

Item #	Source	Number	<b>Comment Excerpts</b> (all original submissions can be found on the <a href="#">Canadian Impact Assessment Registry, reference #80178</a> )	<b>CNSC Response</b>
1.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-1	<p>Residents of the Athabasca Basin are traditional land users that rely on hunting, fishing and trapping to support both their families and communities with traditional and country foods. Protection of the ecological systems that support traditional land use activities are of critical importance. Protection of the aquatic environment and its associated fish species will continue to be critically important to community members throughout the duration of the Wheeler River Project. The aquatic environment and its associated ecosystem support an important food source to all people in the Athabasca Basin.</p> <p>All efforts should be made to engineer water management system for the project site that minimizes fresh water intake by reusing and recycling water on-site whenever possible.</p> <p>Any water that is released in the form of effluent must be closely monitored to ensure it's in a suitable condition to be returned to the surrounding water systems. All water related monitoring results should be made available for review on a regular basis, and easily accessible.</p> <p>Ya'thi Néné looks forward to learning more details about the proposed treated effluent discharge location, the pipeline, release point, and modelled results of changes to the aquatic environment.</p>	<p>As per the Canadian Nuclear Safety Commission's (CNSC) <a href="#">Generic Guidelines for the Preparation of an Environmental Impact Statement pursuant to the Canadian Environmental Assessment Act, 2012</a> (the Guidelines), the proponent's Environmental Impact Statement (EIS) will have to identify and assess all potential environmental effects of the project, including effects to the aquatic environment, and propose mitigation measures to undertake to avoid or minimize any adverse environmental effects to the project.</p> <p>The proponent will also have to develop a follow-up program plan to test environmental assessment effects predictions, assumptions and mitigation actions. This plan will include field-testable monitoring objectives, and include a schedule for effects monitoring.</p> <p>As per the Guidelines, it is CNSC staff's expectation that the proponent consider input from the public and potentially affected Indigenous groups on the EIS, including the effects assessment on the aquatic environment and follow-up program. In addition, as part of the CNSC's EA process, Indigenous groups and members of the public will have the opportunity to comment on the draft EIS. CNSC staff encourages Ya'thi Néné to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p>
2.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-2	<p>Due to the remoteness of the site, it is encouraged that Denison recycle and reuse as many materials as possible during all phases of the operation. Waste management programs will decrease the amount of materials being sent to the domestic landfill, while also decreasing the environmental footprint of the Project.</p> <p>Ya'thi Néné recommends that Denison consider composting food scraps and other organic material instead of the proposed incineration option.</p>	<p>CNSC staff have noted this request, and shared with the proponent for their consideration. In reviewing this comment, the proponent has confirmed that opportunities to minimize wastes will be considered in the EIS. The proponent has also indicated that composting will be evaluated based on the success of similar projects at other northern sites.</p> <p>In addition, it is CNSC staff's expectation that the proponent consider these elements within their EIS.</p>

3.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-3	<p>Ya'thi Néné appreciates the opportunity to review and provide comments on the Wheeler River Project Description and request to participate in the Environmental Assessment development and Indigenous engagement process.</p> <p>Ya'thi Néné requests to remain updated on project schedules and timelines in order to keep community leadership and members informed regarding development.</p>	<p>CNSC staff are committed to ongoing consultation and engagement with Ya'thi Néné and the communities they represent in relation to this proposed project and will be providing information updates directly to Ya'thi Néné at key points in the regulatory process. CNSC staff has sent letters of notification to Ya'thi Néné and the Athabasca Dene communities providing information about the project and the regulatory process. CNSC staff also conducted a follow-up phone call with Ya'thi Néné to answer questions and ensure they were aware of the opportunity to comment on the project description.</p> <p>In addition, as part of the EA process, Indigenous groups and members of the public will have the opportunity to comment on the draft EIS. Indigenous groups and members of the public will also be given the opportunity to review CNSC staff's EA Report and submit comments to the Commission for an eventual EA/Licensing hearing as a Commission Member Document (written intervention and/or oral presentation). CNSC staff encourages Ya'thi Néné to participate throughout all these regulatory steps, should Ya'thi Néné be interested. CNSC staff will continue to engage with Ya'thi Néné (on behalf of the communities they represent) throughout the regulatory process to ensure that they are meaningfully involved and to continue to build a long term meaningful relationship with Ya'thi Néné and the Athabasca Dene communities.</p>
4.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-4	<p>Ya'thi Néné believes it is important to be engaged on the topic of decommissioning as it directly relates to restoring natural process and traditional ways of life to the land, water, air, and ecosystems. Ya'thi Néné is of the opinion that the successful decommissioning of the Wheeler River Project site will only be achieved through a collaborative approach with industry and community groups working together with the shared goal of returning the land back to a pre-development state.</p> <p>Traditional land users from the Athabasca Basin will have valuable insights when developing a plan to return the site to a state free of access restrictions and suitable for recreational and traditional land use.</p>	<p>The environmental assessment (EA) for this proposed project will consider the entire lifecycle of the project, including the decommissioning phase. Further information on the proposed decommissioning activities will be provided in greater detail in the EIS.</p> <p>As outlined in CNSC's Guidelines, it is CNSC staff's expectation that the proponent consider input from potentially affected Indigenous groups and members of the public on the EIS. In addition, as part of the CNSC's EA process, Indigenous groups and members of the public will have the opportunity to comment on the draft EIS. CNSC staff encourages Ya'thi Néné to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p>

			Ya'thi Néné looks forward to learning more about the proposed decommissioning and remediation of the mining chamber at the Wheeler River Project.	<p>CNSC staff will be working collaboratively with the Ya'thi Néné in order to ensure that they are meaningfully involved in the EA process.</p> <p>The CNSC recognizes an important aspect of the EA review process is Indigenous and public engagement to not only help inform the Commission regarding potential concerns in relation to the proposed project, but to lead to better outcomes. CNSC staff encourage Indigenous groups and members of the public, including the Ya'thi Néné (on behalf of the communities they represent), to continue to participate in the project review process.</p> <p>As outlined in <i>REGDOC-3.2.2, Indigenous Engagement</i>, it is CNSC staff's expectation that the proponent continue to engage with potentially affected Indigenous groups.</p>
5.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-5	<p>Ya'thi Néné realizes that the planned size of the Wheeler River Project site is relatively small in comparison to other mine sites in the region, however there is always opportunities to find planning efficiencies to minimize all potential terrestrial impacts.</p> <p>It is recommended that Denison proactively plan to optimize the footprint of the Wheeler River Project site to reduce its impact on the terrestrial environment.</p>	<p>In accordance with the Guidelines, the proponent's EIS will have to identify and assess all potential environmental effects of the project, including effects to the terrestrial environment, and propose mitigation measures to undertake to avoid or minimize any adverse environmental effects to the project.</p> <p>As outlined in the Guidelines, it is CNSC staff's expectation that the proponent consider input from potentially affected Indigenous groups and members of the public on the EIS, including the effects assessment on the terrestrial environment. In addition, as part of the CNSC's EA process, Indigenous groups and members of the public will have the opportunity to comment on the draft EIS. CNSC staff encourages Ya'thi Néné to participate in all steps of the regulatory review process, including providing comments on the draft EIS.</p>
6.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-6	Traditional land use maps and local accounts of trap lines and hunting areas should be considered when surveying areas for potential sensitive species, and species at risk. A collaborative surveying approach between Denison and local traditional land users has the potential to yield the most accurate results regarding areas of sensitive and at-risk species.	CNSC staff acknowledges the importance of working with and integrating Indigenous Knowledge (IK) alongside western scientific and regulatory information in its assessments and regulatory processes, where appropriate and when authorized by Indigenous communities. Indigenous ways of knowing and cultural context enhance the CNSC's understanding of potential impacts of projects and strengthens the rigour of project reviews and regulatory

			<p>Ya'thi Néné is in the process of reviewing our traditional land use maps that will demonstrate land use activities around the Wheeler River Project site.</p>	<p>oversight. CNSC staff is committed to collaborating with Ya'thi Néné to incorporate IK into the EA process, where appropriate and with the consent of the Athabasca Dene communities.</p> <p>As outlined in <i>REGDOC-3.2.2, Indigenous Engagement</i>, it is CNSC staff's expectation that the proponent considers gathering and working with IK as part of their project design and regulatory review process. It is CNSC staff's expectation that the proponent works directly with Indigenous communities and knowledge holders on gathering, incorporating and reflecting IK in their project design, operations, reports and monitoring, where appropriate. It is CNSC staff's expectation that the proponent provides updates on these activities in future iterations of their Indigenous Engagement Report. In addition, CNSC staff appreciate and look forward to receiving and working with any relevant land use maps and information from the Ya'thi Néné in relation to the Denison Wheeler River Project.</p>
7.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-7	<p>It should be noted that the Wheeler River Project site will be subject to the CNSC's Independent Environmental Monitoring Program. The information obtained from these monitoring programs help Ya'thi Néné inform community members of environmental activity and associated monitoring at various Project sites.</p> <p>Traditional land users will want to participate in the environmental monitoring programs and community members will want to be informed of results. The Independent Environmental Monitoring Program is a critical step in developing trust and a meaningful understanding of Project activities for community members.</p>	<p>The CNSC is committed to being a trusted and transparent regulator and the Independent Environmental Monitoring Program is one tool that is used to communicate the status of the environment around CNSC's regulated facilities to the public. It should be noted that the Wheeler River Project is not currently included in the CNSC's Independent Environmental Monitoring Program, as it is still only a proposed project. Should the Commission approve of the EA and then issue a licence for the project, it is the CNSC's expectation that Denison would carry out environmental monitoring per CNSC requirements, and that the proponent would consider collaboration with Indigenous groups and communities.</p> <p>Furthermore, there is also independent sampling performed as part of the Eastern Athabasca Regional Monitoring Program which is co-funded by the CNSC, the Province of Saskatchewan and industry. The Eastern Athabasca Regional Monitoring Program has a community monitoring program that relies on the participation of community members for the selection of sampling locations and sample collection. Participation in the Eastern Athabasca Regional Monitoring Program is another way for community members to develop an understanding of the status of the environment.</p>

				Should the project obtain the necessary approvals then these programs would be a consideration to further explore.
8.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-8	<p>There are many positive socio-economic opportunities that come with a new uranium mine site development, and Ya'thi Néné anticipates to see as many of these benefits made available to Basin owned businesses and residents as possible.</p> <p>Denison should contract local and community owned businesses for site related services and employ residents from Athabasca Basin with defined employment objectives.</p> <p>It is highly recommended that Denison make a proactive commitment of hiring a certain percentage of its workforce from the Athabasca Basin communities during all phases of the project lifecycle. The economy in northern Saskatchewan is dominated directly or indirectly by natural resources and mining. Therefore, these industries generate economic opportunities for the people of the region and are critical to the overall financial sustainability of the area. The creation of effective training and education programs would positively benefit all organizations involved in the Wheeler River Project.</p>	<p>With respect to positive, direct, socio-economic considerations, this comment is not within the scope of this EA as it is not a requirement under <i>Canadian Environmental Assessment Act, 2012</i> (CEAA 2012) and is not within the scope of the CNSC's mandate.</p> <p>However, the consideration of direct, socio-economic impacts is within the scope of the EA for this project that is required under the <i>Saskatchewan Environmental Assessment Act</i>. As such, the proponent will provide detailed information regarding socio-economic impacts (both positive and negative) within the EIS to meet the provincial EA requirements.</p>
9.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-9	<p>Denison has committed to, "Continue engagement with Indigenous groups currently practicing traditional land use activities in the Project area throughout the EIA, feasibility and design stages" (Denison Mines Corp., 2019). The Wheeler River Project site is located within the Traditional Treaty 10 territory of Hatchet Lake First Nation and adjacent to the Treaty 8 territory of Black Lake First Nation and Fond du Lac First Nation. As part of a Collaboration Agreement, Ya'thi Néné works with both Hatchet Lake and Wollaston Lake, Fond du Lac and Black Lake as well as the northern communities Uranium City, Camsell Portage and Stony Rapids, on a variety of environmental and socio-economic projects. As such, Ya'thi Néné requests to be added to the list of Indigenous Stakeholder Groups, and formally engaged on all aspects of the Wheeler River Project as there will be direct impacts to communities located within the Athabasca Basin.</p>	<p>As outlined in <i>REGDOC-3.2.2, Indigenous Engagement</i>, it is CNSC staff's expectation that proponents engage with Indigenous groups whose Indigenous and/or treaty rights may be adversely impacted by the project. CNSC staff expects to be kept informed of the proponent's Indigenous engagement activities in subsequent versions of their Indigenous Engagement Report.</p> <p>In addition, CNSC staff are committed to ongoing consultation and engagement with Ya'thi Néné and the communities they represent in relation to this proposed project and will be working collaboratively with the Ya'thi Néné in order to ensure that they are meaningfully involved in the EA process.</p>

			<p>The environmental, social, and economical impacts of this Project are wide reaching and will impact numerous communities throughout Northern Saskatchewan, with particular emphasis on the Athabasca Basin. For this reason, Ya'thi Néné expects Denison Mines to develop a presence and relationship with Athabasca Basin communities, and to increase engagement efforts with these communities.</p> <p>Ya'thi Néné also wants to ensure there is meaningful participation from Basin communities in the EIA, feasibility, and detailed design stage of the project. These communities are located in proximity to the Project site, and the residents of these communities use the land surrounding the Project site for various traditional purposes. Ya'thi Néné requests that Denison engage with Basin communities to ensure they are meaningfully informed of the Project plans, and have an opportunity to inform Denison of any land use activities that may be occurring near the Project site.</p> <p>Ya'thi Néné looks forward to many meaningful discussions with Denison Mines.</p>	
10.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-10	Ya'thi Néné requests that Denison review cultural programs in place at other mine sites throughout the region in order to develop an effective and inclusive cultural program that can be adopted at the Wheeler River Project site.	CNSC staff have noted this request, and shared with the proponent for their consideration. In reviewing this comment, the proponent has confirmed that as part of ongoing engagement and the EA process, they will review cultural programs in place at other mine sites and engage with Indigenous groups to identify effective cultural support programs that could be implemented at the Wheeler River site.
11.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-11	When planning Indigenous engagement activities, Ya'thi Néné would recommend that a high degree of flexibility be maintained throughout the duration of the engagement process, as timelines and deliverables may change depending on feedback and insights provided from community leadership and members. Ya'thi Néné hopes that Denison will uphold its commitment to respond to enquiries to meet and/or deliver presentations on the Project to informal or formalized groups. The sharing of information and details regarding the Wheeler River Project with Ya'thi Néné and the communities will help community members understand the Project and build support.	CNSC staff are grateful for this feedback and are always looking for input on how to improve engagement activities and processes. As indicated in the response provided to YNLR-6, it is CNSC staff's expectation that the proponent will continue to engage meaningfully with potentially affected Indigenous groups, as will CNSC staff. It is also CNSC staff's expectation that engagement activities need to remain flexible to the group or community in question and that seeking input from those being engaged with will be vital to maintaining and growing the relationships of all parties involved.

12.	<a href="#">Ya'thi Néné Lands and Resource</a>	YNLR-12	<p>Early engagement and relationship building is critical in the development of a beneficial, and collaborative working arrangement between Denison and the communities. However, in order for these conversations to continue throughout the lifecycle of the Project there needs to be adequate funding opportunities available to facilitate meetings, workshops, environmental monitoring, and training. Funding opportunities need to be clearly communicated and widely promoted, particularly to impacted communities. Additionally, there should be a relatively flexible period of time to accept applications and funding proposals.</p> <p>The availability of funding to support land use studies, technical reviews, community workshops, and continued engagement will be beneficial for supporting a long lasting, and positive relationship between Denison, industry regulators and the Athabasca Basin communities.</p>	<p>Beyond consultation that arises from contemplated EA and licensing decisions, CNSC staff are committed to building long-term relationships with Indigenous peoples by pursuing informative and collaborative ongoing interactions with Indigenous groups and organizations who have interests regarding the regulation of nuclear activities and facilities within their traditional or treaty territories.</p> <p>The CNSC has established a Participant Funding Program (PFP) to enhance participation in the CNSC's regulatory processes. Funding for this proposed project will be offered in two phases. The first phase will be for the review of the draft EIS, while the second phase will be for the remainder of the regulatory process. The availability of the first phase of PFP will be announced within the next few months (around the same time as the Commission makes its decision on the scope of the EA). CNSC staff will continue to communicate with Indigenous groups in a timely manner about funding opportunities and will remain flexible on accepting applications and funding proposals. The CNSC is also open to funding additional engagement activities such as meetings with CNSC staff upon request, and encourage Ya'thi Néné to contact CNSC staff for further information.</p> <p>However, it is important to note that CNSC's PFP has limitations and cannot fully fund all potential requests for capacity with respect to participation in the regulatory process, including specific engagement activities with proponents. As indicated in section 4.1 of <i>REGDOC-3.2.2, Indigenous Engagement</i>, it is CNSC staff's expectation that the proponent take into consideration the capacity requirements of Indigenous groups so that they can meaningfully engage in the regulatory process. CNSC staff expect the proponent to provide updates on how they considered the capacity requirements of groups in future iterations of their Indigenous Engagement Report.</p>
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