



Northern Village of Ile-a-la Crosse

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Introduction

This document provides the comments of the Northern Village of Île-à-la-Crosse ("Île-à-la-Crosse") on the draft Environmental Impact Statement (the "EIS") for the proposed Rook I Project (the "Project") submitted by NexGen Energy Ltd. ("NexGen"), and as requested by the Canadian Nuclear Safety Commission ("CNSC").

The Rook I Project is a proposed new uranium mining and milling operation that is 100% owned by NexGen. It is located adjacent to Patterson Lake in the southern Athabasca Basin in northern Saskatchewan, approximately 320 km north of Île-à-la-Crosse, and 80 km south of the former Cluff Lake Mine site.

Île-à-la-Crosse is in the boreal forest of northwest Saskatchewan, on a peninsula on the western shore of Lac Île-à-la-Crosse. Île-à-la-Crosse is a historic and contemporary Métis community. According to the 2021 Census, the population of Île-à-la-Crosse is 1425 with 98.95% and 72.98% of the population identifying as Indigenous and Métis, respectively.

The scope of this document is specifically limited to the exclusion of Île-à-la-Crosse from the Local Priority Area as identified in the EIS in section 1.2.3 and the exclusion of our Métis People: Île-à-la-Crosse as a Metis Community for full engagement as identified in Table 1.2-1: Primary Indigenous Groups Identified in Relation to Rook I Project Engagement ("Table 1.2-1").

Exclusion of Île-à-la-Crosse from the Local Priority Area

Section 1.2.3 of the EIS explains that during early engagement with local Indigenous Groups and communities, NexGen undertook a process to identify a Local Priority Area (the "LPA"), which would consist of "the local communities closest to the Project that would experience most of the Project effects and for which NexGen would prioritize local training, employment, and business opportunities."

The EIS further states that the LPA communities are located along or accessed via Highways 155 and 955, but limits the LPA to communities located north of the intersection of Highways 155 and 925 (the "Cut-off Point"). As such, Île-à-la-Crosse is not listed as a community within the LPA.

Île-à-la-Crosse is not satisfied with its exclusion from the LPA. Historically, all communities in northwest Saskatchewan on the Highway 155 corridor have participated in engagement related to uranium mining projects in northwest Saskatchewan, and the EIS does not satisfactorily explain NexGen's rationale for changing and revised the Cut-off Point from the area which has

historically been used and applied. This newly established arbitrary Cut-off Point specifically excludes Île-à-la-Crosse without any logical or reasonable rationale.

According to the EIS, the criteria for determining whether a community falls within the LPA is proximity to the Project and the impact of the Project on the community.

In terms of proximity, it should be noted that Île-à-la-Crosse was considered an impact community and was engaged on the Cluff Lake Mine project and that the Rook I Project is approximately 80 km closer to Île-à-la-Crosse as compared to the Cluff Lake Mine Project. Furthermore, Île-à-la-Crosse is only 52 km away from the Cut-off Point and only 64.5 km from the Northern Village of Buffalo Narrows, which has been included in the LPA.

With regards to the potential impact upon the community, the exclusion of Île-à-la-Crosse within the LPA will cause extreme and severe economic and community hardship. There is limited access to training and education and limited employment and business opportunities within or near Île-à-la-Crosse and by including communities as part of the LPA which are so close in proximity and excluding Île-à-la-Crosse, many of the residents will relocate and leave Île-à-la-Crosse in order to fall within the LPA in pursuit of educational and employment opportunities. This mass exit of community members will have both short and long term negative and lasting impacts.

Additionally, the EIS already identifies the various impacts the Project will have on Highway 155, which includes, increased volume of traffic, congestion, noise, debris, vibrations, pollution as well as the movement of dangerous goods. As Highway 155 is the only access road for Île-à-la-Crosse, clearly all of these factors will have an impact upon Île-à-la-Crosse and its residents.

Given the foregoing, we see no logical reason or rationale for specifically excluding Île-à-la-Crosse from the LPA and the establishment of the new Cut-off Point, as compared to the historic engagement area.

Île-à-la-Crosse requests that it be added and included in the LPA.

Exclusion of Our Métis People: The Historical Métis Community of Île-à-la-Crosse

The EIS identifies several Indigenous groups and communities for full engagement (“**Primary Indigenous Groups**”) and our Métis People: Île-à-la-Crosse has been specifically excluded.

The EIS explains that the communities were determined based on several factors, including, *inter alia*, their potential to be affected by or to influence the Project, their proximity to the Project, their traditional territory, and their level of interest expressed in the Project. In Table 1.2-1, a list “Rationale” has been provided for identifying a group for full engagement or information sharing, *inter alia*, as follows:

- proximity to the Project;
- potential land use in proximity to the Project;
- potential overlap with traditional territory;
- increased Project-related traffic;

- participation in engagement relation to the Cluff Lake operation; and
- previous engagement with the CNSC on uranium mining/milling projects in Saskatchewan

In reviewing Table 1.2-1 we believe that the following Rationales would equally, if not more so, apply to our Métis People: Île-à-la-Crosse in comparison to the included Metis Communities: Proximity to the Project; Potential land use in proximity to the Project; Potential overlap with traditional territory; and increased Project-related traffic.

Our historical Métis Community: Île-à-la-Crosse is approximately 320km from the Project in terms of proximity, making it closer than or equal to two of the other Primary Indigenous Groups, and closer to the Project than all the “other Indigenous Groups” identified in the EIS.


The EIS already identifies the issues and impacts in terms of potential land use in proximity to the Project, potential overlap with traditional territory and increased Project-related traffic, all of which would equally, if not more so, apply to our historical Métis Community: Île-à-la-Crosse.

Île-à-la-Crosse is not satisfied with the exclusion of our historical Métis Community as a Primary Indigenous Group.

Summary

Île-à-la-Crosse is not satisfied with its exclusion from the Local Priority Area and the exclusion of our Métis People as a Primary Indigenous Group identified for full engagement. Île-à-la-Crosse has historically been engaged on mining projects in northwest Saskatchewan, is in close proximity to the Project, and will be impacted by the Project. Île-à-la-Crosse therefore requests that the LPA be expanded to include Île-à-la-Crosse and the Métis People of Île-à-la-Crosse be identified as a Primary Indigenous Group.

Sincerely;


Duane Favel
Mayor