to recover very quickly following the cessation of decommissioning. Thus, the taking of shallow groundwater during Operations and Decommissioning will not influence the overall transport of potential contaminants in Post-Decommissioning after the containment (including the freeze wall) is removed. In addition, it should be recognized that if less water is withdrawn from the shallow bedrock for Operation, that additional groundwater left in the flow system will naturally act to further dilute any concentrations reaching the shallow aquifer and surface water receptors. That is why we feel the simulations presented are conservative.				
Métis Nation – Saskatchewan	Other	The interaction of increase drought or increased precipitation (i.e., climate change) could potentially affect the length of time for full recovery of groundwater recharge due to potential changes in climate conditions. Recommendations: - MN-S requests that interaction between climate change scenarios and groundwater modelling should be included in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #560)	<p>The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early all, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late all, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late- century periods. If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure.</p> <p>The groundwater model will be updated over the course of mine life to among other things support the decommissioning plan that will consider recovery in the mining zone. Such model scenarios would incorporate up to date information with respect to climate change and the potential effects of climate change on the groundwater environment.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.
Métis Nation – Saskatchewan	Other	It is unclear if the statements made about full recovery and 90% recovery are defensible given that calibrated hydraulic conductivity values, as shown in Table 2-2 (p. 2.7), for the lower sandstone aquifer ranges over 2 orders of magnitude, and the ore zone calibrated hydraulic conductivity over nearly 5 orders of magnitude, and that no range in hydraulic conductivity is reported for the desilicified sandstone aquifer (i.e., a single calibration value is reported). Recommendations: - Denison should provide simulations that consider the full range of calibrated hydraulic conductivity values in the Final EIS.	MN-S Public Comments (March 4, 2023) (Public Comment #561)	<p>The calibrated hydraulic conductivity values are consistent with observed data. The calibrated K value for the intermediate aquitard was 1x10-8 m/s, which is in the middle of the range of values reported from point testing within this unit (Range: 10-10 to 3.8x10-6 m/s), and similar to the geomean value (8.4 x10-9 m/s). Thus, the calibrated K value is within a factor of 1.2 of, and higher than, the geomean value. The hydraulic conductivity value for the Intermediate Aquitard is similar to that applied by AECL at Cigar Lake (5x10-8 m/s). Similarly, the K values applied for the Upper and Lower Sandstone Aquifer units are consistent with the field measured values, particularly for this fractured rock environment. The high end of the packer tested range of K values varied by 2 orders of magnitude between the aquifer and aquitard units, which is consistent with the definition of aquifer / aquitard differentiation. The interpretation of an aquifer-aquitard-aquifer sequence is consistent with the AECL interpretation of the Athabasca Sandstone at the Cigar Lake mine.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>When packer testing in fractured rock, the hydraulic conductivity associated with any test depends on whether the packed zone contains a continuous fracture set. However, for the unit as a whole, it is important that the model represent the hydraulic conductivity (or transmissivity) representative of the interconnected fracture network. Thus, it is appropriate that the applied hydraulic conductivity values within the aquifers are consistent with the higher end of tested conductivity values within those units. Within aquitard units, having singular higher conductivity fracture values from packer tests that test local fractures only, does not necessarily indicate large-scale transmissivity.</p> <p>A fault feature is suspected along the western perimeter of the Lower Sandstone Aquifer near Kratchkowsky and Williams Lake, located 1.5 km west of the mine site (also as depicted on the Hydrogeological Conceptual Site Model). This feature was interpreted to exist based on the similarity in groundwater levels between deep and shallow aquifers in that particular area (c.f., water levels along the creek south of Williams Lake and within GWR-029, as well as water levels recorded in open boreholes near Kratchkowsky Lake), as well as geochemistry in GWR-029. The geochemistry and water levels show in the vicinity of GWR-029 are different, however, than conditions within the Lower Sandstone aquifer further east of this area, above and east of the Phoenix deposit.</p> <p>The effect of the fault feature along the western edge of the Lower Sandstone aquifer was incorporated within the numerical model both through enhanced hydraulic conductivity parameters, as required to match observed water levels, and boundary conditions applied to introduce as much inflowing water to the Lower Sandstone Aquifer as the water level data suggest is reasonable.</p>				
Métis Nation – Saskatchewan	Other	<p>No time period is provided to reach acceptable levels of remaining contaminants or effective remediation accomplished in order to leave the area in a pre- mining condition.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to provide more clarity on what the expected time period to reach acceptable levels of remaining contaminants or effective remediation in order to leave the area in a pre-mining condition. This unknown time frame may play into the viability of remediation and final closure costing.	MN-S Public Comments (March 4, 2023) (Public Comment #562)	<p>Groundwater remediation targets provided in the draft EIS were from derived from metallurgical test results completed from 2017 to 2021 with over 125 kg of material recovered from Phoenix deposit that underwent leaching and neutralization test work (see response to IR-67). In 2022 and 2023, metallurgical test work continued to further optimize remediation and strategies and confirm test work results presented in the draft EIS. It is expected that metallurgical test work will continue in the future to further optimize remediation targets, and this will be advanced through updates to the Decommissioning Plan. The Feasibility Field Test (FFT) provided additional confirmation that pH target and remediation targets could be met. Data gathered during the neutralization phase of the FFT provide confidence that groundwater targets proposed in the draft EIS can be met technically and economically. Based on laboratory testing and the results of the 2022 field testing, subsurface remediation is planned to consist of rinsing the ore zone with 35 pore volumes of fresh water, slowly raising the pH and then pumping about 75 pore volumes of basic solution through the same portion of the ore zone. This basic solution will in effect further raise the pH to a level that impedes further leaching of the deposit and reduces aqueous concentrations of contaminants of concern to below their environmental target levels.</p>	<p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p>	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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				<p>Refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances.</p> <p>As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.</p>				
Métis Nation – Saskatchewan	Other	<p>Climate change as a variable does not appear to have been incorporated into the modelling.</p> <p>Recommendations:</p> <ul style="list-style-type: none">- Denison needs to provide more clarity in the Final EIS on how climate change as a variable has been incorporated into the ground water modelling as climate changes scenarios and effects on the groundwater could affect the closure pathway.	MN-S Public Comments (March 4, 2023) (Public Comment #563)	<p>The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early all, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late all, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late- century periods. If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure.</p> <p>The groundwater model will be updated over the course of mine life to among other things support the decommissioning plan that will consider recovery in the mining zone. Such model scenarios would incorporate up to date information with respect to climate change and the potential effects of climate change on the groundwater environment.</p>	N/A	Ongoing - Denison is committed to working toward reaching a resolution on these issues.	Response to MN-S comments were provided on December 1, 2023	Discussions continue with MN-S about working toward a resolution on these issues.

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						interests. Denison remains committed to engaging with the YNLR to come to resolution.		

APPENDIX C: Economics Technical Review

Impact Economics

Denison Mines Wheeler River Project FEIS Section 13 – Economics Technical Review

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Section 13 – Economics of Denison Mines’ Wheeler River Project FEIS presents a high-level assessment of the potential economic effects of the Project. I found no errors regarding the accuracy of statements in the Section. However, it is my professional opinion that important details are absent that would otherwise be required to fully understand potential Project effects, positive or adverse, on key indicators of the economy VC for the local and regional study area. Best practice would include a more comprehensive study of current conditions, including differences between populations present in the area. Best practice also demands a more detailed exploration of how money might flow from the Project proponent to local and regional labour and capital, and to consider the effects of that money on individuals, families, communities, and businesses, and to correctly situate those effects based on the current economic conditions of those families and communities. Additionally, best practice includes greater specificity on the Project’s planned expenditures to better explain the labour and capital needed, and the inclusion of meaningful targets for local and regional labour and business participation such that future performance in these areas can be evaluated. While one cannot predict precisely how labour or business will respond to a change in demand, a study of history and a more detailed analysis of current conditions would lend itself to reasonable prediction in these areas, would ground the assessment on evidence, and would inform mitigation. In the absence of this evidence, there is nothing from which to evaluate the qualitative statements made throughout this section of the FEIS.

Overview

Section 13 – Economics of Denison Mines’ Wheeler River Project FEIS presents a high-level assessment of the potential economic effects of the Project. It follows the guidelines as written in CEAA, 2012. While the assessment meets the required regulations, there are numerous examples of where the use of best practice within modern environmental assessment would have offered a richer account of the predicted effects.

How a project interacts with the human environment it is entering is an important consideration. This can include economic effects that many would perceive as being positive. It is nevertheless important to examine these effects and the pathways that lead them to families, communities, and businesses. One cannot assume that the creation of a job, for example, is in itself a benefit. It is important to consider the type of job being created and to gather evidence regarding the local labour supply to determine whether new jobs are wanted or needed, that the education and skills needed to work that job exist within the local labour supply, and how the new job might affect the overall labour market. Where certain challenges are discovered in the pathway from job creation to local employment, there is value in describing that challenge and how mitigation might address it.

Excluding such details is a missed opportunity to demonstrate the extent to which industrial activity can transform or sustain an economy. Affected communities should be afforded the opportunity to understand how a proposed project will affect them more precisely than what was provided in the Wheeler River Project FEIS. This would include a recognition and exploration of the diversity of communities within a geographic setting. For the Wheeler River Project this includes a distinction between First Nation and Métis peoples and between wholly-owned Indigenous businesses and Indigenous joint ventures, as examples. In a worst-case scenario, leaving out critical information or failing to appreciate differences that exist within a population might lead a reviewer or affected community to draw the wrong conclusion when considering whether effects are beneficial or adverse, and ultimately when evaluating the overall assessment.

Baseline Evidence vs Predicted Effects

The economic assessment identifies five key indicators including

Employment and Training

Income

Traditional Economy

Business Opportunities

Government Revenues

Section 13.2 offers a high-level account of the current conditions associated with these five areas. Employment and Training conditions are represented through labour market statistics, employment data by industry and by gender, and educational attainment data. Average and median income of individuals and households is provided alongside data on wage rates and sources of income to describe LSA income. The baseline presentation of Traditional Economy relies on the 2017 Aboriginal Peoples Survey conducted by Statistics Canada and the ERFN

Country Food Study that was also completed in 2017. Business Opportunities baseline data is presented as lists of registered businesses in LSA communities. Finally, the current tax regime in Saskatchewan related to uranium mining is provided as part of the Government Revenues baseline along with some historical data on revenue collections from these taxes in 2021 or earlier.

While the current economic data as presented is adequate, it falls short of demonstrating what economic life is like in the LSA communities, and does not lend itself to detailed analysis when attempting to compare the predicted economic effects of the Project. The data illustrate economic conditions that are below the average in Saskatchewan, in most instances, with high rates of unemployment and low employment rates. A similar conclusion can be drawn from the presentation of education and income data. Based on the small number of registered businesses listed for the LSA communities, one could also conclude that the small population size and remoteness of these communities coupled with the lower levels of disposable income mean the communities are not commercial centres.

Looking at modern impact assessment, there is growing interest in a far richer understanding of current conditions. The Tailored Impact Statement Guidelines Template describes in Section 5.3 Health, social, and economic conditions of Indigenous Peoples:

"The Impact Statement must assess the impacts of the project on the health, social and economic conditions of Indigenous Peoples."

While 5.3.1 Baseline conditions for the health, social and economic conditions of Indigenous Peoples states:

"The Impact Statement must:

- describe the health, social and economic conditions of each impacted Indigenous group using disaggregated data where available and considering intersecting identity factors and differing access to resources, opportunities and services;
- describe how cumulative effects have already impacted the health, social and economic conditions of each Indigenous group;"

Moving into Section 13.3 Assessment of Project-related Effects, the current economic conditions as presented do not appear to appropriately inform the effects assessment. Instead, the effects section includes general statements about the historical performance of uranium operations, committing to making LSA labour and business participation a priority. It is not clear what that means, or what it might translate to for LSA residents in the face of the current conditions. There is no evidence or dialogue to fully inform reviewers of the level or extent of participation that can be expected, or how potential barriers to participation will be addressed apart from general statements regarding regional and provincial education and training programs. The FEIS could make greater effort in considering the economic conditions of each impacted Indigenous group, the groups' access to resources, opportunities, and services, and the effect of past uranium mining (or industrial activity more generally) have affected each group over time.

The statement below stands as an example of a statement in the FEIS that does not address the needs or concerns raised by LSA members regarding their participation in the Project.

"Since 1992, other uranium operations have maintained a high rate of northern employment (47%), with 39% of the workforce identifying as Indigenous (Government of Saskatchewan 2018)." (Page 13-63)

It is not clear if this statement is made to connect current conditions and the role of uranium mining in the region. It also does not help situate the effects. Northern employment extends well beyond the LSA, but it is not clear how far beyond.

In another example, Denison states that it "... has identified areas where there are likely synergies with labour demand and availability within the LSA" (Page 13-63) but does not describe what these synergies are, if they apply generally across the entire region or to specific groups within the LSA, or what they might represent in terms of the number or percentage of LSA labour and business participation. What is meant by availability in the context of the LSA labour market? Does the Project proponent expect to find employees from within the pool of unemployed residents, from residents who not are not in the labour market, or from those who are currently employed elsewhere?

Consider the approach to be taken by the Peace River Nuclear Power Project as described in the Integrated Tailored Impact Statement Guidelines for that project. In Section 9.5.2 Effects on employment of that document, it clarifies that

"The Impact Statement must:

- describe the potential changes in employment including the following aspects:
 - an estimate of the direct, indirect and induced employment at each phase of the project;
 - an estimate of direct, indirect or induced income or wages;
 - a description of the types and duration of employment anticipated to be created at each phase of the project;
 - an estimate of the ability of the local and regional labour market to meet the demand;

an analysis of the potential for labour shortages in certain sectors as a result of the project;
a description of the plans and the justification for hiring of temporary workers to make up for any local shortage of labour and skills;
situations where the project may cause the displacement of local workers, and
any potential short, medium and long-term changes to the local and regional labour markets as a result of the project”

The Wheeler River Project FEIS does not meet this standard. While it should be acknowledged that it is considerably smaller in terms of total project expenditures, the important takeaway is the attention to details when it comes to the effects of an industrial project on LSA residents. Projects, whether the size of the proposed Peace River Nuclear Power Project or Denison Mines’ Wheeler River Project do not occur in isolation from the rest of the economy, and the effects, beneficial and adverse, should be examined and communicated.

Project Expenditures as the Basis for Conducting an Input-Output Analysis and Providing Greater Detail in Predicted Effects

Missing from the Assessment of Project Effects is a detailed description of Project expenditures that could form the basis of a far greater understanding of how people and communities will be affected by the Project.

Best practices in this area have been in place for close to 20 years, and its absence from this FEIS stands out as a gap. Consider the Socio-Economic Impact Assessment Guidelines for the Mackenzie Valley Environmental Review Board published in 2007, where Section 3.4.4 Tools for Characterizing and Predicting Impacts on the Wage Economy highlights the use of fiscal analysis, cost-benefit analysis, and Input-Output analysis as potential methods to examine effects on employment, income, education and training, economic leakage, business growth and development, government costs and benefits, and the net social benefit.

More recently, the Province of British Columbia has adopted a similar regulatory approach for assessing economic effects. Those regulations describe the need for early engagement on assessment approach, and suggest possible (but not exhaustive) assessment tools that include Input-Output Modelling, Equilibrium Modelling, Cost-Benefit Analysis, Land and Resource Valuation, Multiple Criteria Analysis, Cost of Living Analysis, Government Finances Analysis, and Benefits Planning. Again, these regulations stand as a strong demonstration of shortcomings within the Wheeler River Project FEIS that has not including any such methods apart from a high-level assessment of government financial analysis.

The expenditure patterns for building and operating uranium mines in Saskatchewan are well established and easily accessed from Statistics Canada’s Industry Accounts Division that could be adjusted based on input from the Project proponent if possible. But even at a general level, including these details would greatly improve the assessment. Identifying when and where the Project will spend money is the best way for affected communities to understand how money will enter their community, the scale of expenditures, and the labour and business that might benefit from it. Moreover, using Statistics Canada’s Symmetric Input-Output Tables to conduct an Input-Output modelling exercise would help determine the potential direct endogenous, indirect, and induced effects with far better precision than what was presented, again giving some substance to the general statements presented in the FEIS, and affording affected communities the opportunity to assess the net benefit of the Project.

“Examples of anticipated goods and services needed at the Project site may include catering, housekeeping, food, freight, and bulk materials such as fuel, propane, and reagents.” (Page 13-70)

“In 2018, the northern mining industry in Saskatchewan reported that it purchased 45% of its total goods and services from northern Saskatchewan businesses and joint ventures and has continued to maintain a long-term trend of high levels of northern purchases (Government of Saskatchewan 2018).” (Page 13-70)

It is not possible to substantiate the latter statement based on the level of detail provided in the FEIS, and is potentially misleading. It is not made clear if 45% is the benchmark for northern Saskatchewan businesses. Is this meant as a target? Are there efforts planned that might improve that result? What aspects of northern Saskatchewan are contributing to that result?

It is also not clear what business activity might take place in the LSA. And, importantly, the FEIS does not distinguish between northern Saskatchewan business and joint ventures. To the latter point, Project proponents should be cautious when implying economic benefits based on the revenues of joint venture businesses without clarifying the nature of the joint venture. As an example, a joint venture where the Indigenous partner owns 51% of the business may not result in 51% of the benefits flowing to that partner or the associated community. It is also important to separate the value of contracts awarded for the purchase of goods versus services, given the economic benefits can differ significantly between the two.

Including some level of detail on operational expenditures, conducting a detailed Input-Output analysis of the Project, and connecting the results of that analysis with the current supply of labour and business capital in LSA and RSA communities with some consideration of the diversity of peoples inhabiting these communities would improve the quality of the FEIS by providing reviewer details they need to understand the full extent of the Project’s economic effects, and understand where, how, who, when, and to what extent resident labour and business might participate and what they can expect in terms of net social benefit.

Connection between Mitigation Measures and Predicted Effects

The mitigation measures fall short of providing a clear path between any shortcomings within the labour supply and business community and participation in the project. This is largely the result of an inadequate examination of current conditions that considers the diversity within the population within the LSA and RSA and having not explored in enough detail how Project expenditures will affect people. There is an opportunity for the proponent to take a more robust position in identifying precisely when, where, and how it will work with communities to improve the probability of their participation in the Project.

Historical Evidence of the Economic Effects of Uranium Mining in the LSA

As noted earlier, the FEIS contains statistics related to the current economic performance of residents in the LSA and RSA. Missing from that presentation of statistics are results of the LSA community participation in past and current uranium mining projects. The FEIS notes that uranium mining's historical record in the region dates back to 1992, but does not include any specific evidence in that regard. A reviewer might find it curious that after 30+ years of uranium mining in the region that the key economic indicators for the LSA are not better, leading to questions that the FEIS does not answer.

It might be that uranium mining has been transformative for some individuals, families, businesses, and communities in the region, but there is no evidence presented to that end. This seems to be a gap in the FEIS.

Recommendations

It is recommended that the economic effects assessment within the Wheeler River Project FEIS include the following additions:

1. The examination of current conditions should be more comprehensive and make a greater effort to disaggregate economic data between the populations of interest, that would include separating, where possible, the conditions of First Nations and Metis populations living within the same geographic setting. This level of detail is not necessarily collected by Statistics Canada, though more data can be sourced through requests for special tabulations than is published. In the absence of such data, other methods might be employed, including community surveys. While the end result might not provide a comprehensive picture of economic conditions, it will help inform how the Project's expenditures might affect these populations differently.
2. A more robust form of economic and financial analysis is required. The analysis as presented is high-level to the point of offering very little in the way of information that could inform LSA and RSA residents and business on the potential effects they might experience, and certainly does not present enough information to stimulate action or investment that might otherwise enhance benefits or reduce adverse effects. While there is some high-level analysis of potential government revenues, the FEIS does not provide enough detail on potential costs such that the net social benefit of the Project can be assessed.
3. More details are needed to demonstrate the pathway between Project demand and the effected region's supply of labour and capital. In presenting the categories of jobs that will be created should the Project proceed and the expected demand for goods and services, the assessment does not do enough to link the job creation and business demand to the current workforce and business community present in the LSA and RSA, or how different groups within that population (First Nations, Metis, non-Indigenous peoples) might experience the effects differently.
4. Greater analysis of cumulative effects is required, in particular, how the past 30+ years of uranium mining in the area has affected residents in the LSA. Some attention is needed to determine how different segments of this population have fared during this time, and where these groups are at in terms of their path towards greater economic development. This study will inform whether the proposed Project represents anything new for affected communities, and shine some light on any areas that may require attention, despite the decades of industrial activity.

By adopting the first four recommendations, new information will become available that will inform Project actions and enhance future monitoring. This might include mitigation to increase participation that is tailored specifically to the different groups present in the LSA and RSA communities.

APPENDIX D: Water Quality Technical Review

October 1, 2025

Wheeler River Project Final Environmental Impact Statement

Summary of Review Comments

GEM Services reviewed the reports “Wheeler River Project – Final Environmental Impact Statement” (Denison Mines, November 2024) and “Environmental Assessment Report: Wheeler River Project” (Canadian Nuclear Safety Commission, August 2025). The review focused on the interaction between the mining solution and the groundwater system, particularly during decommissioning and post-decommissioning periods.

In summary, the proposed approach to decommissioning the mining area is to maintain containment with the freeze wall while flushing the mining area to remove the acidic mining solution. This containment reduces the risk of poor water quality spreading into the local groundwater system during decommissioning. The post-decommissioning period was modelled to predict the change in water quality in Whitefish Lake. The approach to modelling and the data used was appropriate for this stage of development. It is noted that groundwater travel speeds are such that any potential impacts to Whitefish Lake will only be detected in several hundred years.

Predictions of this nature are based on the assumption that the interpretation of the geology, mineralogy and porosity is between drillholes is accurate. However, the reality is that the underground is more heterogenous; therefore, groundwater and chemistry modelling always has a certain amount of uncertainty, even when the modelling is appropriately done. Prediction modelling becomes more accurate as the degree of site characterization increases, which typically occurs as site development and mining progresses. In this context, monitoring and adaptive management plans are critical elements for managing the environmental performance of the mine. This is acknowledged in the final environmental impact statement.

Given this context, the following are recommended.

- The CNSC will require additional site characterization of the geology and hydrogeological conditions and an updated groundwater and chemistry model for the site. It is recommended that the updated model be submitted to MN-S for review and comment.
- Denison proposes to update the conceptual decommissioning plan to a draft plan once detailed engineering and updated groundwater modelling is complete. It is recommended that completion of this work be a requirement for licensing and permitting.
- Denison proposes to submit a detailed groundwater monitoring plan once detailed engineering and updated groundwater modelling is complete. The updated plan should outline specifics as well as contain measurable criteria for triggers in the adaptive management process. It is recommended that completion of this work be a requirement for licensing and permitting.
- It is recommended that the MN-S have the opportunity to review and comment on all updated plans as part of the licensing and permitting process.
- It is recommended that the MN-S be named as one of the parties in addition to Government ministries and regulators with whom Denison consults when developing mitigation strategies as part of the adaptive management process.

I trust this provides the information you need at this time. If you have any questions or require additional information, please contact me at 778-828-7753 or dsollner@gemservices.ca.

Yours truly,

DS GEM Services

Diana Sollner, MASc, MBA, PEng, CDI.D

Principal, Environmental Engineering

Attach. FEIS Technical Detailed Water Quality Review Table

Issue/Interest Summary	Suggested Mitigation Measures / Remedies	Expected Implementation Phase
Verify the validity of the groundwater model once additional characterization data is available	as indicated in FEIS and required by the Canadian Nuclear Safety Commission	Pre-construction/construction
The monitoring program in the FEIS is descriptive as appropriate for a feasibility level project description. However, the monitoring program does not include specificity.	Update the groundwater monitoring plan with specifics once the detailed engineering has been completed. Updated monitoring plans should be submitted to the MN-S for review and comment.	Licensing

the decommissioning plan in the FEIS is conceptual. The decommissioning objectives for the mining area exceeds the Metal and Diamond Mining Effluent Regulations	Update the decommissioning plan once detailed engineering and updated groundwater modelling is complete. Update decommissioning objectives with updated data and maintain baseline water quality in Whitefish Lake. Include all base metal parameters in geochemical modelling. Submit the draft decommissioning plan to the MN-S for review and comment.	Licensing
The adaptive management plan in the FEIS is general.	Update the adaptive management plan once detailed engineering and updated groundwater modelling is complete. Include measurable criteria. Submit the adaptive management plan to the MN-S for review and comment.	Licensing

APPENDIX E: Woodland Caribou Technical Review

Review of Woodland Caribou Effects Assessment for the Denison Mines' Wheeler River Project: Final Environmental Impact Statement

Prepared by:

Vanessa Sadler, Neve Environmental

Martin Gebauer, Gebauer & Associates Ltd.

September 27, 2025

Background

The Denison Mines' Wheeler River Project is located in the SK1 Boreal Shield conservation unit for the boreal population of Woodland Caribou (*Rangifer tarandus ssp. caribou*). The SK1 range is uniquely characterized by high levels of natural disturbance (primarily wildfire) and low levels of anthropogenic activity^{6,7}. Anthropogenic disturbance appears to have a stronger negative effect on population condition and should be maintained at or below 5% while maintaining a minimum of 40% undisturbed habitat⁶.

The SK1 range planning process began in December 2023. Once finalized, the range plan is expected to meet or exceed the goals of the federal amended Recovery Strategy⁶. The 2019 Canada-Saskatchewan Conservation Agreement states that in the absence of range plans, ECCC will recommend habitat and mitigation offsetting guidelines, which was provided to the Project by ECCC in 2025⁸.

Final Environmental Impact Statement Review

A Final Environmental Impact Statement (FEIS) was submitted for review in November 2024. The FEIS identifies Woodland Caribou as a focal species and provides an overview of existing conditions based on data collected through Indigenous Nation engagement, literature review, and baseline studies. Woodland Caribou and suitable habitat are present within the Project areas, and the FEIS assesses potential Project-related effects through an evaluation of habitat alteration and/or loss and changes in direct and indirect mortality.

The FEIS concludes that with implementation of mitigation measures, the Project would not result in any residual effects on Woodland Caribou population integrity from alteration/loss of available habitat or change in mortality. Further, no significant cumulative effects were predicted from Project interactions with other projects and activities. A preliminary Caribou Management Framework provides a high-level overview of mitigation measures being considered to minimize Project effects on Woodland Caribou; however, the Framework does not provide quantifiable details regarding habitat reclamation, offsetting goals, monitoring, and adaptive management thresholds and feedback loops.

While the FEIS does meet the Project's TOR, the following concerns were identified during the conformity review:

- The limited extent of the RSA, which prevents a comprehensive assessment of potential Project effects on Woodland Caribou within their range.

⁶ 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.

⁷ Saskatchewan Ministry of Environment. 2023. Woodland Caribou in the Boreal Shield (SK1): Background Information. Saskatchewan MOE. Regina, SK.

⁸ Environment and Climate Change Canada (ECCC). 2025. Preparing an Offsetting Plan for Woodland Caribou, Boreal Population.

- The lack of quantifiable detail regarding habitat reclamation and offsetting goals, which prohibits an effective assessment of potential residual and cumulative effects.
- The minimal amount of information on monitoring protocols and hierarchy of mitigation that will be triggered in response to different scenarios (i.e., adaptive management) precludes an effective assessment of potential residual and cumulative effects.
- The determination that the Project will have no significant residual or cumulative effects on Woodland Caribou or their habitat is based on an insufficient level of detail to confirm that proposed mitigation measures are adequate.
- The evaluation of potential cumulative effects from neighbouring projects on Woodland Caribou does not take into consideration exploration of the Gryphon deposit.

These concerns, which have been detailed in a separate spreadsheet (see attachment), identify a moderate risk to Woodland Caribou conservation from the proposed Project.

Review of CNSC Assessment

The CNSC determined that the Project is not likely to cause significant adverse effects if identified mitigation measures and recommended follow-up programs are implemented. Specifically, Environmental Assessment (EA) Condition 3 states that Denison will develop a Woodland Caribou mitigation and offset plan consistent with the federal amended Recovery Strategy, and EA Condition 5 states that Denison will provide finalized follow-up program details for monitoring adverse effects on listed wildlife species and their critical habitat over the lifecycle of the Project. While commitment to these conditions is important, the limited details currently provided in the FEIS prohibit an adequate assessment of the extent of residual and cumulative effects on Woodland Caribou. Specifically, quantifiable details for habitat reclamation, offsetting goals, monitoring, and adaptive management thresholds are required to conduct a defensible assessment, as is an RSA that is more reflective of the range of Woodland Caribou.

Given these deficiencies, the CNSC conclusions that the Project will not result in residual and cumulative effects, is premature. The conclusions are explicitly contingent on future, outstanding documentation and only valid when EA Condition 3 and Condition 5 are implemented properly – and Denison Mines has not demonstrated they will. Potential Project-related effects cannot be adequately assessed without more detailed information.

Review of Commitment Register

The Commitment Register⁹ (CR) summarizes commitments made by Denison Mines in the FEIS, during the provincial and federal EIS review process, and to the public and Indigenous Nations and communities through the engagement process. This conformity review ensures commitments specific to mitigating potential effects on Woodland Caribou are captured in the CR. The following commitments made by Denison Mines are not presented in the CR.

Commitment	FEIS Commitment Details
Environmental Management System (EMS)	Prohibit employee and contractors from hunting within the Project Area. Prohibit feeding, approaching, and/or harassing wildlife. Focus lighting on work sites and not surrounding areas to minimize sensory disturbance of wildlife.

⁹ Denison Mines Corp. 2024. Commitments Register. Version 5.

	<p>Maintain appropriately sized gaps in the roadside snowbanks during winter to facilitate wildlife crossing and escape, reducing risk of vehicle collisions.</p> <p>Implement a “no littering policy” in the Project Area.</p> <p>Design the new Project site and access roads to minimize sightlines for predators, whenever practicable, while maintaining general road safety.</p> <p>Implement species at risk pre-clearance sweep survey methodology (i.e., at least seven days prior, within a 100 m buffer).</p>
Wildlife Education	<p>Provide wildlife education and awareness training, including review of mitigation and offsetting measures for Woodland Caribou in EMS and CMF.</p> <p>Report Woodland Caribou observations to on-site staff, and monitor and record encounters.</p>

* Also referred to as a Caribou Mitigation Plan in the FEIS

To further strengthen the traceability and audibility of the Project’s commitments, requirements mandated by the CNSC (i.e., EA Condition 3 and 5) and commitments made to Indigenous Nations should be added to the CR.

Recommendations

The FEIS provides considerable information on Woodland Caribou presence and habitat availability; however, the RSA is of insufficient extent, and the proposed mitigation measures lack the details necessary to conduct a comprehensive assessment of potential residual and cumulative effects. Furthermore, while the Project adds limited anthropogenic disturbance at the SK1 scale, any disturbance to Woodland Caribou and their habitat requires rigorous, specific plans and offsets to mitigate effects and align with goals of the amended federal Recovery Strategy¹⁰. Residual and cumulative effects on Woodland Caribou should be reevaluated in the context of a larger RSA and with quantifiable mitigation measures and offsets.

Attach. FEIS Technical Detailed Woodland Caribou Review Table

**Métis Nation within Saskatchewan
Self-Government Recognition and
Implementation Agreement**

-between-

Métis Nation - Saskatchewan

-and-

**His Majesty the King in Right of Canada as
represented by the Minister of Crown-Indigenous Relations**

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PREAMBLE

WHEREAS:

- A. Canada's historic relationships with Indigenous Peoples have been steeped in colonialism and successive governments have failed to acknowledge and respect the inherent rights of Indigenous Peoples, including their rights in relation to land, their distinct governments, their customary laws, traditions, and unique cultures;
- B. The Métis—an Indigenous People—emerged in the historic North-West with its unique multilingualism, its own collective identity, territory, laws, legal orders, self-government, institutions, national symbols, culture, arts, customs, way of life, and relationships to the land and other Indigenous Peoples prior to Canada's westward expansion;
- C. The Supreme Court of Canada has recognized that the Métis are one of the "[I]ndigenous peoples who were living in the western territories" prior to Canada's westward expansion after Confederation, and that this pre-existence gives rise to Métis Rights, interests, and claims that engage the honour of the Crown and the process of reconciliation mandated by section 35 of the *Constitution Act, 1982*;
- D. A "Métis" means a person who self-identifies as Métis, is distinct from other Aboriginal peoples, is of Historic Métis Nation ancestry and who is accepted by the Métis Nation", with the following defined terms applying to this definition:
 - i. "Historic Métis Nation" means the Aboriginal people then known as Métis or Half-breeds who resided in the Historic Métis Nation Homeland;
 - ii. "Historic Métis Nation Homeland" means the area of land in the west-central North America used and occupied as the traditional territory of the Métis or Half-breeds as they were then known;
 - iii. "Métis Nation" means Aboriginal people descended from the Historic Métis Nation, which is now comprised of all Métis Nation Citizens and is one of the "aboriginal peoples of Canada" within the meaning of section 35 of the *Constitution Act, 1982*; and
 - iv. "distinct from other Aboriginal peoples" means distinct for cultural and nationhood purpose;
- E. The Métis Nation shares a history that encompasses the exercise of the inherent right to self-determination, including the right of self-government, over the generations, which exercise is comprised of, among other things:

- i. the 1815 rallying of Métis forces from along the Saskatchewan River Corridor culminating in the first military display of the red infinity flag at Fort John (on the Qu'Appelle River in present day Saskatchewan);
 - ii. on June 1, 1816, the seizure of Brandon House by Métis forces under the blue infinity flag;
 - iii. on July 18, 1816, the Battle of Seven Oaks (also known to the Métis as the Victory of the Frog Plain or *la Victoire de la Grenouillère*);
 - iv. the Métis buffalo hunt brigades governed by the Métis Nation's "Laws of the Buffalo Hunt" that spanned the historic North-West;
 - v. the Red River Resistance leading to the establishment of a first Provisional Government and the negotiation of the *Manitoba Act, 1870* to address Métis interests within the postage stamp province of Manitoba;
 - vi. the petitioning by Métis collectivities in response to the imposition of colonial laws and settlements on Métis land; and
 - vii. in 1885, the North-West Resistance, including the establishment of a second Provisional Government, the Battle of Duck Lake, the Battle of Fish Creek, and the Battle of Batoche, in what would become Saskatchewan, led to the execution of Louis Riel by Canada and the implementation of the Métis Scrip System to attempt to address Métis claims to land;
- F. Specifically, the Métis Nation within Saskatchewan has a history that encompasses the exercise of its inherent right to self-determination, including self-government, over generations, which exercise is comprised of, among other things, the following events:
- i. the first military display of the red infinity flag at Fort John after the 1815 rallying of Métis forces along the Saskatchewan River Corridor;
 - ii. political action and assertions by Métis collectivities throughout Saskatchewan in response to the imposition of colonial laws and settlement on Métis lands;
 - iii. in the early 1930s, the Métis Nation in southern Saskatchewan organized to address issues pertaining to the Métis Scrip System and Métis claims to land, and they formed the "Half-Breeds of Saskatchewan" to represent Métis interests in southern Saskatchewan;
 - iv. at the same time, the Métis Nation within Saskatchewan founded the Saskatchewan Métis Society to address issues pertaining to Métis poverty, lack of education, lack

- of employment, land displacement, and hunting issues in southern and central Saskatchewan, and by 1939, there were over 20 community-based representative structures, known as Locals, in rural and urban centres throughout Saskatchewan;
- v. in 1964, the Métis Nation within Saskatchewan formed the Métis Society of Saskatchewan to represent the Métis in southern and central Saskatchewan, and the Métis Association of Saskatchewan to represent the Métis in northern Saskatchewan and non-status Indians;
 - vi. in 1967, the Métis Society of Saskatchewan and the Métis Association of Saskatchewan merged, retaining the name of the Métis Society of Saskatchewan;
 - vii. in 1975, the Métis Society of Saskatchewan was restructured as the Association of Métis and Non-Status Indians of Saskatchewan;
 - viii. in 1988, the Association of Métis and Non-Status Indians of Saskatchewan held a referendum to limit its membership to citizens of the Métis Nation within Saskatchewan only, which referendum passed and the organization returned to the name of the Métis Society of Saskatchewan;
 - ix. in 1993, the Métis Nation within Saskatchewan passed its Constitution, which defines the Métis Nation within Saskatchewan as a people, sets out the MN-S's core values and laws, and details the mechanisms of the MN-S as the democratic government of the Métis Nation within Saskatchewan; and
 - x. since 1993, the MN-S has amended its Constitution and enacted legislation, such as the *Citizenship Act, 1999*, to supplement its Constitution, in furtherance of its role as the democratic government of the Métis Nation within Saskatchewan;
- G. As a continuation of the Métis Nation within Saskatchewan's exercise of its inherent right to self-determination, including self-government, the collectivity has, among other things:
- i. created, developed, and evolved the MN-S as a Métis Nation Government;
 - ii. established democratic governance structures and institutions at the local, regional, and provincial levels through the MN-S to represent the Métis Nation within Saskatchewan;
 - iii. established fair, transparent, and objectively verifiable systems to identify and register citizens of the Métis Nation within Saskatchewan;
 - iv. developed, adopted, and enforced its own laws, policies, and decisions that are grounded in its pre-existing legal orders, customs, and practices;

- v. maintained relationships with other governments, including Canada, Saskatchewan, other Métis Nation Governments, and other Indigenous governments;
 - vi. incorporated the Métis Nation – Saskatchewan Secretariat Inc. to act as its legal and administrative arm in response to requirements set by other governments in order to administer policies and programs, to facilitate funding arrangements, and to establish intergovernmental relations;
 - vii. advanced and participated in litigation to defend Métis Rights, interests, and claims in Saskatchewan; and
 - viii. mandated the MN-S to negotiate a modern-day treaty relationship and other agreements with the Crown through a “land claim agreement” within the meaning of subsection 35(3) of the *Constitution Act, 1982*;
- H. Despite the Métis context and history set out above, and the established nature of the MN-S’s role as the Métis Nation Government mandated by the Métis Nation within Saskatchewan to represent Métis Rights, interests, and claims, other governments and Canadian law have often denied Métis Rights, interests, and claims in Saskatchewan and across Canada, including the MN-S’s role and mandate, which denial has been identified by the Supreme Court of Canada in *Alberta (Aboriginal Affairs and Northern Development) v. Cunningham*, 2011 SCC 37, as a “legal lacuna” in which governments and Canadian law “[remain] blind to the unique history of the Métis and their unique needs”;
- I. In 1982, through Métis political advocacy and organization by the MN-S and other Métis representatives, section 35 was added to the *Constitution Act, 1982*, which recognizes and affirms the “existing aboriginal and treaty rights of the aboriginal peoples of Canada” and the Métis’ status as one of the “aboriginal peoples of Canada”;
- J. In response to the Métis context and history set out above, and Canada’s longstanding recognition of the MN-S as the Métis Nation Government mandated by the Métis Nation within Saskatchewan to represent their Métis Rights, interests and claims, Canada has engaged in formal negotiations with the MN-S in respect of self-determination and self-government matters and has reached a series of agreements in respect of the same;
- K. In 2019, Canada recognized upon signing the MGRSA that the “Métis of Saskatchewan” has the inherent right to self-government that is recognized and affirmed by section 35 of the *Constitution Act, 1982*, which right is protected by section 25 of the *Canadian Charter of Rights and Freedoms*; that the MN-S is mandated to represent the “Métis of Saskatchewan”; and that the MN-S has been mandated by the “Métis of Saskatchewan” to

implement the collectivity's inherent right to self-determination, including the right of self-government;

- L. In 2021, Canada enacted the *United Nations Declaration on the Rights of Indigenous Peoples Act* to “affirm the Declaration as a universal international human rights instrument with application in Canadian law,” and to “provide a framework for the Government of Canada’s implementation of the Declaration”; and
- M. This Agreement consolidates and confirms the common understandings reached between the Parties, contemplates Implementation Legislation to recognize the Métis Government in Federal Law, and sets out commitments, criteria, and a process for negotiations to recognize the Métis Nation within Saskatchewan’s self-government in a Treaty.

NOW THEREFORE the Parties agree to the following:

CHAPTER 1: DEFINITIONS

1.01 In this Agreement:

“**Aboriginal Peoples**” has the meaning of “aboriginal peoples of Canada” as defined in subsection 35(2) of the *Constitution Act, 1982*;

“**Agreement**” means this Self-Government Recognition and Implementation Agreement, including the Preamble, as amended from time to time;

“**Authority**” means any power other than Jurisdiction;

“**Canada**” means His Majesty the King in Right of Canada, unless it is otherwise clear from the context;

“**Citizen**” means an individual:

- (a) who meets the criteria for citizenship as set out in the Constituting Documents or in a Métis Government Law; and
- (b) whose name is included on the Registry;

“**Constituting Documents**” means the Métis Government's Constitution and legislating documents;

“**Constitution**” means the constitution recognized in and as contemplated in subsection 5.02(h), as amended from time to time;

“**Declaration**” means the United Nations Declaration on the Rights of Indigenous Peoples;

“**Distinct from other Aboriginal peoples**” means distinct for cultural and nationhood purposes;

“**Effective Date**” means the date on which this Agreement comes into force in accordance with section 20.03;

“**Expenditure Need**” means the estimated cost required to enable the Métis Government to fulfill the responsibilities:

- (a) referred to in section 7.01;
- (b) agreed to in a Supplementary Self-Government Agreement; or
- (c) set out in a Fiscal Arrangement,

based on comparable measures or standards for other governments or other public bodies performing the functions of government to perform similar functions;

“Federal Law” includes federal statutes, regulations, ordinances, Orders in Council, and the common law;

“Fiscal Arrangement” means a mechanism agreed to by the Parties, including an agreement or other measure, that sets out for the duration of the Fiscal Arrangement:

- (a) the federal funding or access to fiscal capacity to be provided by Canada to the Métis Government to meet its Expenditure Need; and
- (b) the responsibilities of the Métis Government in respect of that federal funding or fiscal capacity;

“Framework Agreement” means the Framework Agreement on Advancing Reconciliation signed by the Parties on July 20, 2018;

“Governance Structure” means the governance structures of the Métis Government as set out in its Constituting Documents;

“Historic Métis Nation” means the Aboriginal people then known as Métis or Half-breeds who resided in the Historic Métis Nation Homeland;

“Historic Métis Nation Homeland” means the area of land in the west-central North America used and occupied as the traditional territory of the Métis or Half-breeds as they were then known;

“Implementation Legislation” means the legislation referred to in Chapter 8;

“Indigenous Governing Body” means a council, government, or other entity that is authorized to act on behalf of an Indigenous group, community, or people that holds rights recognized and affirmed by section 35 of the *Constitution Act, 1982*;

“Indigenous Peoples” has the meaning of “aboriginal peoples of Canada” as defined in subsection 35(2) of the *Constitution Act, 1982*;

“Institution” includes:

- a) bodies, entities, organizations, departments, agencies, boards, panels, tribunals, and commissions established under section 6.13;
- b) organizations or entities owned or controlled by the Métis Government; and
- c) trusts, corporations, societies, and cooperatives established in accordance with Federal Law or provincial law, owned or controlled by the Métis Government;

“Jurisdiction” means the law-making power of the Métis Government set out in this Agreement;

“Métis” holds the same meaning as outlined in Preamble clause D;

“Métis Government” means the MN-S or its successor as provided for in its Constituting Documents;

“Métis Government Law” means a law made by the Métis Government, and includes the Constituting Documents, statutes, regulations, ordinances, and orders;

“Métis Government Law Register” means the public database of Métis Government Laws maintained by the Métis Government;

“Métis Nation” means the Indigenous People descended from the Historic Métis Nation, which is now comprised of all Métis Nation Citizens and represented through Métis Nation Governments;

“Métis Nation Citizen” means an individual who:

- (d) self-identifies as Métis;
- (e) is Distinct from other Aboriginal Peoples;
- (f) is of Historic Métis Nation ancestry; and
- (g) is accepted by the Métis Nation;

“Métis Nation Government” means the MN-S and other Métis governments that represent Métis collectivities who are successors to the Historic Métis Nation and together make up the Métis Nation today;

“Métis Nation – Saskatchewan Secretariat Inc.” means the legal entity incorporated under *The Métis Act* for conducting the financial and administrative affairs of the Métis Nation within Saskatchewan, and carrying out its objectives;

“Métis Nation within Saskatchewan” means the Métis collectivity that:

- (a) is comprised of:
 - i. Métis Nation Citizens who are Citizens; and
 - ii. individuals entitled to become Citizens who reside in Saskatchewan and elsewhere inside and outside of Canada, based on their connection to the Metis collectivity within Saskatchewan;
- (b) has chosen to act exclusively through the Métis Government in order to exercise, advance, and address Métis Rights, interests, and claims, and make decisions according to its own laws, policies, customs, and traditions; and
- (c) based on (a) and (b):

- i. is one of the successors of the Historic Métis Nation that together with other Métis collectivities make up the Métis Nation today,
- ii. holds the inherent right to self-determination recognized in the Declaration, and
- iii. possesses Métis Rights;

“Métis Rights” means the constitutionally protected rights of the Métis Nation within Saskatchewan, as recognized and affirmed by section 35 of the *Constitution Act, 1982*;

“Métis Scrip System” means the system established by Canada under its constitutional jurisdiction, responsibilities, and obligations as set out in the *Royal Proclamation of 1763*, the *Constitution Act, 1867*, and the *Rupert’s Land and North-Western Territory Order, 1870*, including the legislative authorities and grants in the *Dominion Lands Act* “[t]o satisfy any claims existing in connection with the extinguishment of the Indian title, preferred by half-breeds resident in the North-West Territories outside of the limits of Manitoba” and to “grant lands in satisfaction of claims of half-breeds arising out of the extinguishment of Indian title” and other related policies or Federal Law enacted and implemented to address Métis land related interests in the Historic Métis Nation Homeland;

“MGRSA” means the Métis Government Recognition and Self-Government Agreement signed by the Parties on June 27, 2019;

“Minister” means the Minister of Crown-Indigenous Relations;

“MN-S” means:

- (a) the Métis Nation – Saskatchewan, including its successor;
- (b) the democratic representative body of the Métis Nation within Saskatchewan, having the responsibility for providing responsible and accountable self-government through its Governance Structures and Institutions as set out in its Constituting Documents; and
- (c) until the Treaty Implementation Date, includes the Métis Nation – Saskatchewan Secretariat Inc.;

“Parties” means

- (a) the MN-S; and
- (b) Canada, as represented by the Minister of Crown-Indigenous Relations;

“Registry” means the standardized and objectively verifiable register of Citizens maintained by the Métis Government referred to in section 6.09;

“Supplementary Self-Government Agreement” means an agreement referred to in section 9.03(d);

“Treaty” means the future self-government treaty referred to in Chapter 9;; and

“Treaty Implementation Date” means the date set out in the Order in Council for the coming into force of the Treaty as provided for in the Implementation Legislation.

CHAPTER 2: INTERPRETATION

- 2.01 The Preamble is an integral part of the consideration of this Agreement, and can be used to provide a description of the nature and background of the relationship between the Parties and as guidance in the interpretation and implementation of this Agreement.
- 2.02 In this Agreement,
- (a) “Aboriginal” and “Indigenous” are synonymous and interchangeable;
 - (b) a reference to a statute includes every amendment to it, every regulation made under it, and any law enacted in substitution for or in replacement of it;
 - (c) unless it is otherwise clear from the context, the use of the singular includes the plural, and the use of the plural includes the singular;
 - (d) unless it is otherwise clear from the context, the use of the word:
 - i. “or” is not exclusive; and
 - ii. “including” is not limiting, whether or not non-limiting language is used with reference thereto;
 - (e) unless this Agreement provides otherwise, or unless it is otherwise clear from the context, the use of the word “will” denotes an obligation that must be carried out as soon as practical after the Effective Date or the event that gives rise to the obligation;
 - (f) words importing the masculine gender will include the feminine and neutral genders and vice versa;
 - (g) words importing persons include corporations; and
 - (h) the table of contents, headings, and subheadings are for convenience only and in no way define, limit, alter, or enlarge the scope or meaning of any provision of this Agreement.

CHAPTER 3: PURPOSE OF THIS AGREEMENT

3.01 The purpose of this Agreement is to:

- (a) recognize, support, and advance the Métis Nation within Saskatchewan's ongoing exercise of its Métis Rights, including its inherent right to self-determination, including the right of self-government, based upon Canada's constitutional responsibility to advance relationships with Aboriginal Peoples and to engage in negotiations to recognize and delineate Métis Rights;
- (b) contribute to the implementation of the Declaration as it relates to inherent right of self-determination of the Métis Government;
- (c) build upon, advance, and supplement the MGRSA by:
 - i. consolidating and confirming the outcomes and common understandings reached between the Parties to date by recognizing the existing self-government of the MN-S, including its role, functions, Jurisdiction, and Authority as set out in this Agreement, prior to the Treaty Implementation Date;
 - ii. committing the Parties to ongoing negotiations with a view to achieving a Treaty that is premised on rights recognition and implementation;
 - iii. providing a foundation for addressing, on a government-to-government basis, the identification, assessment, and resolution of outstanding Métis claims against Canada, including any claims that may relate to the Métis Scrip System; and
 - iv. informing and continuing the existing government-to-government relationship between the Parties.

CHAPTER 4: LEGAL STATUS AND TERM OF THIS AGREEMENT

- 4.01 Upon signing, the Parties are entitled to rely on this Agreement and it:
- (a) is binding on, enforceable, and justiciable between the Parties; and
 - (b) engages the honour of the Crown in its interpretation and implementation.
- 4.02 This Agreement will be construed as to uphold Métis Rights and not to abrogate or derogate from them.
- 4.03 This Agreement is based on a rights recognition approach to section 35 of the *Constitution Act, 1982*, and does not require the extinguishment, modification, or non-assertion of any existing Aboriginal or treaty right.
- 4.04 This Agreement remains in force and effect until it is replaced by the Treaty on the Treaty Implementation Date.
- 4.05 This Agreement is not the Treaty or a “treaty” within the meaning of subsection 35(3) of the *Constitution Act, 1982*.
- 4.06 This Agreement is intended to build on and advance the Parties’ reconciliation efforts and mutual commitments under the Parties’ other written agreements, including the Framework Agreement and the MGRSA.
- 4.07 The commitments made in the Parties’ other written agreements referred to in section 4.06 continue in accordance with their terms, including any funding commitments made by Canada in those agreements.
- 4.08 Provisions in other written agreements referred to in section 4.06 may be relied upon and included in the Treaty at the request of either Party, where relevant and applicable.
- 4.09 This Agreement prevails to the extent of an inconsistency or conflict with other written agreements between the Parties.
- 4.10 The Parties agree they may amend other written agreements referred to in section 4.06 or to address the progress made under this Agreement.

CHAPTER 5: RECOGNITION

- 5.01 The Métis Nation within Saskatchewan is one of the Métis collectivities that together make up the Métis Nation, an Indigenous People that emerged with its own identity, language, culture, institutions, and way of life in the Historic Métis Nation Homeland before Canada's expansion into the historic North-West.
- 5.02 Based on the MN-S' longstanding, democratic and well-developed self-government, Canada's constitutional responsibility to advance relationships with Indigenous peoples pursuant to subsection 91(24) of the *Constitution Act, 1867*, decisions of the Supreme Court of Canada with respect to the Métis and Métis Rights, federal policies and approaches relevant to Indigenous self-determination and self-government, the Parties' other written agreements referred to in section 4.06, and well-established inter-governmental relationship between the Parties, Canada recognizes that:
- (a) the Métis Nation within Saskatchewan is an Aboriginal People;
 - (b) the Métis Nation within Saskatchewan has the inherent right to self-determination that is recognized in the Declaration and the inherent right of self-government recognized and affirmed in the common law and by section 35 of the *Constitution Act, 1982*, which right is protected by section 25 of the *Canadian Charter of Rights and Freedoms*;
 - (c) the Métis Government is the democratic representative government of the Métis Nation within Saskatchewan and has the responsibility for providing responsible and accountable self-government for its Citizens and Métis collectivity throughout Saskatchewan;
 - (d) the Métis Government is the Indigenous Governing Body of the Métis Nation within Saskatchewan;
 - (e) the Métis Government is exclusively mandated to represent the Métis Nation within Saskatchewan based on the authorizations it receives from its Citizens and the Métis collectivity throughout Saskatchewan comprised of those Citizens, in respect of collectively held Métis Rights, interests, and claims, and in particular to:
 - i. implement and exercise the Métis Nation within Saskatchewan's inherent right to self-determination, including the right of self-government,
 - ii. engage in consultation with Canada, and, where appropriate, accommodation where Canada's conduct has the potential to adversely impact Métis Rights within Saskatchewan as the Crown's duty to consult and accommodate may require; and
 - iii. address any outstanding collective Métis claims against Canada, including *Morin v. Canada* or claims that have been identified in the

Framework Agreement or that may be identified in the future by the Parties;

- (f) the Métis Government delivers programs and services to its Citizens and individuals who are eligible to become Citizens, including by maintaining a province-wide delivery infrastructure;
- (g) the Métis Nation within Saskatchewan acts exclusively through the Métis Government, its Governance Structures, and its Institutions in exercising its rights, Jurisdiction, Authority, and privileges and in carrying out its duties, functions, and obligations;
- (h) the Constitution, first adopted and ratified in 1993 and subsequently amended over the years, is the written constitution of the Metis Government; and
- (i) the existing Métis Nation within Saskatchewan system of democratic, responsible, and accountable governance through the Métis Government, including the procedures of governance under its Constitution and Constituting Documents, together with Metis Nation within Saskatchewan policies, conventions, customs, traditions, and laws, as amended from time to time, is the system of governance of the Metis Government.

5.03 The recognition provided for in this Chapter is the outcome of the agreements referred to in section 4.06, including the history, developments, and common understandings set out in the Preamble.

5.04 For greater certainty:

- (a) the Métis Nation within Saskatchewan's inherent right to self-determination, including the right of self-government, is not contingent on Canada's recognition through this Agreement, the Implementation Legislation, the ratification or implementation of the Treaty, or otherwise;
- (b) the Jurisdiction and Authority set out in Chapter 6: is not intended to define conclusively or exhaustively the inherent right to self-determination, including the right of self-government, or any other inherent right, Jurisdiction or Authority that may be recognized, implemented, or exercised through further negotiations between the Parties, or how these rights may ultimately be defined at law; and
- (c) any agreement Canada has concluded with another Indigenous collectivity or group is not intended to affect the geographic scope, Jurisdiction, Authority, or self-government of the Métis Nation within Saskatchewan recognized in this Agreement.

5.05 By entering into this Agreement,

- (a) Canada is not acknowledging that the Métis Nation within Saskatchewan has any particular Aboriginal or treaty rights recognized and affirmed by section 35 of the *Constitution Act, 1982*, other than those referred to in this Agreement; and
- (b) the Métis Government is not acknowledging that the Métis Nation within Saskatchewan's Aboriginal and treaty rights recognized and affirmed by section 35 of the *Constitution Act, 1982* are limited to those referred to in this Agreement.

CHAPTER 6: MÉTIS GOVERNMENT JURISDICTION AND AUTHORITY RELATING TO SELF-GOVERNMENT

Recognition of the Jurisdiction of the Métis Government

6.01 Subject to section 6.22, between the Effective Date and the Treaty Implementation Date:

- (a) Canada will not challenge or support a challenge to a Métis Government Law made under the Jurisdiction set out in this Chapter on the basis of an assertion that the Métis Nation within Saskatchewan does not have the inherent right to self determination, including the right of self-government, or that the Métis Government does not have Jurisdiction in respect of that subject matter; and
- (b) the Métis Government will not assert that this Agreement provides any additional force of law to Métis Government Laws made under the Jurisdiction set out in this Chapter to that which may exist under the common law, Federal Law, and section 35 of the *Constitution Act, 1982*.

6.02 By entering into this Agreement:

- (a) Canada is not acknowledging that the Métis Government has Jurisdiction in respect of any particular subject matter other than those set out in this Chapter, including, in particular, criminal law and procedure, intellectual property, and official languages of Canada; and
- (b) the Métis Government is not acknowledging that its Jurisdiction is limited to the subject matters set out in this Chapter.

Métis Government Citizenship

- 6.03 The Métis Government has Jurisdiction and Authority in relation to Métis Government citizenship, including citizenship criteria, registration, and appeal or review of decisions about the determination of Métis Government citizenship.
- 6.04 Métis Government Laws made under section 6.03 will, subject to sections 6.05 to 6.08, provide that every individual who meets the eligibility criteria set out in that Métis Government Law is entitled to be a Citizen.
- 6.05 Nothing in this Agreement may be construed so as to deny the ability of an individual who is or may be entitled to be a Citizen from choosing instead to be a member, citizen or participant in another Indigenous collectivity or government, including another Metis Nation Government, in accordance with the eligibility requirements of those collectivities or governments.
- 6.06 For greater certainty, the individual choice of a Métis Nation Citizen with respect to who represents them at a given time does not negate or undermine the recognition, Jurisdiction, or Authority of the Métis Government.

- 6.07 Subject to section 6.08, Métis Government Laws made under section 6.03 will not provide for citizenship to any individual who would otherwise be eligible for citizenship but who is:
- (a) enrolled on the register or list of another Indigenous government, including another Métis Nation Government that is recognized by Canada through a concluded self-government agreement with Canada:
 - i. that is protected by subsection 35(3) of the *Constitution Act, 1982*; or
 - ii. that is not protected by subsection 35(3) of the *Constitution Act, 1982*, to which the Métis Government or the Métis Nation within Saskatchewan is not a party;
 - (b) on a Band list or on the Indian Register maintained under the *Indian Act*; or
 - (c) on a list of members maintained by a Band in accordance with its membership rules established in accordance with the *Indian Act*.
- 6.08 Métis Government Laws made under section 6.03 may provide that an individual referred to in section 6.07 is entitled to be listed in the Registry as a Citizen if the individual is unable to revoke their membership or participation in the other Indigenous collectivity or group.
- 6.09 The Métis Government will maintain a Registry that includes the names of its Citizens.
- 6.10 Citizens who are Canadian citizens or permanent residents of Canada continue to be entitled to all the rights and benefits for which they would otherwise be eligible as Canadian citizens or permanent residents of Canada.
- 6.11 Registration as a Citizen does not confer Canadian citizenship or permanent residency and does not confer or deny any rights of entry into Canada.

Selection of Métis Government Representatives

- 6.12 The Métis Government has Jurisdiction and Authority in relation to the method of selection of the representatives of the Métis Government and the methods of selection of members, directors, or officers of any of its Institutions.

Structures, Operations, Procedures, Assets, and Financial Management

- 6.13 The Métis Government has Jurisdiction and Authority in relation to its:
- (a) structure, including the establishment of Institutions;
 - (b) operations and procedures;

- (c) assets; and
- (d) financial management and financial accountability.

6.14 The Métis Government will continue to rely on and operate in accordance with Saskatchewan's laws in relation to labour relations and working conditions.

Accountability

6.15 The Métis Government has Jurisdiction and Authority in relation to its accountability to its Citizens, including establishing measures to report to and inform Citizens and to prevent conflicts of interest of its representatives.

Voluntary Settlement of Disputes

6.16 The Métis Government has Jurisdiction and Authority in relation to the voluntary settlement of disputes between Citizens, and in particular may provide services, including restorative justice or mediation services.

Administrative Bodies

6.17 The Métis Government has Jurisdiction and Authority in relation to the establishment of administrative bodies, offices or Institutions to administer, enforce, and adjudicate Métis Government Laws made by the Métis Government in respect of a subject matter set out in this Chapter.

Child and Family Services

6.18 Canada recognizes that the Métis Government is an Indigenous Governing Body for the purposes of *An Act respecting First Nations, Inuit and Métis children, youth and families*, and has jurisdiction, including legislative authority, in relation to child and family services to administer and enforce laws made thereunder.

6.19 Nothing in section 6.18 prevents any Supplementary Self-Government Agreement or the Treaty from including provisions in respect of child and family services that are different from those in an *Act respecting First Nations, Inuit and Métis children, youth and families*.

Included Authority

6.20 The Jurisdiction and Authority of the Métis Government in respect of a subject matter set out in this Chapter includes Jurisdiction and Authority to do all other things as may be necessary, incidental, or ancillary to exercising its Jurisdiction and Authority.

Application of the Charter and Federal Laws

6.21 If the Implementation Legislation receives royal assent and it provides for the recognition of the Métis Government and its mandate and roles prior to the Treaty Implementation

Date, the *Canadian Charter of Rights and Freedoms* will apply to the Métis Government and all of its Institutions established under section 6.13 consistent with the common law and with due regard to section 25 of the *Canadian Charter of Rights and Freedoms*.

- 6.22 Federal Law applies to the Métis Government and its Institutions established under section 6.13, except as otherwise provided for in this Agreement.
- 6.23 The Treaty will include provisions addressing the Jurisdiction and Authority of the Métis Government, including in respect of the relationship of laws and conflict rules.

Registry of Métis Government Laws

- 6.24 The Métis Government will maintain a Métis Government Law Register and post Métis Government Laws in English and in any other language at the discretion of the Métis Government, including Michif or Cree.

Collection and Disclosure of Information

- 6.25 The Métis Government has Jurisdiction and Authority in relation to:
 - (a) the collection, retention, accuracy, disposal, use, or disclosure of information about an identifiable individual by the Métis Government and any Institutions established under section 6.13; and
 - (b) access to information in the custody or under the control of the Métis Government and any Institutions established under section 6.13.
- 6.26 The Parties may enter into agreements to address the collection, protection, retention, use, disclosure, and confidentiality of personal, general, or other information.
- 6.27 For the purposes of the *Access to Information Act* and the *Privacy Act*, information that the Métis Government provides to Canada in confidence will be deemed to be information received or obtained by Canada in confidence from a provincial government.
- 6.28 Canada may provide information to the Métis Government in confidence if the Métis Government has enacted a Métis Government Law or has entered into an agreement with Canada as contemplated in section 6.26, in accordance with which the confidentiality of the information will be protected.
- 6.29 Where the Métis Government requests disclosure of information from Canada, that request will be evaluated as if it were a request by a provincial government.
- 6.30 Notwithstanding section 6.28, Canada is not required to disclose any information to the Métis Government:
 - (a) that Canada is required to withhold under any Federal Law;

- (b) that is confidentially disclosed to another government; or
- (c) if it may be withheld in accordance with the *Canada Evidence Act* or under a privilege at law.

6.31 Notwithstanding any other provision of this Agreement, where a Federal Law allows the disclosure of certain information only if specified conditions for disclosure are satisfied, Canada is not required to disclose that information to the Métis Government unless those conditions are satisfied.

6.32 Notwithstanding any other provision in this Agreement, the Métis Government is not required to disclose information that it may withhold:

- (a) under a Métis Government Law, except if such information relates to a contractual or other requirement as part of a Fiscal Arrangement or other fiscal agreement with Canada, in which case the terms of that Fiscal Arrangement or agreement will apply; or
- (b) under a privilege at law.

Delegation

6.33 The Métis Government may delegate any of its Jurisdiction and Authority to:

- (a) its Governance Structures;
- (b) its Institutions;
- (c) Canada;
- (d) another Indigenous government in Canada; or
- (e) any other legal entity in Canada with prior written notice to Canada.

6.34 Any delegation of Jurisdiction or Authority under section 6.33 will be:

- (a) made in such a manner so as to retain accountability to Citizens;
- (b) in writing and agreed to by the Governance Structure, Institution, Indigenous government, or other legal entity in Canada; and
- (c) revocable by the Métis Government.

6.35 The Métis Government may enter into written agreements to receive Jurisdiction or Authority by delegation from another government or legal entity in Canada.

CHAPTER 7: FISCAL MATTERS

- 7.01 The ongoing financing of the Métis Government is a shared responsibility of the Parties and the Parties will work together to enter into and maintain Fiscal Arrangements that:
- (a) are intended to ensure that the Métis Government has access to sufficient fiscal resources to meet its Expenditure Need; and
 - (b) advance the goals of:
 - i. Citizens having equal opportunities for well-being to those of other Canadians,
 - ii. achieving and maintaining equity in socio-economic outcomes between Citizens and other Canadians,
 - iii. supporting the political, social, economic, and cultural development of the Métis Nation within Saskatchewan,
 - iv. the Métis Government having the means to preserve, protect, use, develop, and transmit the language, culture, and heritage of Citizens, the Métis Nation within Saskatchewan, and the Métis Nation, including the past, present, and future manifestations of that culture, and contributing to the revitalization of Michif; and
 - v. Citizens having access to public programs and services that are reasonably comparable to those available to other Canadians in similar circumstances; and
 - (c) take into account:
 - i. the population and geographic distribution of Citizens within Saskatchewan served by the Métis Government,
 - ii. the unique and distinct structure of the Métis Government as established and operated from time to time,
 - iii. other unique cultural features or traditional decision-making institutions or practices of the Métis Government; and
 - iv. the desirability that Fiscal Arrangements should be reasonably stable and predictable over time, while providing sufficient flexibility to address changing circumstances.
- 7.02 Upon signing this Agreement, the Parties will work together to reach a fiscal financing agreement to satisfy the requirements of section 7.01 and address, among other things:

- (a) the Métis Government's responsibilities under this Agreement, a Supplementary Self-Government Agreement, fiscal financing agreement, or the Treaty contemplated under Chapter 9;
 - (b) how transfer payments from Canada to the Métis Government will be calculated and made, including:
 - i. if, how, and in what circumstances the own-source revenues or own-source revenue capacity of the Métis Government will be considered; and
 - ii. the manner in which transfer payments may be adjusted during the term of the fiscal financing agreement;
 - (c) procedures for resolving disputes related to the implementation or interpretation of the fiscal financing agreement;
 - (d) the process for the amendment, extension, renewal, or replacement of the fiscal financing agreement;
 - (e) the term of the fiscal financing agreement;
 - (f) reporting requirements; and
 - (g) any other provisions agreed to by the Parties.
- 7.03 The Parties may agree to replace a fiscal financing agreement with another Fiscal Arrangement.
- 7.04 Except as expressly provided for in this Agreement, nothing in this Agreement and no exercise of Jurisdiction or Authority set out in this Agreement will be interpreted as creating a financial obligation or service responsibility for either Party.
- 7.05 Any payments required for the purposes of a Fiscal Arrangement are subject to an appropriation by the Parliament of Canada for those purposes.
- 7.06 Except as otherwise provided in this Agreement, nothing in this Agreement affects other funding arrangements in force between the Parties.

CHAPTER 8: PURPOSE, TIMING AND CONTENT OF LEGISLATION

Timing of Legislation

- 8.01 As soon as practicable after the Effective Date and before concluding the Treaty, the Minister will recommend the introduction of the Implementation Legislation in the Parliament of Canada.

Content of Legislation

- 8.02 The Minister will recommend that the Implementation Legislation includes:
- (a) the following purpose and objectives:
 - i. advancing the longstanding goal of the Métis people for recognition of their unique identity, culture, and governance on a nation-to-nation, government-to-government basis;
 - ii. contributing to the implementation of the Declaration;
 - iii. recognizing the Metis Nation within Saskatchewan's inherent right to self-determination, including, the right of self-government protected by section 35 of the *Constitution Act, 1982*, and the Métis Government's mandate and role in representing the Métis Nation within Saskatchewan;
 - iv. providing a legislative framework to give legal force and effect to the Treaty contemplated by this Agreement;
 - (b) provision for the following to take effect upon royal assent of the Implementation Legislation:
 - i. affirmation of the Métis Nation within Saskatchewan's inherent right to self-determination, including the right of self-government recognized and affirmed by section 35 of the *Constitution Act, 1982*;
 - ii. confirmation that the Métis Government is exclusively mandated to represent, advance and deal with the rights, interests and claims of the Métis Nation within Saskatchewan, including the right of self-government;
 - iii. recognition that the Métis Government is the democratic representative of the Métis Nation within Saskatchewan with the responsibility for providing responsible and accountable self-government based on the roles, responsibilities and duties set out in its Constituting Documents or Constitution;

- iv. confirmation that the Métis Government is the Indigenous Governing Body that represents the Métis Nation within Saskatchewan; and
 - v. the Implementation Legislation is binding on the Crown.
- (c) provision for the following to take effect on the Treaty Implementation Date:
- i. the Treaty will be approved, given effect, declared valid, and have the force of law, is a treaty within the meaning of sections 25 and 35 of the *Constitution Act, 1982*, and will be binding on, and may be relied on by, all persons or bodies; and
 - ii. a person or body has the powers, rights, privileges, and benefits conferred on the person or body by the Treaty and must perform the duties and is subject to the liabilities imposed on the person or body by the Treaty;
- (d) provision for a Supplementary Self-Government Agreement to be declared as having the force of law, be binding on, and may be relied on by all persons or bodies upon issuance of an Order in Council providing for such; and
- (e) such other matters that the Parties agree should be addressed in the Implementation Legislation.

Introduction of the Implementation Legislation

- 8.03 Before the Minister recommends the introduction of the Implementation Legislation to the Parliament of Canada, the Minister will ensure the Métis Government supports the proposed Implementation Legislation.
- 8.04 If the bill proposing the Implementation Legislation is introduced to the Parliament of Canada but does not receive Royal Assent because:
- (a) a session of the Parliament of Canada has ended, the Minister will reintroduce the bill in the following session, or as soon as practicable; or
 - (b) it is defeated in the Parliament of Canada, the Parties will forthwith negotiate and seek to reach agreement on any necessary amendments to this Agreement or discuss any necessary changes to the Implementation Legislation in order to obtain Royal Assent of the Implementation Legislation and, subject to section 8.03, the Minister will introduce the amended Implementation Legislation on a timely basis.

Amendments to the Implementation Legislation

- 8.05 Before the Minister recommends an amendment to the Implementation Legislation to the Parliament of Canada after it has received Royal Assent, the Minister will ensure the Métis Government supports the proposed amendment.

CHAPTER 9: THE TREATY

- 9.01 The Parties are committed to ongoing negotiations with a view to reaching a Métis Nation within Saskatchewan self-government Treaty within two years after the Effective Date, consistent with the purpose of this Agreement and protected within the meaning of section 35 of the *Constitution Act, 1982*.
- 9.02 The Treaty will provide that the MGRSA and this Agreement are superseded by the Treaty, and the Parties agree the Treaty will be the basis for their relationship as of the Treaty Implementation Date.
- 9.03 The Treaty may include provisions of this Agreement and the MGRSA, adapted as may be agreed to by the Parties, and will address:
- (a) the Jurisdiction and Authority of the Métis Government, including matters related to the relationship of laws and conflict rules, including the application of the *Canadian Charter of Rights and Freedoms* and Federal Laws;
 - (b) the legal status and capacity of the Métis Government, including its Governance Structures at the local, regional, and provincial levels, and its Institutions established under section 6.13, as provided for within the Constitution;
 - (c) a process for amending the Treaty;
 - (d) provisions for the negotiation of Supplementary Self-Government Agreements;
 - (e) the tax treatment of the Métis Government, its Governance Structures, and its Institutions through a tax treatment agreement;
 - (f) matters identified in the Intergovernmental Relations Agreement, as contemplated by Chapter 18 of the MGRSA, including:
 - i. Canada's international legal obligations, including a process of collaboration to ensure that Canada is able to comply with its international legal obligations;
 - ii. dispute resolution and other intergovernmental relations matters;
 - iii. the Jurisdiction and Authority of the Métis Government in relation to the enforcement and adjudication of Métis Government Laws; and
 - iv. a mutually agreeable Treaty implementation plan;

- (g) ratification of the Treaty through a process that will be set out by the Métis Nation within Saskatchewan in a ratification plan, aspects of which will be set out in the Treaty; and
- (h) such other matters as may be agreed by the Parties.

9.04 If the Treaty is not ratified, or if the Parties cannot agree on the terms of the Treaty, within two years after the Effective Date, the Parties will review this Agreement to consider what, if any, amendments to this Agreement should be made in accordance with section 15.01.

CHAPTER 10: TREATY IMPLEMENTATION REQUIREMENTS

10.01 The Parties agree that the following requirements must be met before the Treaty Implementation Date:

- (a) the Métis Government has a Constitution;
- (b) the Treaty has been ratified by the Métis Nation within Saskatchewan based on the processes set out in the Treaty;
- (c) the Treaty has been signed by the Parties;
- (d) the Parties have signed:
 - i. a tax treatment agreement in relation to the tax treatment of the Métis Government, its Governance Structures, and its Institutions and any other tax related matters agreed to by the Parties;
 - ii. a fiscal financing agreement as contemplated in Chapter 7; and
 - iii. a Treaty implementation plan.
- (e) the Parties have agreed on the Treaty Implementation Date;
- (f) the Order in Council referred to in the Implementation Legislation has been made.

10.02 The requirements for the implementation of the Treaty, including matters related to ratification set out in this Agreement, replace and supersede the requirements set out in Chapter 5 and Articles 23.01 and 23.02 of the MGRSA.

CHAPTER 11: OBLIGATIONS AND IMPLEMENTATION

The Honour of the Crown

- 11.01 The Parties agree that the honour of the Crown applies to all aspects of their relationship, including the application, interpretation, and implementation of this Agreement.
- 11.02 The Parties will act honourably and in good faith in the implementation of this Agreement.
- 11.03 The implementation of this Agreement is not contingent on the participation of the Government of Saskatchewan.

Obligation to Negotiate and Funding

- 11.04 The Parties agree to participate in good faith and engage in honourable negotiations to advance the purpose of and the commitments in this Agreement and the agreements referred to in section 4.06.
- 11.05 Canada will provide the Métis Government with funding to participate in the ongoing negotiations between the Parties based on the agreements identified in section 11.04.
- 11.06 Notwithstanding section 11.05, nothing in this Agreement affects the ability of the Métis Nation within Saskatchewan, the Métis Government, its Institutions, or its Citizens from:
 - (a) applying for, bidding on, participating in, or benefitting from programs and services established or provided by Canada or a province for Indigenous People generally or for Métis in particular, in accordance with criteria established for those programs and services from time to time, unless funding for those programs and services has been incorporated into a Fiscal Arrangement or other funding agreement in force between the Parties; or
 - (b) accessing or benefitting from a right they may be constitutionally or legally entitled to as a beneficiary.
- 11.07 Nothing in this Agreement is intended to or will be interpreted as limiting or excluding the Métis Nation within Saskatchewan, the Métis Government, its Institutions, or its Citizens from applying for or bidding on any commercial, economic, or other activity or project for which they would otherwise be eligible.
- 11.08 Nothing in this Agreement is intended to or will be interpreted as limiting or excluding the Métis Government, its Institutions, or its Citizens from applying for, accessing, or receiving provincial funding.

Obligations with Respect to Addressing Outstanding Métis Claims

- 11.09 Canada is committed to working with the Métis Government to support research and better understand, assess, and potentially seek federal mandates to negotiate, address, or resolve outstanding Métis collective claims against Canada, including those related to the Métis Scrip System.
- 11.10 The Parties agree to work together, on a government-to-government basis, to co-develop a process or policy that advances the commitment set out in section 11.09, subject to Canada securing any required federal approvals or authorizations.

CHAPTER 12: NON-DEROGATION, RIGHTS RECOGNITION AND OTHER ABORIGINAL PEOPLES

Non-Derogation and Rights Recognition

- 12.01 This Agreement will be construed as to uphold existing Métis Rights, and not to abrogate or derogate from them.
- 12.02 This Agreement is based on a rights recognition approach to section 35 of the *Constitution Act, 1982*, and does not require the extinguishment, modification, or the non-assertion of any existing Aboriginal or treaty right.

No Effect on Existing or Future Métis Rights, Interests, or Claims

- 12.03 Nothing in this Agreement or the Implementation Legislation extinguishes, defines, creates, modifies, limits, prejudices, restricts, or surrenders:
- (a) any Métis Right or other rights or freedoms protected by section 25 of the *Constitution Act, 1982*, in particular the inherent right to self-determination, including the right of self-government, or any other inherent jurisdiction, right, freedom, interest, or claim, that is held or exercised collectively by the Métis Nation within Saskatchewan or any component thereof, anywhere in Canada; or
 - (b) any constitutional duty or obligation owed by Canada to the Métis Nation within Saskatchewan or any component thereof, anywhere in Canada.
- 12.04 Nothing in this Agreement will be interpreted to limit or exclude a Citizen from benefitting or participating in a settlement related to a Métis claim against Canada.

No Effect or Impact on Other Aboriginal Peoples

- 12.05 Nothing in this Agreement affects, recognizes, or provides any rights recognized and affirmed by section 35 of the *Constitution Act, 1982* of any other Indigenous collectivity or group other than the Métis Nation within Saskatchewan, including any other Indigenous collectivity or group situated within Saskatchewan who are distinct from the Métis Nation within Saskatchewan and not represented by the Métis Government.
- 12.06 If a court of competent jurisdiction finally determines that any Aboriginal People, other than the Métis Nation within Saskatchewan, has rights under section 35 of the *Constitution Act, 1982* that are adversely affected by a provision of this Agreement:
- (a) the provision will operate and have effect to the extent that it does not adversely affect those rights; and
 - (b) if the provision cannot operate and have effect in a way that does not adversely affect those rights, the Parties will make best efforts to amend this Agreement to remedy or replace the provision.

- 12.07 If Canada enters into a treaty or a land claims agreement, within the meaning of sections 25 and 35 of the *Constitution Act, 1982*, with another Indigenous People and that treaty or land claims agreement adversely affects the Métis Rights recognized in this Agreement, Canada will provide the Métis Nation within Saskatchewan with additional or replacement rights, or other appropriate remedies.

CHAPTER 13: NO EFFECT ON THE CONSTITUTION OF CANADA

13.01 This Agreement does not alter the Constitution of Canada in any way, including:

- (a) the distribution of powers as set out in the *Constitution Act, 1867*;
- (b) Métis inclusion in subsection 91(24) of the *Constitution Act, 1867*;
- (c) Métis Right or any right, freedom, interest, or claim of the Métis Nation within Saskatchewan; and
- (d) any constitutional duty or obligation owed by Canada to the Métis Nation within Saskatchewan.

CHAPTER 14: NO FAVOURED MÉTIS NATION GOVERNMENT

- 14.01 Canada is negotiating with Métis Nation Governments that represent various successor collectivities to the Historic Métis Nation that together make up the Métis Nation.
- 14.02 Canada affirms its commitment to treat all Métis Nation Governments it is negotiating with in a fair, equitable, and transparent manner, while respecting the confidentiality of each negotiation and the diversity and unique interests of each Métis Nation Government.
- 14.03 Consistent with the commitment set out in section 14.02, while negotiations for the Treaty are ongoing, Canada will notify the Métis Government in writing if it adopts or implements a new or revised federal policy or technique with respect to rights of Métis, including the inherent right to self-determination and the right of self-government.
- 14.04 Canada will provide notice to the Métis Government, including the relevant information for the Métis Government to understand the new or revised federal policy or technique, within 30 days of making the new or revised federal policy or technique public.
- 14.05 If the Métis Government confirms its interest in writing after receipt of the notice under section 14.04, Canada is committed to negotiating and making amendments to this Agreement and other agreements in place between the Parties to ensure that the Métis Government is able to benefit from new or revised federal policies or techniques.

CHAPTER 15: AMENDMENT

15.01 This Agreement may only be amended with the written consent of the Parties.

15.02 At the request of the Métis Government, Canada agrees to review this Agreement to address:

- (a) any substantial advancements, developments, or benefits arising from jurisprudence related to Aboriginal rights;
- (b) any amendments to Federal Law, other than the common law, that are directly related to the matters set out in this Agreement;
- (c) any changes in federal policy or techniques relating to the matters set out in this Agreement, other than those referred to in section 14.03;
- (d) Canada will notify the Métis Government in writing about any changes in federal policy or techniques referred to in section 15.02(c);
- (e) innovations in any other agreement, including a land claims agreement or treaty, with another Indigenous collectivity or group that includes provisions more favourable than those in this Agreement relating to the matters set out in this Agreement; and
- (f) changes required because of unforeseen circumstances that significantly impact Métis Rights recognized in this Agreement.

CHAPTER 16: INDEMNIFICATION, REPRESENTATIONS, WARRANTIES AND WAIVER

Indemnification

- 16.01 The Métis Government will indemnify and save harmless Canada, its employees, and its agents from any and all claims, demands, actions, and costs whatsoever that may arise directly or indirectly out of any act or omission of the Métis Government, its employees, or its agents in relation to:
- (a) the Métis Government's Authority to represent the Métis Nation within Saskatchewan and to enter into this Agreement on behalf of the Métis Nation within Saskatchewan; and
 - (b) the exercise of any rights, Jurisdiction, Authority, or responsibilities arising from a Métis Government Law that occur between the Effective Date and the Treaty Implementation Date.
- 16.02 Canada will indemnify and save harmless the Métis Government, its employees, and its agents from any and all claims, demands, actions, and costs whatsoever that may arise directly or indirectly out of any act or omission of Canada, its employees, or its agents in relation to Canada's recognition of the Métis Government and its Jurisdiction and Authority set out in this Agreement.
- 16.03 The Party that is the subject of a claim, demand, action, or proceeding that may give rise to liability for which an indemnity is provided in sections 16.01 or 16.02 will:
- (a) defend the claim, demand, action, or proceeding; and
 - (b) not settle or compromise the claim, demand, action, or proceeding except with the consent of the Party that has agreed to indemnify, which consent will not be arbitrarily or unreasonably withheld or delayed.

Representations and Warranties

- 16.04 Canada represents and warrants, with the intent and understanding that the representations and warranties will be relied on by the Métis Government in entering into this Agreement, that it has the authority to enter into this Agreement and that this Agreement is binding on, enforceable, and justiciable between the Parties.
- 16.05 The Métis Government represents and warrants, with the intent and understanding that the representations and warranties will be relied on by Canada in entering into this Agreement, that it has the Authority to enter into this Agreement and that this Agreement is binding on, enforceable, and justiciable between the Parties.

Non-Reliance

- 16.06 Each Party acknowledges that in entering into this Agreement it does not rely on any statement, representation, or warranty other than those expressly set out in this Agreement.

No Implied Waiver

- 16.07 A provision of this Agreement, or the performance by a Party of an obligation under this Agreement, will not be waived unless the waiver is in writing and signed by the Party giving the waiver.
- 16.08 No written waiver of a provision of this Agreement, performance by a Party of an obligation under this Agreement, or a default by a Party of an obligation under this Agreement, will be a waiver of any other provision, obligation, or subsequent default.

CHAPTER 17: JUDICIAL DETERMINATION IN RESPECT OF VALIDITY

- 17.01 If a court of competent jurisdiction finally determines that any provision of this Agreement is invalid or unenforceable:
- (a) the provision will be treated as if it had been severed from this Agreement to the extent of the invalidity or unenforceability;
 - (b) the Parties will do their best to amend this Agreement to remedy or replace the provision; and
 - (c) the rest of the provisions and this Agreement:
 - i. remain in full force; and
 - ii. are to be interpreted, as much as possible, to give effect to the intentions of the Parties.
- 17.02 Neither Party will challenge, or support a challenge to, the validity of any provision of this Agreement.

CHAPTER 18: ASSIGNMENT AND ENUREMENT

Assignment

18.01 Except as otherwise agreed to by the Parties, this Agreement may not be assigned, either in whole or in part, by either Party.

Enurement

18.02 This Agreement will enure to the benefit of and be binding upon:

- (a) the MN-S and its successors, assigns, and agents; and
- (b) Canada, its heirs, successors, and agents.

CHAPTER 19: COMMUNICATIONS AND NOTICE

- 19.01 In sections 19.02 to 19.04, "Communication" includes a notice, document, request, approval, authorization, or consent.
- 19.02 Unless otherwise set out in this Agreement, a Communication between the Parties will be:
- (a) delivered personally or by courier;
 - (b) transmitted by fax, email, or other electronic means;
 - (c) mailed by prepaid registered post in Canada; or
 - (d) communicated by any other means agreed by the Parties.
- 19.03 A Communication will be considered to have been given, made, or delivered and received if:
- (a) delivered personally or by courier, at the start of business on the next business day after the business day on which it was received by the addressee or a responsible representative of the addressee;
 - (b) transmitted by fax, email, or other electronic means and the sender receives confirmation of the transmission, at the start of business on the business day after the day on which it was transmitted;
 - (c) mailed by prepaid registered post in Canada, when the postal receipt is acknowledged by the addressee; or
 - (d) communicated by any other means, received on a date agreed to by the Parties.
- 19.04 If no other address for delivery of a particular Communication has been provided by a Party, a Communication will be delivered, mailed to the addressee, or transmitted to the fax number or email address of the intended recipient as set out below:
- For: Canada
Attention: Minister of Crown-Indigenous Relations
10 Wellington Street
Gatineau, Quebec K1A 0H4
Fax: 819-953-4941
- For: MN-S
Attention: President's Office

310 20th Street East
Saskatoon, Saskatchewan S7K 0A7
Email: office.ceo@mns.work

- 19.05 A Party may change its physical address, fax number, email address, or other delivery method by giving written notice of the change to the other Party.

CHAPTER 20: SIGNING OF THIS AGREEMENT AND EFFECTIVE DATE

Signing of this Agreement

- 20.01 This Agreement will be signed by the Parties after:
- (a) approval from the MN-S authorizing the President to sign this Agreement on behalf of the Métis Nation within Saskatchewan; and
 - (b) approval from the federal Cabinet authorizing the Minister to sign this Agreement on behalf of Canada.

Counterparts

- 20.02 This Agreement may be signed in one or more counterparts. A signed counterpart may be delivered to the other Party by fax, by email, or by other electronic means in portable document format (“PDF”) and a fax, an email, or PDF so transmitted will constitute an original document. Signed counterparts held by a Party, taken together, will constitute one and the same instrument.

Effective Date

- 20.03 This Agreement comes into force upon signing by both Parties in accordance with section 20.01.

THIS AGREEMENT IS SIGNED in Edmonton, Alberta, Canada on February 24, 2023.

**HIS MAJESTY THE KING IN RIGHT
OF CANADA as represented by the
Minister of Crown-Indigenous Relations**



The Honourable Marc Miller

Signed in the presence of
Witness


Witness

**THE MÉTIS NATION -
SASKATCHEWAN as represented by its
President and Vice President**


Glen McCallum, MN-S President


Michelle LeClair, MN-S Vice President

Signed in the presence of:


Witness


Witness