



CMD 25-H9.7

Date: 2025-10-22

**Written Submission from
Susan O'Donnell**

**Mémoire de
Susan O'Donnell**

In the matter of

À l'égard de

Denison Mines Corporation

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

Denison Mines Corporation

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

Commission Public Hearing

Audience publique de la Commission

December 2025

Décembre 2025

October 22, 2025

Canadian Nuclear Safety Commission
by email: interventions@cnsccsn.gc.ca

Re: Wheeler River uranium mine project

Dear commissioners,

I read the report: "A review of environmental considerations related to the Wheeler River Project" prepared for Mining Watch Canada and the Sierra Club Canada Foundation. The Wheeler River Project would constitute the first-ever use in Canada of in situ leaching, or in situ recovery, to extract uranium from an ore body.

This report raised a number of substantive concerns about the proposed project. I will point to only one, the **concern expressed by Indigenous Nations and communities about contamination of water both below and above ground**. This concern was raised in the EA that notes: "worry about the future water quality for Whitefish Lake, Russell Lake, Wheeler River, Geikie River, and Wollaston Lake" (p. 228 of 613). The Mining Watch Canada report found that these concerns are justified.

My research project CEDAR recently co-published a report with the Passamaquoddy Recognition Group, Inc. outlining a range of concerns that Indigenous nations have with nuclear projects. Concerns about the potential impacts of nuclear projects on water is central to many interventions over the years to the CNSC and many statements made by Indigenous communities.

I urge the Commissioners to fully investigate these concerns expressed by Indigenous communities about the Wheeler River project and remember that many members of Indigenous communities are water-keepers. They are often the last line of defense to ensure that water remains free from toxic elements harmful to life and that our country maintains a sustainable water resource for future generations.

Sincerely,



Susan O'Donnell, PhD
Adjunct Research Professor
Principal Investigator, CEDAR project
Sustainability and Environmental Studies
susanodo@stu.ca