

Written Submission from  
Ya'thi Néné Land and Resource Office

In the Matter of;  
Denison Mines Corp. Wheeler River Project Description



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## **Introduction**

The Ya'thi Néné Land and Resource Office (Ya'thi Néné), on behalf of the Athabasca First Nations of Black Lake, Fond du Lac and Hatchet Lake, and the municipalities of Camsell Portage, Stony Rapids, Uranium City, and Wollaston Lake, have reviewed the *Wheeler River Project Description*, as submitted by Denison Mines Corp. A summary of comments pertaining to the *Project Description* is contained within the document below. By participating in the *Project Description* review, Ya'thi Néné expects to begin building a positive and long-lasting relationship with Denison Mines Corp. and looks forward to collaborating throughout the lifecycle of this project.

Ya'thi Néné is well informed regarding resource extraction and energy projects located throughout our Traditional Territory in the Athabasca Basin. The organization is mandated to be the interface between industry and community. We interact with various stakeholders and industries to understand and participate in a multitude of current and future projects occurring throughout the Athabasca Basin.

## **Comments**

### **Section 2.0 Project Information**

#### **2.3.6 Water Management and Treatment**

The sustainable and responsible use of water resources should be a top priority for the Wheeler River Project. Residents use the multiple lakes, ponds, and rivers located in proximity to the Project site for a variety of purposes and highly value the environmental protection of water. Community members will want to be assured that water resources are safe and respected. All efforts should be made to engineer a water management system for the project site that minimizes fresh water intake by reusing and recycling water on-site whenever possible.

The proposed ISR mining method and associated on-site processing have the potential to reduce water requirements when compared to other forms of mining. The reduced consumption of water resources helps to minimize the project's impact on the surrounding environment and ecosystems.

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.

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. Ya'thi Néné will review this information when the EIA is published.

#### **2.3.7 Waste Management**

The Project as currently identified includes an on-site domestic landfill planned for non-hazardous materials such as wood and plastics. Ya'thi Néné is interested in reviewing the proposed waste management plan that will detail how each type of waste generated on-site will be managed. 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.

Ya'thi Néné recommends that Denison consider composting food scraps and other organic material instead of the proposed incineration option.

## **2.4 Project Activities and Schedule**

Ya'thi Néné requests to remain updated on project schedules and timelines in order to keep community leadership and member's informed regarding development.

### **2.4.3 Decommissioning**

In order to achieve effective decommissioning and closure of the Wheeler River Project, the end state conditions must be reflective of pre-disturbance conditions and meet designated land use objectives. This process will only occur through proactive engagement and communication with local land users, and the development of the decommissioning plan that has been written in collaboration with all potentially impacted groups. 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.

#### **2.4.3.1 Mining Chamber Remediation**

The decommissioning and remediation of the mining chamber will be a topic of interest for community members, as remediation methods of ISR Projects are thus far untested within Canada. Ya'thi Néné looks forward to learning more about the proposed decommissioning and remediation of the mining chamber at the Wheeler River Project.

#### **2.4.4 Post-Decommissioning**

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.

## **Section 3.0 Project Location**

### **3.0 Project Location**

The Wheeler River Project is located within Treaty 10 Territory, as demonstrated in Figure 3.1: *Wheeler Location within the Treaty 10 Boundary*. Due to the location of the Project, Denison Mine's should be more actively communicating and engaging with Ya'thi Néné given the proximity of the communities to the project site.

## **Section 5.0 Existing Environment**

### **5.4 Aquatic Environment**

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.

### **5.5 Terrestrial Environment**

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. Efficient planning to optimize the movement of heavy vehicles and equipment will help in reducing the footprint of the site. 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.

### **5.6 Species at Risk and Sensitive Species**

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.

### **5.7 Human Environment**

The human environment and its associated economy in northern Saskatchewan is dominated either directly or indirectly by natural resources. A community's ability to meaningfully participate in the socio-economic benefits of a new mine site development will play a critical role in the development of that community's human environment and economic growth. Denison should contract local and community owned businesses for site related services and employ residents from Athabasca Basin with defined employment objectives. 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.

#### **5.7.3 Current Traditional Land Use by Indigenous Communities**

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.

## **Section 6.0 Environmental Effects**

### **6.1.2.2 Traditional Land Use**

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). Ya’thi Néné 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.

### **6.1.2.5 Socio-Economics**

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.

### **6.1.2.6 Indigenous Peoples**

The Wheeler River Project site is located within the Traditional Treaty 10 territory of the 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 formally engaged on all aspects of the Wheeler River Project as there will be direct impacts to communities located within the Athabasca Basin.

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.

## **6.2 Cumulative Effects**

A cumulative effects assessment is required in both the federal and provincial environmental assessment processes. The potential cumulative effects of the Project are wide reaching and complex. There is a vast amount of information and data to review in order to be meaningfully informed of the potential impacts and adaptation methods required to understand and respond to the cumulative effects of the Wheeler River site.

Ya’thi Néné looks forward to reviewing the full report outlining the cumulative effects of the Wheeler River Project in the EIS report.

### **6.3 Monitoring**

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. 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. Ya'thi Néné highly values its relationship with the CNSC and communicates with them regularly on a variety of initiatives.

## **Section 7.0 Stakeholder Engagement**

### **7.4 Socio-Economics**

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.

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.

## **Section 8.0 Engagement with Indigenous Communities**

### **8.1 Identified Communities and Supporting Criteria**

Denison Mines have developed a list of Indigenous Stakeholder Groups identified for engagement throughout the project. This list is outlined in 'Table 8.1: Indigenous Communities' (Denison Mines Corp., 2019). The communities on this list have been engaged with in some aspect and have expressed interest in continual follow-up. Ya'thi Néné requests to be added to the list of Indigenous Stakeholder Groups.

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.

As mentioned in Section 8.1 Indigenous Organizations, "Denison recognizes that these communities may have an interest in the Project and therefore, Denison intends to engage with the YTNLRO in order to better understand contemporary traditional land use activities that are currently being undertaken in

the Project area by the member Indigenous communities of the YTNLRO” (Denison Mines Corp., 2019). Ya’thi Néné looks forward to many meaningful discussions with Denison Mines.

### **8.3 Planned Indigenous Engagement Activities**

As previously identified, Ya’thi Néné requests to be engaged and informed regarding aspects of the Wheeler River Project.

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 enquires 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.

### **Closing Remarks**

The Wheeler River Project is located within the Athabasca Basin and the Traditional Territory of the Athabasca Denesuline First Nations. Ya’thi Néné looks forward to building and maintaining a positive relationship with Denison Mines Corp. as the Project continues to develop. We appreciate 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. Such engagement opportunities are critical to ensure the consistent and timely flow of information from proponents to communities. Ya’thi Néné highly values knowledge sharing and meaningful engagement as it is essential to ensure our community members are meaningfully informed.

We request to remain informed with regards to the in-situ process, and look forward to learning more about the process in the EIA. We believe community members will have a wide variety of questions regarding both the in-situ process and engagement practices, and we would like to be able to deliver to them the most accurate and updated information.

### **Works Cited**

Denison Mines Corp. (2019). *Wheeler River Project*. Saskatoon : Denison Mines Corp.