MN-S Denison Wheeler River Project

Technical Review

Draft Environmental Impact Statement

March 4, 2023

Project No.: 261-04

Prepared For

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Project Name	MN-S Denison Wheeler River Project
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EXECUTIVE SUMMARY

This document summarizes a third-party review of Denison Mines Corp's (Denison) Draft Wheeler River Project (Project) Environmental Impact Statement (Draft EIS). This third-party review was conducted by Okane Consultants (Okane), Kiyano Ventures, and Two Worlds Consulting (TWC) on behalf of Métis Nation-Saskatchewan (MN-S) and considered:

- Reporting consistency and logic;
- Impact assessment and engagement best practices;
- Alignment with regulatory requirements set out for the Project;
- Alignment with Section 35(2) of the *Constitution Act* (1982);
- Alignment with Métis interests under the *1994 Métis Land Claim*, which covers the Project's geographical area and which the Government of Canada and MN-S agreed to address through the *2018 Framework Agreement*;
- Alignment with MN-S' *Duty to Consult and Accommodate Policy and Principles*;
- Acknowledgement and appropriate consideration of potential Project-related effects to MN-S, Northern Region 1 (NR1) communities, and Northern Region 3 (NR3) communities;
- Acknowledgement and appropriate consideration of Métis Knowledge;
- Acknowledgement of legacy resource development impacts to Métis;
- Alignment with the *United Nations Declaration on the Rights of Indigenous Peoples* (UNDRIP) and the Truth and Reconciliation Commission's (TRC) *Calls to Action*; and,
- MN-S' expectations for the Final EIS and Denison's engagement approach going forward.

Métis of Saskatchewan

"The Métis culture will continue to be lived and celebrated when we pass our knowledge on to the generations who follow us" (MN-S 2023 Pg.1)

The MN-S is a democratically elected government that represents Métis citizens across the Métis Homeland in Saskatchewan. MN-S is mandated to implement Métis inherent right to self-determination and falls under the Métis Nation Legislative Assembly (MN-S n.d.). NR1 and NR3 are regional bodies within MN-S that have constitutional structure for the provision of delegated programs and services. Each region within MN-S has a Regional Director and encompasses local, part-time volunteer Métis groups ("Locals") comprising the local councils of Métis communities. Locals are entities that must be consulted.

MN-S works with Locals to support Métis consultation and engagement during the Environmental Assessment process. Consultation and engagement with Métis cannot be limited to Local and Regional governance bodies. The governance structure also requires consultation and engagement with MN-S who are responsible for broader Métis interests.

Métis citizens and communities continue to be affected by past and existing resource development projects. This technical review reflects Métis of Saskatchewan valued interests and expectations.

Engagement

MN-S considers the engagement and consultation record and level of effort as deficient.

In completing the third-party review of Denison's Draft EIS, the following points were taken into account:

- Feedback shared by NR1, NR3, and MN-S based on their legacy experience with other resource development projects in the Métis Homeland.
- 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.
- The Glossary on page 3-iv states that an *Indigenous Community of Interest* is *A community whose traditional land or potential or established Aboriginal and/ or Treaty rights are in proximity to the Project or has existing transportation infrastructure that would be used by the Project. An Indigenous Community of Interest is more likely to experience impacts from the Project.*
- Métis Nation-Saskatchewan principles concerning engagement, consultation, and accommodation (https://metisnationsk.com/land/#duty)
- Core values and best practices established by the International Association for Public Participation (IAP2) (Core Values - International Association for Public Participation).
- Expertise of technical reviewers.

Key issues identified during the third-party review of Denison's Draft EIS related to engagement include:

- Denison definition of Indigenous Community does not meet Métis standards and the Draft EIS does not list MN-S or all NR1 communities and NR3 communities as an Indigenous Community of Interest.
- Denison had limited engagement with MN-S, NR1 Locals, and NR3 Locals in the exploration phase of the Project.
- Denison had limited engagement with MN-S, NR1 Locals, and NR3 Locals in the development of their Draft EIS and related studies.
- Denison has relied on one-way information sharing versus collaborative involvement for the Métis.
- Denison assumed public engagement with Métis attendance was the same as Métis-specific engagement.

To adequately engage NR1 Locals, NR3 Locals, and MN-S in the Project, Denison was expected to create ongoing collaborative Métis involvement opportunities during all phases of the Project including exploration phases. This depth of engagement allows for the development of familiarity with the proposed Project including identifying opportunities at community, technical, and leadership levels. Engagement and consultation were expected to include an exchange of ideas and expectations and meaningful resolution of issues that were identified. Open-houses and information sessions are the most minimal form of engagement and are not considered sufficient.

Project-related Métis engagement needed to be inclusive of all potentially impacted NR1 communities, NR3 communities, and MN-S and separate from all public engagement activities. For example, a public engagement open house event or an Eastern Athabasca Environmental Quality Committee (EQC) meeting with Métis citizens in attendance is not considered to be Métis engagement on the Project. This is especially important because some Métis citizens represent municipalities through their employment and therefore their feedback provided at that time should be considered from their employment/public perspective versus Métis perspective. Métis-specific engagement is the only engagement that MN-S would consider as reliable and valid.

Denison was expected to engage NR1 Locals, NR3 Locals, and MN-S to develop a communication and notification strategy that outlines a process for sharing Project information, valued component identification, and effects resolution and management. This strategy should have been developed jointly with MN-S. See MN-S' *Duty to Consult and Accommodate Policy and Principles* for more information.

Denison was expected to maintain a comprehensive record of contact that meets best practices. The Indigenous Engagement Record of contact should include:

- All phone call and email communications between Denison and/ or NR1 Locals/NR3 Locals/MN-S/Métis citizens
- Summary descriptions of details shared via email
- Summary descriptions of discussions had at meetings or via phone call
- Who attended meetings between Denison and NR1 Locals/NR3 Locals/MN-S/Métis citizens
- Identify any issues/interests shared by NR1 Locals/NR3 Locals/MN-S/Métis citizens during all communications (i.e., phone call, email meetings)
- Identify if phone calls, emails, or meetings fall under Denison's engagement program versus delegated procedural aspects of consultation requirements
- Meetings with NR1 Locals/NR3 Locals/MN-S where issues were discussed related to the proposed Project including project design and efforts to find resolution

The Indigenous Record of Contact should be shared with NR1 Locals/NR3 Locals/MN-S/Métis citizens for review and confirmation after each event.

Denison needs to update the Final EIS to reflect NR1 Locals, NR3 Locals, MN-S' citizens engagement expectations and preferences.

Métis Knowledge and Traditional Land Use

MN-S considers the current Métis Knowledge and Traditional Land Use incorporation to be incomplete.

In completing the review, the following points were taken into account:

- Feedback shared by NR1, NR3, and MN-S based on their legacy experience with other resource development projects in the Métis Homeland.
- The proximate Métis communities to the proposed Project in NR1 and NR3 other than Kineepik Local #9 (Pinehouse).
- Method by which Métis Knowledge / Indigenous Knowledge / Local Knowledge was included in the effects evaluation and best practice standards.
- Expertise of technical reviewers.

MN-S does acknowledge that its Métis Knowledge Study with NR1 and NR3 is in the works and was funded by Denison.

The Métis knowledge incorporation in the Draft EIS is consistent with practices of relating Indigenous Knowledge and Western Science baseline knowledge. The Draft EIS does include a summary of Indigenous Knowledge use in the Draft EIS document (Table 3.5-1) and how it was incorporated. The Draft EIS also includes perspectives on *Lands Taken Up from an Indigenous Perspective* was part of the cumulative effects assessment. While more detail and effort could have been done with effects thresholds from an Indigenous perspective and mitigation creation, the MN-S Métis Knowledge Study can likely assist with expanding on specific points of concern.

MN-S expects to see the inclusion of its Indigenous Knowledge in the Final EIS.

Economic Benefits

MN-S considers the economic evaluation and economic benefits limited

In completing the review, the following points were taken into account:

- Feedback shared by NR1, NR3, and MN-S based on their legacy experience with other resource development projects in the Métis Homeland.
- Expertise of technical reviewers.

The Draft EIS references Employment and Training, Income, Traditional Economy, Government Revenues and Business Opportunities as the valued components. The deficiency highlights are:

- The baseline information for the effects analysis is not the latest information since it does not include that latest information from and survey from Statistics Canada.
- The analysis also lacks an acknowledgement of the effect of Covid-29 in Denison's ambitions for employment and training, and business opportunities and what efforts will be done to counter that effect to maximize benefits.
- Employment and training, and business opportunities are limited benefits and from the text it is unclear how much of this benefit will be left in the north. The plan is only to pick-up in two communities as well as Saskatoon. With over 55% of the positions

requiring highly technical skills, it is likely that these positions will not be found in the north according to the data. Therefore, communities will be left with unskilled labour positions. The short time of the operations will also confine opportunities to advance. Overall, the section offers benefit types but only does limited evaluation of delivery in northern communities.

- Lack of concrete benefits is missing as mitigation in the Economic section. For example, NR1 and NR3 Métis recall early recommendations for revenue sharing to address socio-economic concerns and that further activity not proceed *until a form of revenue sharing, acceptable to the majority of impacted communities, has been agreed upon*[1]. Revenue sharing is not a new idea but it is increasingly part of project approvals packages especially when other benefits are limited. Overall, the section infers that further arrangements are forthcoming, and these will address the limitations of the current mitigation measures.
- The section introduces the idea of local study area (LSA) communities that do not seem to align with earlier Indigenous Community of Interest. This change is unexplained.

The Final EIS needs to include much more detailed analysis of the strength of the benefits to northern communities and alternate means of offsetting impacts and providing benefits that more closely align the Métis aspirations in the 21st century.

Monitoring and Effects Management

MN-S considers Denison's monitoring and effects management plans and programs as deficient.

In completing the third-party review of Denison's Draft EIS, the following points were taken into account:

- Feedback shared by NR1, NR3, and MN-S based on their legacy experience with other resource development projects in the Métis Homeland.
- The consideration of Métis involvement in the Project's monitoring and effects management plans and programs.
- The method by which Métis Knowledge will be used to inform the design of the Project's monitoring and effects management plans and programs.
- Expertise of technical reviewers.

Key issues identified during the third-party review of Denison's Draft EIS related to monitoring and effects management include:

- The monitoring and effects management plans lack detail and still need to be developed.
- The discussion for plans development lacks details on how the Métis will be involved in the development, implementation, and reporting of monitoring and effects management plans and programs.

[1] https://publications.gc.ca/collections/collection_2017/acee-ceaa/En106-21-1993-eng.pdf

- Denison shared during recent meetings with NR1 and NR3 that the Project could use the EQC model for the Project's monitoring and effects management. It needs to be noted that the EQC has lacked Métis involvement to date.
- Denison does not commit to sharing plain language findings of environmental and effects monitoring and maintenance plans and programs with MN-S, NR1 Locals, and NR3 Locals to support the dissemination of these findings at the community-level.
- The Draft EIS does not identify opportunities for Métis-led data collection alongside Denison's biophysical surveying teams. This type of data collection will enhance the Project's environmental and effects management and monitoring plans and programs to better reflect local Métis Knowledge, ways of knowing, and doing.

In the Final EIS, Denison is expected to have completed detailed monitoring and effects management plans that align with adaptive management practices. The plans need to show how NR1 Locals, NR3 Locals, and MN-S were involved in development to be consistent with Section 3 of the Draft EIS and include of Indigenous Knowledge (e.g., data collection alongside Denison's surveying teams). Denison is expected 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. Finally, if the EQC is expected to be part of monitoring, then means need to be put in place to ensure Métis continuing involvement.

Project Design

MN-S considers Denison's mitigations to avoid, or limit identified adverse effects resulting from the Project design as deficient.

In completing the third-party review of Denison's Draft EIS, the following points were taken into account:

- Feedback shared by NR1 Locals, NR3 Locals, and MN-S based on their legacy experience with other resource development projects in the Métis Homeland.
- Potential impacts to Métis as a result of Project design-related effects to the receiving environment.
- Expertise of technical reviewers.

Key issues identified during the third-party review of Denison's Draft EIS related to Project design include:

- The Project design relies on two existing technological processes that have never been used together to extract and process uranium (i.e., in-situ recovery (ISR) and freeze walls).
- The Draft EIS lacks sufficient detail on measures and monitoring to ensure stability through post-decommissioning (e.g., actions to ensure no Project-related effects to water quality during the thawing of the freeze walls).
- The Draft EIS has not considered the benefit of additional source term control(s) instead of focusing on managing contaminants along the pathway before they enter the receiving environment.
- The Draft EIS does not include a Project-specific climate change model database.

- The Draft EIS does not include cumulative effects considerations important to NR1 Locals, NR3 Locals, and MN-S.

The satisfy MN-S, NR1 Locals, and NR3 Locals, Denison is expected to update the Final EIS to include appropriate mitigations to avoid or limit identified adverse effects caused by Project design. Further, the detailed plan development needs to include NR1 Locals, NR3 Locals, and MN-S.

Denison is expected to complete simulations to evaluate the benefit of additional source term control(s) (i.e., actions that control pollutants and prevent contamination) instead of focusing on managing contaminants along the pathway before they enter the receiving environment and include in the Final EIS.

Denison to develop a Project-specific climate change model database, or include in the Final EIS for review.

Finally, the cumulative effects considerations will need to be revised throughout to include input from NR1 Locals, NR3 Locals, and MN-S in the Final EIS.

Aquatic Ecosystems

MN-S considers the assessment of and mitigations to address potential Project-related effects to aquatic ecosystems as deficient.

In completing the third-party review of Denison's Draft EIS, the following points were taken into account:

- Feedback shared by NR1, NR3, and MN-S based on their legacy experience with other resource development projects in the Métis Homeland.
- The method by which Métis Knowledge will be used to inform assessment of potential Project-related effects to the aquatic environment.
- Potential impacts to Métis as a result of Project-related effects to aquatic ecosystems.
- Expertise of technical reviewers.

Key issues identified during the third-party review of Denison's Draft EIS related to aquatic ecosystems include:

- Russell Lake was not identified as a location to monitor fish health. This lake will help detect cumulative effects from the Key Lake operation to fish health.
- Whitefish Lake North is being used as a reference area to monitor fish health. Denison did not identify if there is a physical barrier between Whitefish Lake South and Whitefish Lake North. Without a barrier, fish may move between both lakes and therefore monitoring results will not show if potential effects to fish health are caused by the Project.
- No modelling has been conducted to confirm at the time of decommissioning that there is "large assimilative capacity" of the groundwater system, to manage risk in Whitefish Lake.
- It is unclear if groundwater recharge rates in the Draft EIS were adjusted to account for potential groundwater recharge impacts from climate change.

- Denison assumes it is "conservative" to supply all water for the Project from outside the ore zone and assumes minimal use of recycled / treated water.

Denison is expected to revise the fish and fish habitat section to sufficiently incorporate Métis Knowledge from the MKS in the Final EIS.

Denison is expected to include Russell Lake in the aquatic monitoring program as cumulative effects from the Key Lake operation will be detected in this waterbody.

Denison needs to confirm fish movements between Whitefish Lake North and Whitefish Lake South and if Whitefish Lake North is an appropriate reference lake. If it is not appropriate, then another reference lake such as Kochichowsky Lake may need to be considered.

The Final EIS is expected to sufficiently incorporate Métis Knowledge from the Métis Knowledge Study (MKS) currently being completed.

Terrestrial Ecosystems

MN-S considers the assessment of and mitigations to address potential Project-related effects to terrestrial ecosystems as deficient.

In completing the third-party review of Denison's Draft EIS, the following points were taken into account:

- Feedback shared by NR1, NR3, and MN-S based on their legacy experience with other resource development projects in the Métis Homeland.
- The method by which Métis Knowledge will be used to inform assessment of potential Project-related effects to the terrestrial environment.
- Potential impacts to Métis as a result of Project-related effects to aquatic ecosystems.
- Expertise of technical reviewers.

Key issues identified during the third-party review of Denison's Draft EIS related to terrestrial ecosystems include:

- The terrestrial Regional Study Area (RSA) seems small in consideration of woodland caribou habitat and determining the impacts of the Project to the SK1 caribou population.
- Potential short-term or long-term Project impacts on the overall health of the terrestrial ecosystem are not clearly outlined in the Draft EIS.
- Reliance on non-Indigenous hunter data from the southern portion of the province to inform the Draft EIS assumptions for harvesting numbers and success.
- The duration of habitat changes that may interfere with predator/prey densities was not confirmed in the Draft EIS.
- No rationale was provided on why large terrestrial mammals that are harvested in the Local Study Area (LSA) are not found in sufficient abundance.
- The Draft EIS does not include a moose-specific monitoring and management plan.

Denison, as best practice, should extend terrestrial RSA boundaries in the Final EIS in recognition of the range of SK1 woodland caribou and caribou habitat to better analyze for cumulative effects.

Denison to assess the cumulative impact of all the individual changes to the vegetation on the entire terrestrial ecosystem.

Denison to include Métis harvesting patterns identified in the MKS in the Final EIS.

Denison to work with NR1 Locals, NR3 Locals, and MN-S to co-develop monitoring and effects management plans such as the Woodland Caribou Management Plan.

Denison to co-develop and implement a moose-specific monitoring and management plan with the Métis.

TABLE OF CONTENTS

ABBREVIATIONS

Abbreviations	Name
BC	British Columbia
CEA	cumulative effects assessment
CNSC	Canadian Nuclear Safety Commission
COI	community of interest
COPC	constituent of potential concern
Draft EIS	Draft Environmental Impact Statement
Denison	Denison Mines Corp
EA	environmental assessment
ECCC	Environment and Climate Change Canada
EIS	environmental impact statement
EMS	Environmental Management System
EPP	Environmental Protection Plan
ERFN	English River First Nation
Final EIS	Final Environmental Impact Statement
FPIC	free, prior, and informed consent
GQSC	groundwater quality screening criteria
IK	Indigenous Knowledge
ILRU	Indigenous Land and Resource Use
IPP	Indigenous Peoples Policy
ISR	in situ recovery
KI	Key Indicator
Kiyano	Kiyano Ventures
KML	Kineepik Metis Local #9
KPI	key person interview
LK	Local Knowledge
LSA	Local Study Area
MKS	Métis Knowledge Study
MLTC	Meadow Lake Tribal Council
MN-S	Métis Nation-Saskatchewan
NAD	Northern Administration District
NR1	Métis Northern Region 1
NR3	Métis Northern Region 3
Okane	Okane Consultants
OLRU	Other Land and Resource Use

Abbreviations	Name
PAGC	Prince Albert Grand Council
PML	Patuanak Métis Local
Project	Denison Wheeler River
RAP	Reconciliation Action Plan
RESPEC	RESPEC Company LLC
RSA	Regional Study Area
SK	Saskatchewan
SML	Sipishik Métis Local
SSP	shared socioeconomic pathway
TRC	Truth and Reconciliation Commission
UNDRIP	United Nations Declaration on the Rights of Indigenous Peoples
VC	valued component
YNLR	Ya'thi Néné Lands and Resource Office

HOW TO READ THIS REPORT

Please note authors of this report reference document page numbers, not PDF page numbers.

Please note authors of this report used the arrow bullet to indicate concern(s) with identified EIS quote.

1. INTRODUCTION

Denison Mines Corp (Denison) is proposing to construct, operate, and decommission an *in situ* recovery (ISR) uranium mine and processing plant, the Wheeler River Project (Project), in Métis Homeland. Specifically, the Project is in Métis Northern Region 1 (NR1) with effects into Northern Region 3 (NR3) and is anticipated to last 38 years (Denison 2022).

The Project is subject to a coordinated environmental assessment (EA) process between the Saskatchewan Ministry of Environment's Environmental Assessment and Stewardship Branch, and the Canadian Nuclear Safety Commission (CNSC). The EA is meeting the requirements of both the *Canadian Environmental Assessment Act, 2012* and Saskatchewan's *Environmental Assessment Act* (1980).

On behalf of Métis Nation-Saskatchewan (MN-S), Two Worlds Consulting undertook a third-party review of the Draft Environmental Impact Statement (EIS) with the support of Okane Consultants (Okane) and Kiyano Ventures.

This Technical Review Report ("report") was prepared for submission to the CNSC and documents issues, concerns, and recommendations for the Final EIS.

1.1 Consulting Firms

1.1.1 Two Worlds Consulting (TWC)

TWC is a Canada-wide social and environmental consultancy. We partner with Indigenous Nations, governments, and the private sector to support rigorous process, informed decision-making, and shared prosperity. TWC originated as a Certified Aboriginal Business based in Victoria, BC. Launched by Jennifer Campbell in 2016, TWC has evolved into a thriving consulting firm with reach from coast to coast to coast.

"Guidance with Integrity" is our brand promise and an internal call to action that governs all our work. At TWC, integrity is inherent in everything we do. In our role as project advisors, we use our experience and technical expertise to help project leaders and participants respectfully navigate complex processes, regulatory requirements, and decision-making that yields shared value.

TWC Reviewers

Heidi Klein, MES, reviewed the Project's Draft EIS and supporting documents. Ms. Klein 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.

Eliza Bethune, MPPGA, reviewed the Project's Draft EIS and supporting documents. Ms. Bethune has 5 years designing, executing, and evaluating effective engagement programs for public and private sector clients and Indigenous Nations. Eliza has experience leading and supporting Indigenous, public, and stakeholder engagement programs for oil and gas, mining, road and rail, policy, contaminated sites, aluminum, and infrastructure projects, spanning a variety of regulatory jurisdictions.

Emily DiTomaso, BA, reviewed the Project's Draft EIS and supporting documents. Ms. DiTomaso has over 10 years experience with Indigenous engagement, proponent and stakeholder relations, Indigenous knowledge collection and documentation, environmental assessment, as well as archaeology and heritage management. Her experience includes working in a variety of sectors such as mining, transportation, oil and gas, and renewable energy throughout western Canada within a variety of regulatory jurisdictions.

Daryl Harrison, BA, ADP GIS, reviewed the Project's Draft EIS and supporting documents. Mr. Harrison has over 15 years' experience with resource development, land use planning and environmental assessments. He has contributed to a number of socio-economic impact assessments in western Canada, Ontario, and internationally with a focus on land and marine resource use, visual quality, and socio-community components.

1.1.2 Okane Consultantants (Okane)

Okane helps mining companies to return the land responsibly and safely at the end of a mine's lifecycle. We believe in challenging the status quo and advocate for meaningful partnerships and positive outcomes for community stakeholders and Indigenous rightsholders. Our solutions help our clients achieve positive financial, environmental, and social outcomes from feasibility through to relinquishment.

Okane Reviewers

Mike O'Kane M.Sc., P. Eng. Senior Technical Advisor is the founder of Okane Consultants. Mike works with the company as a senior technical advisor applying technical expertise and knowledge on risk management best practices as tools for development and communication of project objectives and designs. He provides peer review for numerous government and private agencies while also being a member of multiple advisory panels. Mike serves as a director of the Landform Design Institute and chair of its Technical Advisory Panel.

Marty Sangster B.Sc., P.Eng. is a Senior Geotechnical Engineer with 19 years' industry and consulting experience. He is an accredited Professional Engineer in several constituencies in Canada and Australia. Marty's professional experience includes design and construction supervision of mine tailings earthwork structures, numerical modelling for consolidation and slope stability, development of geotechnical sampling, testing, and monitoring programs.

Lachlan Ashby M.Sc. P.Biol is a Senior Scientist and project manager with over 15 years in Australia and Canada. He has an extensive consulting background within the resources and energy industries. His professional experience consists of regulatory engagement, project leadership, technical coordination of environmental studies and specialists, and contaminated site remediation.

1.1.3 Kiyano Ventures (Kiyano)

Kiyano Ventures is an Indigenous-owned joint venture between the Saskatchewan First Nations Natural Resource Centre of Excellence and RESPEC Consulting Inc. Providing services throughout North America, Kiyano specializes in sustainable engagement strategies that combat historical gaps between Indigenous Peoples and the natural resource industry. We support informed decision making through digital data work products such as natural resource mapping, land use and occupancy mapping, impact assessments and other technical reviews backed by subject matter expertise. Kiyano is championing a world in which informed consent, equitable participation, and collaborative capacity building produce sustainable and economic opportunities for Indigenous Peoples.

Kiyano Reviewers:

Sheldon Wuttunee provided Indigenous knowledge and client relations expertise to the project team. As Co-Founder of Kiyano Ventures and President and CEO of the Saskatchewan First Nation Natural Resource Center of Excellence, Sheldon leads and supports 74 First Nations in developing sound decisions regarding the sustainable natural resource development of their lands. Mr. Wuttunee has 25 years of experience in consistently managing, negotiating, and consulting to advance the interests of Saskatchewan Indigenous Peoples across a broad scope of natural resources including oil and gas, uranium, potash, and forestry. He has extensive involvement in the Saskatchewan/Federal Government Duty to Consult processes.

Ms. Debra Shewfelt, M.Sc., P.Geo, provided project management expertise to the EIS review. As Co-Founder of Kiyano Ventures and Co-President, Board member, and Senior Geologist of RESPEC Consulting Inc., Ms. Shewfelt draws on two decades of career experience in the natural resource sector, including flagship Saskatchewan commodities such as potash and uranium. Her work on clean energy and climate projects, as well as impact assessments for rural and remote communities, demonstrate her passion for environmental stewardship and sustainability.

Ms. Sheri Stark, B.Sc., PMP, reviewed the Project's Draft EIS and supporting documents. Ms. Stark has over 15 years in the environment industry. The majority of her experience has been within Saskatchewan, supporting mining projects. These include the uranium mining industry, potash mining and gold mining. She has lead and executed environmental assessments for new mining projects, as well as expansion projects that have triggered the federal and/or provincial environmental assessment processes.

1.2 Documents Reviewed

Denison Mines Corp. "Wheeler River Project Draft Environmental Impact Statement". 2022.

1.3 Methodology

The technical review of the Draft EIS and selection of relevant sections was guided by areas of primary interest to Métis, feedback shared by NR1 and NR3, and letters exchanged between MN-S' Legal Team and the CNSC (**Appendix A**), and available funding. Therefore, the third-party review only focused on 13 Draft EIS sections:

Table 1: Sections Reviewed

Denison Mines – Wheeler River Project Draft Environmental Impact Statement	
1.0 Introduction	9.0 Terrestrial Environment
2.0 Project Description	11.0 Land and Resource Use
3.0 Indigenous and Local Knowledge	12.0 Quality of Life
4.0 Engagement	13.0 Economics
5.0 Approach and Methodology of the Assessment	15.0 Effects of the Environment on the Project
7.0 Hydrogeology	16.0 Assessment Summary and Conclusions
8.0 Aquatic Environment	

Should additional funds be made available, MN-S reserves the right to review the remaining sections of the Draft EIS.

2. WHO ARE MÉTIS

Métis are distinct peoples that emerged during the 18th and 19th centuries and are recognized under *Section 35* of the *Constitution Act* (MN-S n.d.). Métis peoples have a shared history and common culture (song, dance, dress, and national symbols) arising from the union of European fur traders and Indigenous women. They have a unique language (Michif, with various regional dialects), extensive kinship connections, distinct way of life, and a defined traditional territory across the Canadian Western prairies and parts of British Columbia, Ontario, Northwest Territories, North Dakota, and Montana (MN-S 2023 Pg.1). Like other Indigenous groups across Canada, the effects of colonization significantly impacted the Métis. Despite challenges and barriers stemming from colonization, Métis peoples have persevered and continue to share, celebrate, and honour historical and contemporary Métis ways of knowing and doing today such as the Back to Batoche Festival in July 2022 (MN-S 2023.

The MN-S is a democratically elected government that represents Métis citizens across the Métis Homeland in Saskatchewan. MN-S is mandated to implement Métis inherent right to self-determination and falls under the Métis Nation Legislative Assembly (MN-S n.d.). Northern Region 1 (NR1) and Northern Region 3 (NR3) are regional bodies within MN-S that have

constitutional structure for the provision of delegated programs and services. Each region within MN-S has a Regional Director and encompasses local, part-time volunteer Métis groups ("Locals") comprising the local councils of Métis communities. Locals are entities that must be consulted. Figure 1 below illustrates the Métis governance structure in Saskatchewan.

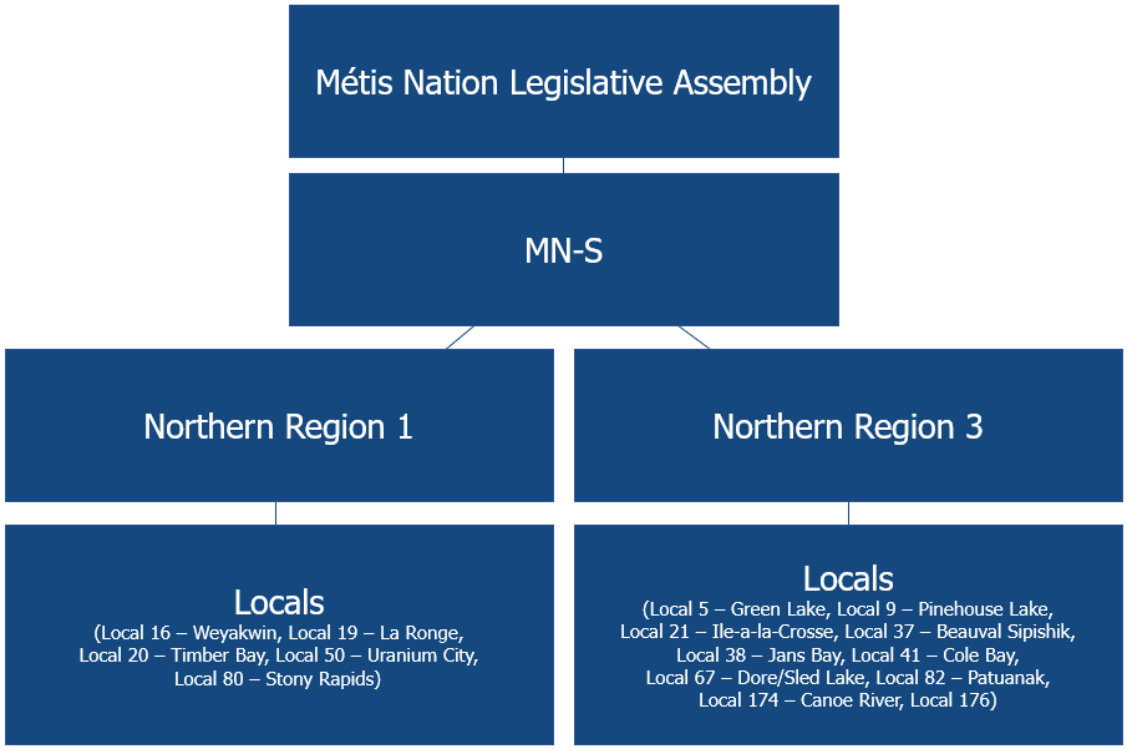

Figure 1: Métis Governance Structure in Saskatchewan

MN-S works with Locals to support Métis consultation and engagement during the Environmental Assessment process. Consultation and engagement with Métis cannot be limited to Local and Regional governance bodies. The governance structure also requires consultation and engagement with MN-S who are responsible for broader Métis interests.

Métis citizens and communities continue to be affected by past and existing resource development projects. This technical review reflects Métis of Saskatchewan valued interests and expectations.

3. DETAILED REVIEW

3.1 Executive Summary

Issue #	Concerns	Recommendations
ES-001	**2 Project Overview (p. 2)** "The use of a collaborative approach to engagement and advancement of the Project is exemplified by the input these groups have provided to influence both Project designs and the EA in various ways." → Denison's engagement approach to date has not been collaborative. → Denison has not engaged all potentially impacted Métis communities.	Denison needs to engage all potentially impacted Métis communities. Specifically, to engage NR1 Locals, and NR3 Locals, in addition to Kineepik Metis Local #9, throughout the life of the Project. Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment/procurement/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.
ES-002	**3 Project Setting (p. 4)** "The Project falls within the boundaries of Treaty 10, in the Nuhtsiye-kwi Benéne (Ancestral Lands) of English River First Nation (ERFN), in the traditional territory of the Kineepik Métis Local #9, in the homeland of the Métis, and within Nuhenéné." → Denison does not acknowledge that the Project falls within the MN-S Homeland.	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.
ES-003	**3 Project Setting (p. 6)** "The closest traditional resource user lease is approximately 12 km away." → Denison did not engage MN-S on potential Project-related effects to Métis traditional use activities 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	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 determine the appropriate funding, process, and timeline to conduct the MKS.

Issue #	Concerns	Recommendations
	way to determine Métis traditional resource use in and around the Project.	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.
ES-004	**3.4.2.4 Waste Management (p. 20)** "Hazardous wastes will be stored temporarily on this pad before being taken off site by waste management service providers for proper recycling or disposal." → Denison EIS does not outline where hazardous waste will be taken for proper recycling or disposal.	Denison needs to share where hazardous waste will be taken for proper recycling and disposal with MN-S, NR1 Locals, and NR3 Locals.
ES-005	**3.4.3 Proposed Schedule and Activities (p. 21)** *Table 1: Project Phase, Year, and Associated Activities* Phase and Year: Construction Year 1 to 3 and Operation Year 3 to 18 Description of Activities: "Engagement - site visits from Interested Parties" → Per Denison's definition, MN-S, NR1, and NR3 are 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.	Denison needs to engage MN-S, NR1 Locals, and NR3 Locals as an Indigenous Community of Interest throughout the life of the Project. Denison needs to engage MN-S, NR1 Locals, and NR3 Locals, to understand their preferred level of involvement throughout the life of the Project.
ES-006	**3.4.4 Management Systems (p. 22 to p. 23)** "In addition, the EMS [Environmental Management System] establishes expectations (and associated mechanisms) for contractors and sub-contractors to comply with environmental commitments and policies including auditing and enforcement programs. Denison is responsible for, and committed to providing, sufficient resources to: develop and implement the EMS to meet statutory/regulatory requirements; meet its corporate	N/A

Issue #	Concerns	Recommendations
	expectations with respect to environment performance; meet the expectations of its Interested Parties, including Indigenous communities, with respect to environment performance; and fulfill any commitments made through the EA process and beyond through all Project phases." → MN-S appreciates Denison's recognition to reflect MN-S to develop and implement the EMS to MN-S expectations.	
ES-007	**3.4.8 Indigenous Knowledge (p. 26)** "Denison has brought this Indigenous Knowledge and Traditional Knowledge together with western science throughout the EA process. Additionally, Denison is supporting several processes to aid community-led collection of IK. These processes are at different stages of completion. Denison will continue to consider and integrate results from any forthcoming materials provided by communities as it advances the EIS process." → 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.	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 determine the appropriate funding, process, and timeline to conduct the MKS.
ES-008	**4 Summary of Engagement** **4.1 Introduction (p. 27)** "Since 2016, Denison has engaged with Interested Parties to develop meaningful relationships and facilitate a collaborative approach to engagement and the advancement of the project." → Denison has not engaged all potentially impacted Métis communities. Denison's engagement to date has not included Métis communities in NR1.	Denison needs to engage all potentially impacted Métis communities. Specifically, to engage all NR1 and NR3 communities, in addition to Kineepik Metis Local #9, throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest. To facilitate a collaborative approach to engagement, Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment/procurement/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.

Issue #	Concerns	Recommendations
ES-009	**4.1 Introduction (p. 27)** "Denison has developed and implemented an engagement plan to guide and structure engagement activities related to the Project." → MN-S has not had an opportunity to review Denison's engagement plan.	Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment.
ES-010	**4.2 Engagement Approach (p. 28)** "Engagement is defined as the sharing and gathering of project-related information from Interested Parties, and the collaboration with Interested Parties, in good faith, with the goal of developing mutually acceptable resolutions to issues identified. Developing authentic relationships with Interested Parties to facilitate productive engagement is expected to play an integral role in the long-term success of the Project." → Denison has not engaged all potentially impacted Métis communities. Denison's engagement to date has not included Métis communities in NR1.	Denison needs to engage all potentially impacted Métis communities. Specifically, to equally engage all NR1 and NR3 communities, in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest. To facilitate a collaborative approach to engagement, Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment/procurement/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.
ES-011	**4.2 Engagement Approach (p. 28)** "For each engagement activity, any perspectives that were shared by an Interested Party were recorded and consolidated into a single Engagement Database." → There are only two entries related to engagement with Métis communities (with exclusion to Kineepik Metis Local #9) in *Appendix 2A: Section 2 – Engagement Database Summary Table – Project Description*. Kineepik Metis Local #9This record demonstrates little engagement was conducted with Métis communities in NR1 and NR3.	Denison needs to engage all potentially impacted Métis communities. Specifically, to equally engage all NR1 and NR3 Locals in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest. To facilitate a collaborative approach to engagement, Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment/procurement/cultural opportunities, engagement expectations (e.g., involvement of youth and

Issue #	Concerns	Recommendations
		Elders), and approach for gathering and incorporating Métis Knowledge into Project reports, plans, and processes.
ES-012	**4.3 Engagement with Indigenous Groups (p. 29)** "Denison identified the following Indigenous Communities of Interest: • English River First Nation (ERFN); • Kineepik Métis Local #9 (KML); • Sipishik Métis Local #37; and • Patuanak Métis Local #82." → Per Denison's definition, MN-S, NR1 Locals, and NR3 Locals should be considered an Indigenous Community of Interest.	Denison needs to engage MN-S, NR1 Locals, and NR3 Locals as an Indigenous Community of Interest 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.
ES-013	**4.3 Engagement with Indigenous Groups (p. 30)** "Denison also recognizes certain Indigenous organizations offer a single point of contact to member communities to facilitate information sharing and collection. In many cases these organizations have been delegated the right to represent an Indigenous community or group of Indigenous communities in connection with the Project. The four Indigenous organizations that have been identified include the Métis Nation – Saskatchewan (MN-S), Ya'thi Néné Lands and Resource Office (YNLR), Meadow Lake Tribal Council (MLTC), and Prince Albert Grand Council (PAGC)." → MN-S is listed under Indigenous Organizations instead of Indigenous Communities of Interest.	Denison needs to engage all potentially impacted Métis communities. Specifically, to engage all NR1 and NR3 communities, in addition to Kineepik Metis Local #9, throughout the life of the Project. Denison needs to include MN-S and all Métis communities under Indigenous Communities of Interest. To facilitate a collaborative approach to engagement, Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment/procurement/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.
ES-014	**5 Overview of the Environmental Assessment** **5.1.2 Spatial Boundaries (p. 39)**	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.

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	"When determining the spatial boundaries, the following information was considered, as appropriate and available: • Indigenous and local knowledge and engagement;" → 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.	Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to determine the appropriate funding, process, and timeline to conduct the MKS.
ES-015	**5.2 Atmospheric and Acoustic Environment** **5.2.1 Air Quality (p. 41)** "The air emissions monitoring plan will evaluate the effectiveness of the dust management plan." → 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).	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, NR1 Locals, and NR3 Locals to determine the appropriate funding, process, and timeline to conduct the MKS.
ES-016	**5.2.2 Noise (p. 42)** "A noise monitoring program has been recommended to evaluate the effectiveness of mitigation measures and predictions made in the assessment." → 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).	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 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 engage MN-S to determine the appropriate funding, process, and timeline to conduct the MKS. Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment.

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		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.).
ES-017	**5.3 Geology and Groundwater** **5.3.1 Geology (p. 43)** "As part of the mining operations, detailed monitoring activities will be completed to assess the performance of various components of the Project associated with engineering mining designs, subsidence, performance, and infrastructure designs to protect the Geology VC. Subsidence at ground surface within the wellfield will be evaluated from Construction through to Decommissioning, by monitoring the elevation of collars (top of pipe) for wells within the wellfield. Contingency plans, including measures for adaptive management and emergency preparedness plans, will be designed to safeguard the local environment." → 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).	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. 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.).
ES-018	**5.3.2 Groundwater (p. 45)** "Groundwater Quantity and Quality will be monitored from pre-Construction through Operation to assess the performance of the engineering mining designs and performance and infrastructure designs put in place to protect the Groundwater VC. During Decommissioning, monitoring will focus on demonstrating that groundwater remediation within the ISR mining zone meets decommissioning objectives. In Post-Decommissioning, the primary objectives of monitoring will be to demonstrate that	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 provide plain language summaries, posters/handouts, and presentations on monitoring and effects management plans and programs to MN-S, NR1 Locals, and NR3 Locals.

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	natural flow conditions are re-established, and that chemical stability has been achieved with respect to groundwater quality. Chemical stability will be demonstrated by verifying groundwater reactive transport of constituents of potential concern in remediated groundwater aligns with the predictive model. A groundwater monitoring plan including an excursion contingency plan and measures for adaptive management will be implemented for the Project." → 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).	Denison needs to engage MN-S to determine the appropriate funding, process, and timeline to conduct the MKS. 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.).
ES-019	**5.4 Aquatic Environment** **5.4.1 Surface Water Quantity (p. 46)** "Monitoring programs will be established for confirming the predictions made in the assessment. The programs should remain consistent with the historical long-term monitoring study to facilitate continued establishment of long-term streamflow trends at the site through relationships to long-term, government-operated hydrometric gauging stations in the same watersheds." → Métis Knowledge should inform the development of the Project's environmental monitoring and management plans (e.g., Caribou Management Plan).	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 and 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 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.).

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ES-020	**5.4.2 Surface Water Quality (p. 47)** "Monitoring programs will confirm the effectiveness of mitigation measures and predictions made in the assessment and will include measurement of radiological and non-radiological water quality parameters to meet regulatory criteria. Monitoring will occur within the collection ponds and the receiving water (i.e., Whitefish Lake). In consultation with Indigenous communities, relevant federal and provincial agencies, and other Interested Parties, in the development and implementation of this VC-specific program, specific monitoring and follow-up plans will be prepared to refine and finalize the monitoring approach." → Information to be gathered during the MKS will contribute to the development of the Project's environmental monitoring and management plans (e.g., Caribou Management Plan). → The Draft EIS does not clarify the influence of groundwater temperature on Whitefish Lake.	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 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 confirm the influence of groundwater temperature on Whitefish Lake in the Final EIS.
ES-021	**5.4.3 Sediment Quality and Benthic Invertebrates (p. 49)** "Monitoring and follow-up are recommended for the Sediment Quality and Benthic Invertebrate VCs to verify the accuracy of the predicted effects and effectiveness of proposed mitigation measures. The sediment quality and benthic invertebrate monitoring program will be considered in conjunction with the surface water quantity (hydrology) and surface water quality monitoring programs as they are specifically tied to these programs from the perspective of pathways of effects. Monitoring	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.

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	of total suspended solids in the effluent monitoring ponds and other catchment ponds, prior to discharge to the environment, will be important in providing context to further evaluate Project-related effects to Sediment Quality and Benthic Invertebrates in the receiving water environment (Whitefish Lake or LA-5)." → 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).	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 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.).
ES-022	**5.4.4 Fish and Fish Habitat (p. 51)** "Monitoring for the Fish and Fish Habitat VC will occur to verify the accuracy of the predicted effects and the effectiveness of the proposed mitigation measures. Effluent and receiving water quality monitoring will be conducted as per federal and provincial regulations and will include radiological and non-radiological parameters. Monitoring of the biological environment will be undertaken to meet federal and provincial regulations (e.g., Metal and Diamond Mining Effluent Regulations Environmental Effects Monitoring program) and will occur in consultation with Indigenous groups." → 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).	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 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

Issue #	Concerns	Recommendations
		summaries, annual monitoring report, community meetings etc.).
ES-023	**5.4.5 Fish Health (p. 53)** "A monitoring program for Fish Health is recommended to confirm the effectiveness of mitigation measures and predications made in the assessment. The program will involve the collection of multiple fish species to assess changes in fish tissue concentration of constituents of interest." → 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).	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 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.).
ES-024	**5.6 Human Health** **5.6.1 Human Health (p. 57)** "Monitoring programs are outlined to confirm the effectiveness of mitigation measures and verifying and improving model predictions made in the assessment. Environmental monitoring would follow requirements and guidance in CSA N288.4-19 and would be informed by the results of engagement activities. Examples of monitoring include surface water, sediment, and soil	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 provide plain language summaries, posters/handouts, and presentations on monitoring and effects management plans and programs to MN-S, NR1 Locals, and NR3 Locals.

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	samples, as well as fish tissue, benthic invertebrate tissue, and country food samples such as blueberries from Whitefish Lake, McGowan Lake, Russell Lake, and reference locations, as applicable." → 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).	Denison needs to engage MN-S to determine the appropriate funding, process, and timeline to conduct the MKS. 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 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.).

3.2 Section 1 Introduction

Reviewed, no issues identified.

3.3 Section 2 Project Description

Issue #	Concerns	Recommendations
2-001	**2.2.1 Mining (p. 2-3)** "Denison discussed potential mining methods early in the engagement process for the Project. In 2018, Denison organized a series of workshops with Communities of Interest and stakeholders." → Denison has not had meetings to introduce the Project, share information on Project alternatives and options, Valued Components, the ISR mining method and proposed freezing method, or any other topics of interest to the MN-S and Métis communities in NR1. These communities also did not receive a VC survey to identify VCs of importance to Citizens and/or other interests and concerns related to the Project.	Denison needs to equally engage all NR1 and NR3 Locals, in addition to Kineepik Metis 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/cultural opportunities, engagement expectations (e.g., involvement of youth and Elders), and include in the Final EIS how it proposes to incorporate and feature Métis Knowledge into Project reports, plans, and processes.

Issue #	Concerns	Recommendations
2-002	**2.2.1.3.2 Freeze Wall Timeline (p. 2-14)** "The removal of the freeze wall will allow groundwater to re-establish its original flow path through the area (22-EN-VB/ERFNLP-619.6)." → This may cause increased migration of constituents that could cause environmental release to the receiving environment unintentionally.	Denison needs to clarify the following with MN-S, NR1 Locals, and NR3 Locals: a.) the freezing effects on the Upper and Lower barrier zones post mining, and b.) if the freeze thaw process could cause increased fracturing potential within these zones.
2-003	**2.3.4 Post-Decommissioning (p. 2-85)** "The Post-Decommissioning monitoring program will be designed and conducted in accordance with the provincial and federal regulations and licence conditions. The monitoring program will be conducted until the site-specific decommissioning and reclamation objectives for the Project are met. Monitoring reports will be developed and submitted to both the provincial and federal regulators, in accordance with licence conditions." → Denison does not acknowledge MN-S, NR1, or NR3 involvement in the design and implementation of the post-decommissioning monitoring program.	Denison needs to engage MN-S, NR1 Locals, and NR3 Locals in the design and implementation of decommissioning planning and all subsequent monitoring programs for the Project. This will allow Métis to share their interests in the long-term state of the land and incorporate Métis knowledge. It will also create opportunities for Métis youth and Elders to participate in monitoring programs.
2-004	**2.3.5 Ancillary Projects (p. 2-85)** "SaskPower proposes to tap the existing I3P 138 kV line near Highway 914 and build approximately 4.5 km of new 138 kV line from the I3P tap to the Project site. SaskPower will be responsible for conducting activities such as line routing, environmental studies, and permitting, public consultation, and engineering design work as applicable to the load interconnection." → 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.	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.

Issue #	Concerns	Recommendations
2-005	**2.7 Project Benefits (p. 2-92)** "Positions expected throughout Construction and Operation of the Project include supervisory and management positions, trade positions, professional and technical positions, and labour positions (with a Grade 12 requirement and in-house training programs). Training for various positions is offered through Saskatchewan Indian Institute of Technologies, Saskatchewan Polytechnic, and other institutes in northern Saskatchewan. Specific training for the Project will be developed on an identified needs basis." → 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.	Denison needs to confirm what kind of education and training support it will make available to maximize employment from Communities of Interest. Denison needs to support Métis training opportunities through Northlands College. Denison needs to provide additional detail on which roles will need Grade 12, and how many roles are available for people without Grade 12.
2-006	**2.7 Project Benefits (p. 2-92)** "The need for goods and services during Construction, Operation, and Decommissioning will generate business opportunities throughout the life of the Project….. Examples of anticipated operating goods and services include catering, housekeeping, food, freight, and bulk materials such as fuel, propane, and reagents." → 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 needs to provide specific information on the goods and services opportunity available to Métis as per labour force and business analysis.
2-007	**2.7 Project Benefits (p. 2-92 to 2-93)** "As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is	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.

Issue #	Concerns	Recommendations
	committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities" (Denison Mines 2022). Denison has established a procurement approach that requires the procurement of all goods and services for the Project to first consider businesses based within the Communities of Interest prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan. Throughout all phases of the Project, Denison will prioritize procurement efforts within the immediate vicinity and region." → Denison has not specified how it is transmitting knowledge nor provided an explanation of the procurement approach.	
2-008	**2.9.1.3.1 Environmental Protection Program (p. 2-101)** "An Environmental Protection Program 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 that Denison may set." → The Draft EIS does not include a draft Environmental Protection Plan (EPP) or a summary of how the EPP will be developed.	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.
2-009	**2.9.1.3.1 Environmental Protection Program (p. 2-101 to 2-104)** "Management and Monitoring of Emissions . . . Liquid Effluent Monitoring Plan . . . Air Emissions Monitoring Plan . . . Groundwater Monitoring Plan . . .	Denison needs to involve Métis (MN-S, NR1 and NR3) in the development of monitoring plans and be allowed to review how their own knowledge is being used and how it informed the plan. Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for input, review and comment.

Issue #	Concerns	Recommendations
	Environmental Monitoring Plan . . . Woodland and Caribou Management Plan . . . monitoring plan would be informed by existing local and traditional knowledge, ongoing engagement activities with interested parties, information generated by development of EIS and its supporting documents, [as well as] relevant guidance..."” → 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.	Denison needs to include an implementation and reporting plan with the monitoring plans.
2-010	**2.9.1.3.5 Emergency Preparedness and Response Program (p. 2-105)** “The Emergency Preparedness and Response Program would 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 objectives of the program would include the following: • identification of accidents and emergencies and the actions and responsibilities in the event of an emergency; • Project requirements for emergency response equipment and personnel; • internal incident command structure to effectively manage complex, lengthy, and large scale emergencies; • required communications with external emergency services, statutory bodies, and public, Indigenous groups, and regulatory agencies;	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.

Issue #	Concerns	Recommendations
	• development of appropriate emergency procedures; and • assurance of availability of vital information during an emergency." → No Emergency Preparedness and Response Program was available for review.	

3.4 Section 3 Indigenous and Local Knowledge

Issue #	Concerns	Recommendations
3-001	**3.4.2.3 Métis Nation - Saskatchewan (p. 3-10)** "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." → 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	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.
3-002	**3.4.8 Lands Taken Up from an Indigenous Perspective (p. 3-18)** "Among the sources of information to consider, the federal guidance notes the importance of '*Aboriginal traditional knowledge, community knowledge and scientific knowledge, or simply an expression of concern regarding potential cumulative effects to a particular VC*' (Government of Canada 2019). All sources of information were considered by discipline leads as described in this EIS section and Section 4 Engagement. The CEA for all VCs completed for the Project incorporated, as	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.

Issue #	Concerns	Recommendations
	appropriate, the characterization of activities/events that have shaped the existing environment and continue to influence the VCs used for the EIS." → Perspectives on cumulative impacts have only been considered for English River First Nation and Kineepik Metis. This has resulted in an absence of MN-S perspective regarding cumulative impacts within the Project and surrounding areas.	
3-003	**3.4.6 Addressing Divergence Between Indigenous Knowledge and Western Scientific Knowledge Systems (p. 3-14)** "Discrepancies among IK and western scientific information provide an opportunity for Denison needs to take a precautionary approach. Examples of concrete actions to address uncertainty in cases where IK and LK have differing conclusions on predicted Project effects include addressing uncertainty through monitoring and follow-up programs and communicating results of those monitoring and follow-up programs to demonstrate they have been responsive to the IK shared." → 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.	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).

3.5 Section 4 Engagement

Issue #	Concerns	Recommendations
4-001	**Glossary (p. 4-vii)** "Indigenous Community of Interest: A community whose traditional land or potential or established Aboriginal and/ or Treaty rights are in proximity to the Project or has existing transportation infrastructure that would be used by 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.

Issue #	Concerns	Recommendations
	An Indigenous Community of Interest is more likely to experience impacts from the Project. Indigenous community: An Indigenous community with a potential interest in the Project, including any Indigenous community identified by a Regulatory Agency as having a potential interest in the Project." → Per Denison's definition, MN-S, NR1 Locals, and NR3 Locals should be considered an Indigenous Community of Interest.	
4-002	**4.1.2 Denison's Indigenous Peoples Policy and Investment and Sustainability Philosophy (p. 4-3)** "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)."	Denison needs to clarify how it intends to consider free, prior, and informed consent (FPIC).

Issue #	Concerns	Recommendations
	→ Denison does not explain how it will accomplish free, prior, and informed consent (FPIC) as per the IPP and RAP.[2]	
4-003	**4.2 Engagement Approach (p. 4-5)** *Figure 4.2.1: Interested Parties for the Project* → MN-S is listed under Indigenous Organizations instead of Indigenous Communities of Interest. Not all potentially impacted Métis communities are listed in this figure. Métis communities listed under Indigenous Communities of Interest include Kineepik Metis Local #9, Sipishik Metis Local #37, Patuanak Metis Local #82. Métis communities listed under Other Indigenous Communities include Dore/Sled Lake Métis Local #67 and A La Baie Métis Local #21. These Métis communities are all within NR3.	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.
4-004	**4.2 Engagement Approach (p. 4-6)** "Denison has further identified key objectives respecting Indigenous engagement associated with the Project: • Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency. • Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion. • Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects.	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.

[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

Issue #	Concerns	Recommendations
	Engagement activities for the Project can and will evolve over time, as information is gathered that is pertinent to Denison's understanding of the Interested Parties and their relationship to, and interest in, the Project." → MN-S appreciates Denison's willingness to evolve engagement activities in response to feedback from MN-S over time.	
4-005	**4.3.1 Engagement with Identified Indigenous Communities and Organizations, and Supporting Criteria (p. 4-11)** *Figure 4.3-2: Identified Indigenous Communities and Organizations in Relation to the Project* → Only NR3 communities are listed in Figure 4.3-2: Unidentified Indigenous Communities and Organizations in Relation to the Project.	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.
4-006	**4.3.1 Engagement with Identified Indigenous Communities and Organizations, and Supporting Criteria (p. 4-12)** "The following criteria have been used to appropriately evaluate Indigenous communities located in the NAD [Northern Administration District] that would be engaged by Denison: • Treaty 10 signatory (Treaty in which the Project is located); • potential or established Indigenous and/or Treaty Rights within the Project Area; • geographic proximity of community and/or reserve land to the Project site; • known traditional territory in and around the Project site;	Denison needs to engage all potentially impacted Métis communities. Specifically, to equally engage all NR1 and NR3 Locals in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest.

Issue #	Concerns	Recommendations
	• history of relationship with operating companies, the CNSC, and the Province in relation to other projects located near the Project (McArthur River, Key Lake, Millennium); and • the potential for collective exercising of Indigenous and/or Treaty Rights in proximity to the Project." → Denison has not engaged all potentially impacted Métis communities. Métis communities in NR1 and NR3 meet multiple evaluation criteria identified by Denison. → Denison's explanation related to the selection of Indigenous groups to be engaged on the Project is unsatisfactory.	
4-007	**4.3.1 Engagement with Identified Indigenous Communities and Organizations, and Supporting Criteria (p. 4-14)** "As the elected government of the Métis people of Saskatchewan, the MN-S plays an important role related to engagement activities. The MN-S is currently structured with a President, an Executive, a Provincial Métis Council, Regional Presidents, and Local Presidents. → The Project is located within Métis NR1 in Saskatchewan. However, several key Métis communities with whom Denison is engaging are located in Métis NR3. → The MN-S website states that "consultations must be with the Métis government structures that are elected and supported by the Métis people." (MN-S n.d.c.)" → Denison has not engaged with Métis communities outside of NR3.	Denison needs to engage all potentially impacted Métis communities. Specifically, to equally engage all NR1 Locals and NR3 in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest.
4-008	**4.3.2.1.3 Key Engagement Activities (p. 4-16)** "The main forms of engagement included meetings with Chief and Council, community meetings, a workshop on early infrastructure options (2018), a site visit (2019), virtual	Denison needs to engage all potentially impacted Métis communities. Specifically, to equally engage all NR1 and NR3 communities in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include

Issue #	Concerns	Recommendations
	presentations and meetings on VCs (2021), two online surveys (2021 and 2022), and a meeting and information session on preliminary effects and mitigation (2022)." → Denison's engagement to date has largely been with Métis communities in NR3. Particularly, the Kineepik Metis Local #9 community. → Denison has not had meetings to introduce the Project, share information on Project alternatives and options, VCs, the ISR ming method and proposed freezing method, or any other topics of interest to the MN-S and Métis communities in NR1. These communities also did not receive a VC survey to identify VCs of importance to Citizens and/or other interests and concerns related to the Project.	MN-S and all Métis communities under Indigenous Communities of Interest. Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment/procurement/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.
4-009	**4.3.2.3 Engagement with Sipishik Métis Local #37** **4.3.2.3.1 History of Interactions (p. 4-42)** "In 2019, the SML delegated their Duty to Consult for the Project to the MN-S. From 2019, the MN-S has been representing SML in respect of engagement with Denison for the Project. Clear distinction between the Métis leadership and Citizens, and the Village leadership and residents was, therefore, necessary to make sure the MN-S was able to appropriately provide the representation of the Métis of SML, per the delegated Duty to Consult. As a result, Denison focused engagement efforts exclusively toward the general public of the Village of Beauval onwards from this point, with no intended overlap in relation to Métis interests." → Denison is taking engagement direction from MN-S to not lump public engagement efforts with Métis engagement is appreciated.	Denison needs to engage Beauval/Sipishik Métis Local #37 throughout the life of the Project.
4-010	**4.3.2.3.4 Key Issues and Concerns (p. 4-44)**	Denison needs to share all policies related to creating a safe workplace with MN-S, NR1 Locals, and NR3 Locals for

Issue #	Concerns	Recommendations
	Table 4.3-4: Key Issues and Concerns from Sipishik Métis Local #37 "Concern with racism and other factors in workplace affecting employee retention. . . . Denison has several policies in place that will be adhered to for the Project, including a Workplace Violence & Harassment Policy." → 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.	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".
4-011	**4.3.2.4.3 Key Issues and Concerns (p. 4-46)** *Table 4.3-5: Key Issues and Concerns from Patuanak Métis Local #82* "Complete = response provided to issue, interest, or concern in EIS, where appropriate." → Denison created "Key Issues and Concerns" tables in their EIS to document responses to issues and concerns identified by Indigenous Groups. → 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	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.

Issue #	Concerns	Recommendations
	discuss the presence or absence of effects, rather than responding that effects were studied.	
4-012	**4.3.3.5 Engagement with A La Baie Métis Local #21** **4.3.3.5.1 History of Interactions (p. 4-52)** "In 2019, the ALBML delegated their Duty to Consult for the Project to the MN-S. Clear distinction between the Métis leadership and Citizens, and the Village leadership and residents was, therefore, necessary to make sure the MN-S was able to appropriately provide the representation of the Métis of ALBML, per the delegated Duty to Consult. As a result, Denison distinguished its engagement efforts between MN-S, on behalf of ALBML, and the general public of the Village of Île-à-la-Crosse, with no intended overlap in relation to Métis interests." → Denison's responsiveness to engagement direction from MN-S to not lump public engagement efforts with Métis engagement is appreciated.	N/A
4-013	**4.3.4 Engagement with Indigenous Organizations** **4.3.4.1 Métis Nation – Saskatchewan (p. 4-55)** "As the elected government of the Métis people of Saskatchewan, the MN-S plays an important role related to engagement activities. The MN-S is currently structured with a President, an Executive, a Provincial Métis Council, Regional Presidents, and Local Presidents. The MN-S website states that *'consultations must be with the Métis government structures that are elected and supported by the Métis people'* (MN-S n.d.b). The Project is located within Métis Region 1; however, there are Métis Locals in the general area of interest from Northern Region 3."	Denison needs to engage all potentially impacted Métis communities. Specifically, to see Denison equally engage NR1 Locals and NR3 Locals in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest.

Issue #	Concerns	Recommendations
	→ Denison has not engaged all potentially impacted Métis communities. Denison has focused engagement efforts on Métis communities in NR3.	
4-014	**4.3.4.1.2 Agreements Relative to the Environmental Assessment Process (p. 4-56)** "In recognition of the MN-S' potential interests in the Project, Denison and MN-S have been negotiating a capacity funding agreement. Denison anticipates the capacity funding agreement and associated workplan and budget will be signed in late September or early October 2022. Once signed, this agreement will outline a mutually agreeable framework and applicable funding arrangements to facilitate the MN-S' participation and engagement in the EA process for the Project. 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." → 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.	Denison needs to revise the Final EIS to note that a capacity funding agreement was reached with MN-S.

3.6 Section 4A Engagement Appendix

Reviewed, no issues identified.

3.7 Section 5 Approach and Methodology of the Assessment

Issue #	Concerns	Recommendations
5-001	**5.3.1 Valued Components Selection (p. 5-5)** "Initial direction and input into VC selection were obtained through discussions with Indigenous groups, government agencies, and the public." → Métis input to VC selection was limited to NR3 communities.	Denison needs to confirm the selected valued components with Métis Locals in NR1 and NR3 and revise the Final EIS as required to reflect their input.
5-002	**5.4 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on (p. 5-19)** "In this EIS, IK and LK are viewed as complimentary and influential alongside western science to produce a full understanding of the potential effects of the Project, whether measurable or perceived." See also: *11.1.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment* (p. 11-15) → 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.	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.
5-003	**5.6.1 Potential Interactions Between the Project and Valued Components/Key Indicators (p. 5-25)** *Table 5.6-2: Summary Interaction Matrix for Valued Components in the Human Environment* → 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 some of the interaction table in related VCs.	Denison needs to update Table 5.6-2 be to be consistent with revised interaction tables for related VCs.
5-004	**5.3 Scope of the Assessment (p. 5-5)** "Scope of the Assessment"	Denison needs to provide details in the Final EIS on data and analysis limitations.

Issue #	Concerns	Recommendations
	→ 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.	
5-005	**5.8 Residual Effects Evaluation (p. 5-30)** "Residual Effects Evaluation" → 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 remain after the implementation of all mitigation measures and management plans are characterized as minor and not carried forward for evaluation.	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.
5-006	**5.9.1 Cumulative Effects Assessment Process (p. 5-34)** "The approach for assessing cumulative effects considers both the current conditions (which include changes caused by past development, projects, and activities, and are, therefore, considered in the baseline condition of the VC)" → Denison acknowledges that cumulative effects are important to Indigenous communities in section 5.9.3 (p. 5-42). → 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	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.

Issue #	Concerns	Recommendations
	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).	
5-007	**5.9.2 Identification of Present or Reasonably Foreseeable Projects and Activities (p. 5-34 -5-35)** "projects that are either proposed (e.g., are in the publicly available review process) or have been approved to be built, but are not yet built, for which the residual effects overlap spatially and temporally with those of the Project (i.e., they are reasonably foreseeable)." → 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.	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.

3.8 Section 6 Atmospheric and Acoustic Environment

Section 6 was excluded from this review.

3.9 Section 7 Geology and Groundwater

Issue #	Concerns	Recommendations
7-001	**7.4.1 Potential Project-Valued Components Interactions (p. 7-44)** *Table 7.4-1 Potential Project Interactions for the Geology Valued Component* "Hazardous waste management (temporary storage, handling, and off-site transportation)" See also: EIS Section 2 – Project Description *Table 2.3-1: Key Activities for the Wheeler River Project* (p. 2-71) "Wellfield and freeze hole drilling; ground freezing" → There is lack of geotechnical information in the Draft EIS that would expand explanation of Project interactions with geology and groundwater.	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.
7-002	**7.5 Mitigation Measures (p. 7-63)** *Table 7.5-1 Summary of the Mitigation Measures Based on Project Phases for the Geology and Groundwater Valued Components* " In situ recovery operations affecting subsidence at ground surface associated with consolidation of rock mass (ore) at significant depth (approximately 400 m) below ground." → There is lack of information, details and modelling related to potential subsidence.	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 continuous action. Denison needs to prepare a management and monitoring plan for subsidence.

3.10 Section 8 Aquatic Environment

Issue #	Concerns	Recommendations
8-001	**8.0 Aquatic Environment** Naming waterbodies in maps/figures.	Denison needs to revise maps/figures to include labels for key waterbodies referenced in the EIS, particularly for figures included in section 8.

Issue #	Concerns	Recommendations
	→ 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.	Denison needs to ensure waterbodies are named consistently throughout section 8.0 Aquatic Environment.
8-002	**8.3 Fish and Fish Habitat** **8.3.6.1 Residual Effects Characterization (p. 8-143)** "Given that fishing on LA-5 has not been documented, and the effect is expected to be of low magnitude, changes in fish abundance or distribution are not expected to be detectable to Indigenous land users." → Not all fishing and hunting activities are documented. Currently, the MKS has not been completed and therefore this assumption may be incorrect.	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.
8-003	**8.3.8 Monitoring and Follow-up (p. 154)** "The fish and fish habitat monitoring and follow-up program will have the following objectives: . . . • monitoring changes in fish communities/populations within the Project LSA; and • monitoring changes in physical fish habitat within the receiving environment of LA-5." → Russell Lake is not identified as a location to monitor fish health.	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.
8-004	**8.5 Fish Health** **8.5.7.1 Potential Cumulative Effects (p. 8-250)** "Fish Health VC are primarily related to c the controlled" → Typo in report	Denison needs to address the typo and replace "c" with the complete word.

Issue #	Concerns	Recommendations
8-005	**8.5.8 Monitoring and Follow-up (p. 8-253)** "Fish Health monitoring . . . in the natural environment will occur at an upstream reference location (i.e., LA-6 – Whitefish Lake North)" → 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.	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.

3.11 Section 9 Terrestrial Environment

Issue #	Concerns	Recommendations
9-001	**9.1 Terrain, Soil, and Organic Matter/Peat** **9.1.1.3 Spatial Boundaries (p. 9-11)** "Terrestrial Regional Study Area (RSA): encompasses the Project Area and LSA [Local Study Area] plus a minimum *8 km surrounding buffer around the LSA"* → The terrestrial RSA seems small in consideration of woodland caribou and determining the impacts of the Project in association with the SK1 caribou population.	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.
9-002	**9.2 Vegetation and Ecosystems, Listed Plant Species and Wetlands** **9.2.3.3 Wetlands Valued Components (p. 9-93)** *Figure 9.2-8: Wetlands, Waterbodies and Lakes within the Project Study Areas* → 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.	Denison needs to clarify and distinguish in the Final EIS if and why lakes and waterbodies are treated differently.

Issue #	Concerns	Recommendations
9-003	**9.2.7.3 Cumulative Effects Characterization and Determination of Significance (p. 9-143)** "The cumulative effect of change in concentrations of COPC [constituent of potential concern] in plant tissue is not expected to result in a change in the constituent concentrations in vegetation KI that will alter the integrity of vegetation within the Terrestrial RSA to the point where it is not sustainable or is unavailable to contribute to ecological functions; therefore, the cumulative effect of change in areal extent of habitat types is expected to be **not significant**." [*emphasis in original*] → 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.	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.
9-004	**9.3 Ungulates, Furbearers, and Woodland Caribou** **9.3.3.1.1 Scientific Literature Review (p. 9-175)** *Table 9.3-3: 2016 to 2020 Annual Resident Moose Harvest through Regular and Draw Licences (SK MOE 2021)* → 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 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. → 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	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, 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.

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	assessing a project that is in an area where there is mostly (if not all) Indigenous hunters for moose and other ungulates.	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.).
9-005	**9.3.4.2.1 Alteration and/or Loss of Habitat (p. 9-211)** "The effect of habitat alteration and/or loss on woodland caribou is expected to be minimal during Post-Decommissioning, as regeneration of vegetation is expected to continue within reclaimed areas." → 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. → 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.	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.
9-006	**9.3.4.2.2 Change in Mortality (p. 9-217)** "However, during the Decommissioning and Post-Decommissioning phases, the Project Area is expected to temporarily create habitat that could support higher densities of alternative prey species, potentially increasing predator density in the region." → 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.	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.

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9-007	**9.3.5.2 Additional wildlife specific mitigation measures (p. 9-219)** "A wildlife monitoring plan and a Woodland Caribou Management Plan will be developed to address wildlife-specific mitigation measures based on proven and accepted mitigation following standard industry guidelines and BMPs." → This plan is an important tool for managing caribou in the short and long-term.	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
9-008	**9.3.6.4.1 Alteration and/or Loss of Habitat (p. 9-274)** *Table 9.3-24: Summary of the Characteristics Ratings for Alteration and/or Loss of Available Woodland Caribou Habitat* "It is expected that revegetated areas will not become available woodland caribou habitat until terrestrial and arboreal lichen have re-established in the regenerated vegetation communities, up to 20 years post-disturbance." → 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.	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.
9-009	**9.3.7.3.3 Woodland Caribou (p. 9-302)** "The woodland caribou population in the region is reported to be stable and their anthropogenic habitat disturbance is currently estimated at 1.5% in the Terrestrial RSA, which is below the 5% threshold of anthropogenic disturbance recommended as a requirement to sustain viable populations (ECCC 2019)." → The 5% threshold disturbance is for a viable population which is the SK1 population.	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

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		alignment with the SK1 Range Plan being developed by the Province.
9-010	**9.3.8 Monitoring and Follow-up (p. 9-307)** This section does not specifically identify a Woodland Caribou Management Plan. → Previous sections of the Draft EIS identified the development of the Woodland Caribou Management Plan.	Denison needs to confirm the preparation and inclusion of a Woodland Caribou Management Plan within this section of the Final EIS.

3.12 Section 10 Human Health

Section 10 was excluded from the review.

3.13 Section 11 Land and Resource Use

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11-001	**11.1.1.1 Values Component Selection (p. 11-8)** "'To validate VC selection and as part of engagement activities, Denison sought feedback from the English River First Nation (ERFN) [ERFN's Wapachewunak Reserve 192D is also referred to a Patuanak] and the Northern Village of Beauval, the Northern Village of Kineepik Metis Local #9 Lake, and the Northern Hamlet of Patuanak (hereafter Beauval, Kineepik Metis Local #9, and Hamlet of Patuanak, respectively)." → Arrangements and applicable funding to facilitate MN-S' participation and engagement in the EA process are underway. It is expected that MN-S will be given the opportunity to validate VC selection and have this information reflected in the Final EIS.	Denison, in the Final EIS, needs to demonstrate that it confirmed the selected valued components with Métis Locals in NR1 and NR3.
11-002	**11.1.2.3 The Métis Nation of Saskatchewan [*sic*] (p. 11-18)**	Denison needs to correctly reference Métis Nation-Saskatchewan throughout the Final EIS.

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	"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." → The correct name is "Métis Nation-Saskatchewan" (no "of").	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.
11-003	**11.1.4.1 Potential Interactions Between the Project and Valued Component/Key Indicators (p. 11-41)** *Table 11.1-7: Potential Project Interactions for Indigenous Land and Resource Use* → 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.	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. 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.
11-004	**11.1.4.3.1 Terrestrial Resource Availability (p. 11-46)** "Though other large terrestrial mammals are harvested, such as elk and white-tailed deer, these species are not found in sufficient abundance in the LSA to be assessed as part the Project." → 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.	Denison needs to include additional information in the Final EIS on why large terrestrial mammals that are harvested in the LSA (such as elk and white-tailed deer) are not found in sufficient abundance in the LSA to support this conclusion.
11-005	**11.1.5 Mitigation Measures (p. 11-61)** "Mitigation Measures"	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.

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	→ 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. → 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.	
11-006	**11.1.8 Monitoring and Follow-up (p. 11-73)** "Monitoring and Follow-up" → In the Draft EIS, Denison has proposed to develop monitoring programs, but as not begun engaging with MN-S or NR1 and NR3 Locals on contents of these programs. →	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.
11-007	**11.1.7 Cumulative Effects (p. 11-69)** "Existing projects were not considered as part of the CEA because they were captured and assessed within baseline conditions." → 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. → 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	Denison needs to include in the Final EIS, a cumulative effects assessment that considers pre-development conditions related to Indigenous use to understand the ongoing impacts of past and existing activities that continue to affect Indigenous cultural use of lands and resources.

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	Cumulative Effects) and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process).	
11-008	**11.2 Other Land and Resource Use** **11.2.3.1.2 Big Game Hunting (p. 11-97)** "Based on the last two years of data, the average annual estimated moose harvest by licensed hunters in WMZ 75 was 7.5 by 34 hunters, and the average annual estimated black bear harvest was 5.5 by five hunters." → 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.	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.
11-009	**11.2.3.1.4 Upland Game Bird Hunting (p. 11-98)** *Table 11.2-4: 2019 Upland Game Bird Harvest and Harvest Effort in Game Bird Management Unit 6* → 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.	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.
11-010	**11.2.3.9 Indigenous Perspectives on Other Land and Resource Use (p. 11-109)** "The existing environment for OLRU [Other Land and Resource Use] collectively describes the activities and land uses that have intersected with ILRU over time." → The characterization of Indigenous perspectives on other land and resource use does not yet reflect MN-S and NR1 and NR3	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.

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	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.	
11-011	**11.2.4.5.1 Aesthetic Experience (p. 11-125)** "Therefore, this pathway is not carried forward for residual effects assessment." → 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.	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.
11-012	**11.2.7 Cumulative Effects (p. 11-134)** "Existing projects were not considered as part of CEA because they were captured and assessed within baseline conditions." → 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. → 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).	Denison needs to include in the Final EIS, a cumulative effects assessment that considers a pre-development condition related to Indigenous use to understand the ongoing impacts of past and existing activities that continue to affect Indigenous cultural use of lands and resources.

3.14 Section 12 Quality of Life

Issue #	Concerns	Recommendations
12-001	**12.1 Cultural Expression** **12.1.2.3 Other Sources of Information and Local Knowledge (p. 12-12)** "Other Sources of Information and Local Knowledge" → Arrangements and applicable funding to facilitate the MN-S' participation and engagement in the EA process are underway. It's expected that MN-S will be given the opportunity to provide information related to cultural expression and this information will be reflected in the Final EIS.	Denison needs to include in the Final EIS, information provided by Métis Locals in NR1 and NR3 on their input related to cultural expression.
12-002	**12.1.4.2.1 Potential Effect 1: Change in Knowledge Transmission (p. 12-23)** "Even if community members are away on working rotation, knowledge transmission is likely to continue because the entire family and community are involved. According to the *First Nations Regional Health Survey Phase 3* (FNIGC 2018), family members were reported as primarily helping First Nations understand their culture, but it was not limited to parents." → 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.	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.
12-003	**12.1.4.2.1 Potential Effect 1: Change in Knowledge Transmission (p. 12-24)** "It is difficult to predict with accuracy whether perceptions will result in a change in behaviour."	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.

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	→ 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.	
12-004	**Potential Effect 2: Change in Traditional Diet (p. 12-26)** "Experience from other uranium operations in northern Saskatchewan suggests that resource use will continue despite the potential selenium exceedance. . . . members had developed their own culturally appropriate practice of risk assessment and management based on their relationship with the land. . . . The ERFN Trapper had a positive relationship with other uranium operations in the ILRU LSA." → The claims made in these statements sound like the potential Project effects being identified are to be mitigated by ILRU users' behavior, based on past behavior patterns, rather than Project mitigation. →	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 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.
12-005	**12.1.7 Cumulative Effects (p. 12-32)** "Cumulative Effects" → 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)	See recommendation for Issue #5-006.

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	and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process).	
12-006	**12.1.8 Monitoring and Follow-up (p. 12-34)** "No monitoring or follow-up activities are proposed for the Cultural Expression VC. Monitoring activities described for the aquatic environment and human health will be sufficient." → Areas of uncertainty were identified in the analysis of Cultural Expression (e.g., displacement of cultural activities). Adaptive management is an appropriate strategy for helping to reduce uncertainty about environmental effects and the effectiveness of mitigation. It provides flexibility to identify new mitigation measures or to modify existing ones during the life of the Project. → In the Draft EIS, Denison has proposed to develop monitoring programs, but has not begun engaging with MN-S on contents of these programs. As a rights holder, MN-S should have the opportunity to contribute to the scoping, development, and implementation of monitoring programs, including effectiveness reviews and the application of an adaptive management approach.	Considering areas of uncertainty were identified in the analysis of Cultural Expression (e.g., displacement of cultural activities) in the Draft EIS, MN-S request more details in the Final EIS on monitoring (and adaptive management) for areas of uncertainty related to Indigenous cultural expression. This includes a monitoring 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.
12-007	**12.2.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment (p. 12-47)** "Indigenous Knowledge, LK, and engagement were collected and incorporated into the assessment through workshops, surveys, and KPIs [key person interviews] identified in Section 3 and Section 4 of the EIS." → Arrangements and applicable funding for a Métis Knowledge study is underway but not yet incorporated in the assessment.	Denison, in the Final EIS, needs to incorporate the outcome of the Métis Knowledge Study.

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12-008	**12.2.4.1 Potential Interactions Between the Project and Valued Component / Key Indicators (p. 12-74)** *Table 12.2-5: Potential Project Interactions for Community Well-being* → The interaction table 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. 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.	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.
12-009	**12.2.4.2.1 Potential Effect 1 – Change in Population and Demographics (p. 12-79)** "Multiple pick-up points for workers will be determined as part of Project design, including a minimum of two pick-up points in the LSA and one in Saskatoon, with additional locations to be determined relative to eligible labour force supply. In addition, working with LSA communities to develop hiring policies and commuter transportation options that provide flexibility for workers to maintain employment, specifically if they choose to relocate south to larger communities (e.g., Saskatoon) to access education or other amenities for themselves and/or family	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.

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	members, can help with the planning and management of any in-migration and out-migration pressures." See also: Issue # 12-010 → In the Draft EIS, Denison has proposed to develop mitigation measures and management planning, but as not begun engaging with MN-S on contents of mitigation measures or management plans. As a rights holder, MN-S should have the opportunity to contribute to the scoping, development, and implementation of mitigations, such as input into the location of pick-up points and commuter transportation options.	
12-010	**12.2.4.2.2 Potential Effect 2 – Change in Income (p. 12-80)** "Best efforts will be made to make sure employment is maximized, including within the LSA communities and to encourage business participation within the LSA." → "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 approach and commitment to increased personal income for residents of the LSA.	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.
12-011	**12.2.4.2.2 Potential Effect 2 – Change in Income (p. 12-81)** "Communities have also expressed concerns about the loss of employment following Decommissioning as the loss of income can be difficult for individuals and their families . . . members rely on accessing employment opportunities outside of their communities" → "Community concerns" are identified related to broader spatial (having to move away to work) and temporal ("crash" after	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 addressing community concerns related to increased personal income for residents of the LSA. Decommissioning planning needs to consider employment transition in addition to site clean-up to avoid boom and bust scenarios.

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	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.	
12-012	**12.2.4.2.3 Potential Effect 3 – Change in Community Cohesion (p. 12-83)** "Community members identified the benefits of the Project (e.g., employment and increased income), but had concerns for family members and community members working for the Project being taken out of the community for long periods at a time. Participation in the worker rotation system may affect family dynamics by having an adverse effect on the worker and their immediate families." → "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.	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.
12-013	**12.2.4.2.3 Potential Effect 3 – Change in Community Cohesion (p. 12-84)** "Preparing and educating fly-in/fly-out workers and their families prior to employment can help them make informed choices on a worker rotation lifestyle. Preparation could include strategies to plan and manage a fly-in/fly-out lifestyle, and education on common issues, coping strategies, management of transition between worker rotation and home life, skills for effective communication, tips and ideas from other successful worker rotation families, and financial literacy" → Terminology like "could" is a vague indicator of commitment to developing strategies to address training and support systems	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.

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	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 access to education and supports systems effects for residents of the LSA.	
12-014	**12.2.5 Mitigation Measures (p. 12-85)** "This will include the establishment of health and wellness programming on-site, which will be accessible to all workers." → More detail is needed to understand the types and scope of health and wellness programs. Many of the services listed below this statement are standard health and safety measures for industrial sites and only accessible to on-site staff. They do not address community issues of health and well-being.	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.
12-015	**12.2.5 Mitigation Measures (p. 12-85)** "Programming may include the development of life skills programming to address topics such as managing personal finances and coping with stressful situations." → Terminology like "may" is a vague indicator of commitment to development of life skills programming. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to providing appropriate local resources for supporting the well-being of residents of the LSA.	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 to confirm how Métis input is considered in mitigation development.
12-016	**12.2.5 Mitigation Measures (p. 12-85)** "Pick-up points will be located at two locally central points in communities within the LSA, one additional site in northern Saskatchewan, and potentially other locations to minimize time spent away from families." See also: Issue # 12-010	Denison needs to provide additional detail within the Final EIS, on how the input provided by MN-S, NR1 Locals, and NR3 Locals will influence the development of the location of pick-up points and commuter transportation options

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	→ In the Draft EIS, Denison has proposed to develop mitigation measures and management planning, but has not begun engaging with MN-S on contents of mitigation measures or management plans. As a rights holder, MN-S should have the opportunity to contribute to the scoping, development, and implementation of mitigations, such as input into the location of pick-up points and commuter transportation options.	
12-017	**12.2.5 Mitigation Measures (p. 12-86)** "Mitigation Measures" → More clarity and commitment are required from Denison on social management mitigations and programming. → For example, Denison could implement established mitigations to address effects that are identified in the Draft EIS related to community well-being, such as: a) maintain a Community Liaison Coordinator position to work with communities throughout the Project and provide a grievance mechanism through which individuals can confidentially and independently raise issues should they arise. b) develop a Community Readiness program to support communities and businesses in assessing local capacity, identify critical gaps that would prevent community members from successfully gaining employment, and capture business and economic opportunities related to the Project. c) involving local communities in the development and implementation of monitoring programs could provide opportunities for employment during Construction to beyond the Decommissioning stage.	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.
12-018	**12.2.6.2.2 Community Cohesion (p. 12-89)** "A summary of residual effects on changes in community cohesion is found in Table 12.2-8. The Project will likely result in	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

Issue #	Concerns	Recommendations
	some effects on community cohesion, mainly through participation in the worker rotation system (other pathways through changes in demographics and income are assessed separately in Section 12.2.4.2.1 and Section 12.2.4.2.2)." → 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.	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.
12-019	**12.2.6.2.2 Community Cohesion (p. 12-89)** "Stress associated with participation in the worker rotation system, along with family tensions, may result in use of alcohol/substances as a coping mechanism. In some instances, evidence exists that these factors may result in an increase in violence and crimes, although this would be difficult to attribute directly to the Project." → This statement, and the existing conditions reporting, presents evidence that stress and related responses are a potential indirect effect of changes to employment and income that could be related to the Project.	Considering the uncertainty identified in the Draft EIS about social 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.
12-020	**12.2.8 Monitoring and Follow-up (p. 12-92)** "No monitoring or follow-up is anticipated for Community Well-being. Government departments and private-sector companies that provide community services will continue to monitor the ongoing demand." → 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	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.

Issue #	Concerns	Recommendations
	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.	
12-021	**12.3 Infrastructure and Services** **12.3.1.3.1 Spatial Boundaries (p. 12-105, 12-107)** "Figure 12.3-3 shows the location of the Project in relation to the communities in the LSA, including the locations of Highway 914 and Highway 165." *Figure 12.3-3: Location of the Project in Relation to the Communities in the Local Study Area* → Contrary to the text describing the Traffic Study Area, Highway 914 and Highway 165 are not labelled on Figure 12.3-3.	MN-S request the revision of Figure 12.3-3 to include labelling of Highway 914 and Highway 165 in the Final EIS.
12-022	**12.3.4.2.1 Potential Effect 1 – Change in Traffic (p. 12-148)** "A slight increase in traffic volume during Construction and Operation may result in an increase in collisions." → 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.	Denison needs to clarify and provide analysis of the impact of traffic volume and what is a suitable threshold.
12-023	**12.3.4.2.1 Potential Effect 1 – Change in Traffic (p. 12-148)**	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.

Issue #	Concerns	Recommendations
	"Understanding whether collisions may increase as a result of the Project is difficult to determine and cannot be predicted with accuracy." → Clarity is required to explain why collisions can not be predicted with accuracy given the availability of existing predictive modelling for traffic management planning.	
12-024	**12.3.4.2.2 Potential Effect 2 – Change in Community Infrastructure and Services (p. 12-150)** "If a family member is away for an extended period of time through worker rotation, remaining family members will likely have more responsibilities, and may require additional support (e.g., childcare, counselling, family support services)" → 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.	Denison to provide in the Final EIS additional detail on commitments to support employee families while on rotation.
12-025	**12.3.4.2.2 Potential Effect 2 – Change in Community Infrastructure and Services (p. 12-151)** *Table 12.3-14: Summary of Social Services and Organizations for English River First Nation, Kineepik Metis Local #9 Lake, and Beauval* → The services listed in Table 12.3-14 are predominately crisis management services and general health care services which are provided by existing organizations in the community/region. → Clarification is required to identify the community services that Denison will make available to the families of local employees to address shift rotation issues (e.g., childcare services) and how Denison will help families with access these services.	Denison's 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)

Issue #	Concerns	Recommendations
12-026	**12.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment (p. 12-108)** "Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment" → Arrangements and applicable funding for a Métis Knowledge study is underway but not yet incorporated in the assessment.	Denison needs to include in the Final EIS, Métis Knowledge study findings on their perspectives on infrastructure and services.
12-027	**12.3.4.2.2 Potential Effect 2 – Change in Community Infrastructure and Services (p. 12-152)** "The Project may alleviate some pressures on health facilities in the LSA communities by providing programs for workers on site (e.g., health awareness and education)." → Clarification is required to indicate how the on-site programs would support community-based health services.	Denison to provide additional information of on-site health services that will alleviate community-based health services in NR1 and NR3.
12-028	**12.3.4.2.2 Potential Effect 2 – Change in Community Infrastructure and Services (p. 12-152)** "In addition to offering an appropriate suite of health-related programming and services on site, mining companies have, in the past, developed social responsibility guidelines, which have included donating to community infrastructure and services (e.g., health, education and community development)." → Denison has not identified	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.
12-029	**12.3.5 Mitigation Measures (p. 12-153)** "Mitigation Measures" → 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.	Denison needs to provide additional information in the Final EIS on how the mitigation will alleviate traffic related impacts.

Issue #	Concerns	Recommendations
	→ 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.	

3.15 Section 13 Economics

Issue #	Concerns	Recommendations
13-001	**13.1 Scope of Assessment** **13.1.1 Valued Component Selection (p. 13-5 to 13-6)** "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. Initial direction and input into VC selection was obtained from: • 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." → N/A	In the Final EIS, Denison needs to include the input from MN-S, NR1 Locals, NR3 Locals and indicate if VCs were altered.
13-002	**13.1.3.1 Spatial Boundaries (p. 13-12)** "The economic impacts concentrated within the LSA are expected to be detectable and measurable. Economic impacts extending beyond the LSA are likely to be diffused and undetectable within the broader	Denison needs justify its selection of LSA communities and why no Indigenous Communities of Interest nearest to the site are not in the LSA. The omission calls into question

Issue #	Concerns	Recommendations
	economy. The spatial boundaries were selected based on the consideration of communities where Project recruitment is likely to be prioritized, consideration of previous EAs conducted in the region, and consideration of information shared through key persons in the interview program. The spatial boundaries may be further refined during study implementation based on feedback from regulators, local and Indigenous communities, and the public. . . . The LSA for the assessment of the economy includes the following communities: • ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); • Kineepik Metis Local #9 Lake, Northern Village; and • Beauval, Northern Village." → Denison has not included MN-S or NR1 and NR3 Métis communities in the LSA for the assessment of the economy.	any economic interests of Métis in close proximity to the Project could have. In the Final EIS, Denison to expand its evaluation to Métis
13-003	**13.1.3.2 Temporal Boundaries (p. 13-15 to 13-16)** "The fourth phase of the Project, Post-Decommissioning, is not included within the economic temporal boundaries as the monitoring and inspection activity is expected to be very limited compared to the Construction, Operation, and Decommissioning phases. The economic effect of Post-Decommissioning activities is not expected to be detectable at a scale consistent with the Construction, Operation, and Decommissioning phases. Lasting effects of employment, training and business opportunities may exist in the Post-Decommissioning period (and perhaps beyond), through accumulation of skills and experience at an individual and business level; however, such impacts are uncertain and unlikely to be quantifiable.	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.

Issue #	Concerns	Recommendations
	→ MN-S is interested in understanding all potential Project-related effects during Post-Decommissioning including economic impacts.	
13-004	**13.1.4 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment (p. 13-16)** "The assessment of the Economy VC has been influenced by community engagement, which has identified issues of importance to community members across the COI. These identified issues include opportunities for income, employment and training, business and supply contracts, impact benefit agreements and memoranda of understanding, and the traditional economy (described in Section 13.2.3)." → Denison has not sufficiently engaged MN-S, NR1 communities, and NR3 communities on the assessment of the Economics VC.	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.
13-005	**13.2 Existing Environment** **13.2.1.2 Participation Rate (p. 13-20)** N/A → Denison has not assessed the participation rate, employment rate, or unemployment rate of MN-S or NR1 and NR3 communities.	In the Final EIS, Denison needs to expand the description of the existing environment to include NR1 communities and NR3 communities.
13-006	**13.2.1.3 Employment Rate (p. 13-24)** "Several barriers to employment in northern Saskatchewan have been identified, including lower levels of educational attainment, limited job and work experience opportunities in smaller communities, and the short-term or seasonal nature of many jobs (NLMC et al. 2011)." → Denison acknowledges that several barriers to employment in northern Saskatchewan exist without providing solutions to address and/or mitigate such barriers.	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.

Issue #	Concerns	Recommendations
13-007	**13.2.3 Key Indicator: Traditional Economy (p. 13-48)** "The traditional economy also provides a social safety net and supports a culture of reciprocity. For the Métis in northern Saskatchewan: *'Extra wild meat was always shared in the community and borrowing of staple food products was a common practice. It is often said that the communal lifestyle of the Métis was disrupted by the introduction of electricity and freezers into the Métis communities. Hoarding of food was unnatural, not practical, and virtually unheard of" (Hourie et al. 2006)';"* → The Métis Knowledge study by MN-S has not been completed and included in the Draft EIS.	Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Metis Local #9 on potential Project-related effects to Métis traditional economy throughout the life of the Project. The Final EIS needs to include the Métis Knowledge Study once completed.
13-008	**13.2.4.1 Local Businesses (p. 13-51)** "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." →	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'.
13-009	**13.3 Assessment of Project-related Effects** **13.3.1 Potential Interactions Between the Project and Valued Component / Key Indicators (p. 13-57)** "Communities and residents in the LSA will be given first priority for employment and training and business opportunities followed by RSA communities and residents. The Project will also positively affect the governments of Saskatchewan and Canada mainly through the government payments (e.g., uranium royalties paid to the Government of Saskatchewan, corporation income tax, payroll	Denison to include MN-S and all NR1 communities in the LSA for the economy VC in the Final EIS.

Issue #	Concerns	Recommendations
	taxes). Changes associated with Project employment may also affect the traditional economy of communities in the LSA." → 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.	
13-010	**13.3.1 Potential Interactions Between the Project and Valued Component / Key Indicators (p. 13-58)** *Table 13.3-1: Potential Project Interactions for Economy* → Potential Project interactions for the Economy VC do not reflect feedback shared by MN-S/NR1 and NR3 Locals.	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.
13-011	**13.3.2.1 Potential Effect 1 - Employment and Training (p. 13-61)** "Employment opportunities will be of benefit to the LSA where unemployment is typically high. Training opportunities are expected to begin prior to Construction and continue until Operation. Training programming will be determined in consultation with COI and are anticipated to involve existing training facilities and programs (Process Operation Technical [SIIT] Meadow Lake, Chemical Technology [Saskatchewan Polytechnic]) as well as specific ISR training, where required. Denison will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities." → 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.	Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Metis 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.
13-012	**13.3.2.1 Potential Effect 1 - Employment and Training (p. 13-62 to 13-63)**	Denison needs to provide more certainty and detail within the Final EIS related to local training and employment.

Issue #	Concerns	Recommendations
	"Denison, like other uranium operations, will give preferential consideration across all job openings to residents of Saskatchewan's North (i.e., the RSA), and particularly those from the COI in the LSA. This will include working with the Indigenous COI to advertise jobs broadly (e.g., websites, social media, local radio, northern publications), and assisting northern employees in applying for career advancement opportunities." → Denison has not identified Métis-specific considerations to their employment and training program.	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).
13-013	**13.3.2.1 Potential Effect 1 - Employment and Training (p. 13-63 to 13-64)** "Training opportunities are anticipated to be delivered by institutions in northern Saskatchewan or Saskatchewan more broadly, and will be determined in consultation with LSA communities. Training delivery may involve development partnerships with Northern Career Quest or other relevant entities such as they may exist during the life of the Project, and may include things such as scholarships, summer student opportunities, career counselling or other on-the-job training. These opportunities will be extended to other Indigenous communities and the general public in the RSA after discussions with LSA communities." → Denison has indicated that there will in-house training, as well. It is not clear how this will be delivered.	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. Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to discuss employment and training opportunities and delivery for Métis. 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.

Issue #	Concerns	Recommendations
13-014	**13.3.2.2 Potential Effect 2 - Income (p.13-65)** "Employment and, hence, opportunities to increase income will be provided first to communities in the LSA. Denison will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and will work with the leadership of these communities to assist in determining hiring practices during all phases of the Project." → Initiating efforts with LSA communities excludes most of the Métis communities and keeps them from benefiting.	The Final EIS needs to include additional evaluation of non-LSA communities potential for income benefits.
13-015	**13.3.2.3 Potential Effect 3 - Traditional Economy (p. 13-66)** "This means that the access limitations created by the Project (i.e., 169.9 ha restricted for use) are not anticipated to overlap with areas frequented by most resource harvesters." → Denison has not incorporated Métis Knowledge from MN-S, NR1, or NR3 (except Métis Knowledge from Kineepik).	Denison will need to revise the potential effects evaluation after completion of the MKS.
13-016	**13.3.2.3 Potential Effect 3 - Traditional Economy (p. 13-67)** "Communities have expressed some uncertainty regarding the ISR mining method, as it is a new approach relative to other uranium operations in the region. Despite the low use of the area by resource harvesters, this uncertainty may result in some hesitance to use areas in proximity to the Project site. Denison is committed to continued engagement within the LSA to increase the familiarity and comfort with the ISR method." → Denison has not included details on closure planning including traditional economic activities that can be expected upon decommissioning.	In the Final EIS, Denison needs to provide additional information on closure planning and what traditional economic activities can be expected upon decommissioning.
13-017	**13.3.2.3 Potential Effect 3 - Traditional Economy (p. 13-67)**	In the Final EIS, Denison needs to provide more detail related to worker rotation system mitigation. Particularly

Issue #	Concerns	Recommendations
	"The Project's commuter-rotation schedule (2 weeks on/2 weeks off) is also anticipated to provide participants with the flexibility and sufficient time to participate in traditional activities. Overall, the extent of effects is dependent on personal preferences of individuals and is likely to be balanced out through the income received by employment." → Denison has not engaged MN-S, NR1, and NR3 to understand Métis-specific effects of the Project's proposed commuter-rotation schedule.	considering the identification of reported difficulty in balancing the demands of a worker rotation system with traditional economy activities.
13-018	**13.3.2.3 Potential Effect 3 - Traditional Economy (p. 13-67)** "Measures to mitigate potential changes to land and resource use (Sections 11.1.5 and 11.2.5 in Section 11) would similarly be protective of the activities that support the traditional economy. Given that there are limited changes associated with land and resource use activities, it is unlikely that the Project would have any discernable effect on the traditional economy through this pathway." → 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 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.
13-019	**13.4 Mitigation and Enhancement Measures (p. 13-69)** → Limited listing of potential measures for consideration.	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.
13-020	**13.4 Mitigation and Enhancement Measures (p. 13-69)**	Denison indicated multiple pick-up points but a minimum of 3 points (2 in the LSA and 1 in Saskatoon). In the Final EIS,

Issue #	Concerns	Recommendations
	"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 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 has not engaged MN-S or all NR1 Locals and NR3 Locals to understand employment and training needs to support Métis involvement in the Project.	Denison needs to clarify if pick-up points will be extended to the RSA communities so that they can take advantage of employment opportunities.
13-021	**13.5 Residual Effects Evaluation** **13.5.1.1 Employment and Training (p. 13-72)** "Although the number of jobs will be fewer during Operation than Construction, it will be over a much longer period (i.e., two years for Construction and 15 years for Operation). Decommissioning is also expected to occur over a five-year timeframe with a similar number of jobs available as during Operation. With the implementation of mitigation and enhancement measures in place, residual effects are expected to be low to moderate in magnitude." → 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.	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.

Issue #	Concerns	Recommendations
13-022	**13.6 Cumulative Effects** **13.6.1 Climate Change Considerations (p. 13-80 to 13-81)** Detailed plans and procedures would be developed for the Project that are site specific including: • process monitoring and operational procedures; • mine development and control procedures; • radiation protection plan; • spill and emergency response plan; • traffic and transportation plan; security procedures; • travel management plan; • environmental monitoring procedures; • personnel training procedures; • regular and preventive inspection and testing procedures; and • surface water and flood management procedures. → Denison did not identify how the Métis would be involved in the development, review, and/or implementation of the Project's detailed plans and procedures.	The Final EIS needs to include the detailed plans and procedures for review. The plans and procedures need to include input from MN-S, and NR1 and NR3 Locals.

3.16 Section 14 Accidents and Malfunctions

Section 14 was excluded from the review due to funding limitations.

3.17 Section 15 Effects of the Environment on the Project

Issue #	Concerns	Recommendations
15-001	**15.5 Climate Change**	Denison needs to provide additional detail in the Final EIS describing how the Project will be designed beyond current

Issue #	Concerns	Recommendations
	15.5.3 Effects on the Project (p. 15-19) "The Project has also been designed using engineering best practices and will meet current regulations and building codes." → 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.	regulations and building codes in anticipation of changes to environmental conditions.
15-002	**15.5.3 Effects on the Project (p. 15-19)** "Denison will develop an Emergency Preparedness and Response Program for the Project to address forest fires and extreme weather that may occur." → 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.	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.

3.18 Section 16 Assessment Summary and Conclusions

Section 16 was excluded from the review.

3.19 Appendix 2-A Section 2: Engagement Database Summary Table – Project Description

Issue #	Concerns	Recommendations
2A-001	**Unique ID: 19-EN-CNSC-1.23, Workshop, 2018-01-16 (p. 13)** "Denison hosts the MN-S President, MN-S Minister of Environment/MN-S Region 3 President, and the Presidents of the Métis Locals at the Project site for a site tour and to discuss the	Engagement on the proposed Project needs to extend to NR1 communities. The Final EIS should include proof of this engagement and responses to concerns raised.

Issue #	Concerns	Recommendations
	Project, along with representatives from the Canadian Nuclear Safety Commission and the Province of Saskatchewan, Ministry of Environment." → The site tour on January 16, 2018 only included the following Métis representation: A La Baie Métis Local #21, Kineepik Métis Local #9, MN-S, and Patuanak Métis Local #82. In addition, other Indigenous Nations were present. It is unclear from Denison's table format who asked how long to freeze and would the freeze wall be kept intact for the life of the operation. Denison shared responses to these questions in their Draft EIS.	
2A-002	**Unique ID: 22-EN-EQC-648.1, Presentation, 2022-03-03 (p. 19)** "Event Summary: Denison Mines presented to the Northern Saskatchewan EQC, via Microsoft Teams, on March 2-3, 2022. A schedule, with time allotments for several guests and presenters, was provided for the two day event. Denison's presentation focused on providing the EQC with an update on the Wheeler River Project. . . . Comment (From Interested Party): . . . What are the concerns with groundwater monitoring once mining is done and the freezing comes out?" → 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.	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.

3.20 Appendix 7-C Numerical Modelling: Post-decommissioning Evaluation

Issue #	Concerns	Recommendations
7C-001	**Executive Summary (p. ii)** "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.	'Denison needs to provide further rationale detailing how the "base case scenario" represents a conservative estimate of the conditions present.
	Executive Summary (p. ii) "A suite of parameter and process uncertainty scenarios were performed to evaluate the potential for concentrations to reach Whitefish Lake above the GQSC [groundwater quality screening criteria] threshold values. A suite of 16 additional scenarios is presented; all scenarios indicated that concentrations of most constituents would not exceed GQSC thresholds. The exceptions include constituents with naturally elevated concentrations or naturally outside of the GQSC range (e.g., iron, manganese, and pH), and a scenario with conservative dispersivity values wherein selenium and cobalt concentrations were simulated to exceed the GQSC." → Denison provides no rationale for "conservative dispersivity values" in the Draft EIS.	Denison needs to provide site-specific research to confirm literature dispersivity values are conservative in the Final EIS.
	Executive Summary (p. ii)	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

Issue #	Concerns	Recommendations
	"The simulated conditions indicate that the natural setting has a large assimilative capacity, such that the mass left in solution within the Phoenix ore zone will be naturally sorbed to available mineral sites within the sub-surface, limiting the potential to be transported to Whitefish Lake throughout the future centuries. Sorption and geochemical reaction, coupled with dispersion is predicted to reduce the concentrations of constituents reaching Whitefish Lake to relatively minor variations from background conditions." → 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.	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).
	2.4 Scope of Work (p. 1.6) "As a result, this study is focused on evaluating groundwater quality that would reach surface water bodies during future centuries for areas where groundwater is interpreted and predicted to be at least partly sourced from the mining area." → Denison assumes non-surface reaching groundwater will not extracted or accessed by future generations.	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.
	2.4.1 Groundwater Recharge (p. 2.19) "Groundwater recharge refers to the amount of water that infiltrates through the unsaturated zone and reaches the underlying water table. The rate of groundwater recharge is dependent on precipitation, vegetation, surficial soil type (geology), physiography, and ground surface topography. Recharge is enhanced in areas where the ground surface is hummocky as the potential for overland flow to nearby creeks and rivers is reduced. As noted in the Baseline Report, the estimated average annual recharge rate for the Phoenix site is approximately 156	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.

Issue #	Concerns	Recommendations
	mm/year. The groundwater recharge rates applied in the model are illustrated on Figure 2-7 and range from a low of 100 mm/year on the drumlins and areas where tills are interpreted to lie at surface, to a high of 165 mm/year where sands are interpreted to lie at surface." → 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.	
	2.4.2 Surface Water Features (p. 2.21) "Interaction between groundwater and surface water features are simulated in the model using specified head boundary conditions. Based on the model simulated groundwater level, and the water level assigned to represent the surface water stage, groundwater may be simulated to discharge into the surface water body or recharge the underlying aquifer. Several lakes located within the model domain were modelled using specified head boundary conditions. The water level elevations of these lakes were assigned based on observed water level elevations (within the Baseline Report), as outlined in Table 2-5 and Figure 2-8." → 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.	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.
	2.5.2.1 Water Level Elevations – Quantitative Calibration (p. 2.27) "The model simulated fit to observed water levels is illustrated in a scatterplot (Figure 2-13), which illustrates the level of fit between observed (horizontal axis) and model-simulated (vertical axis) water levels. The line of ideal fit, which corresponds to an	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.

Issue #	Concerns	Recommendations
	exact match between observed and simulated values, is illustrated as a 45-degree line extending through the origin. A deviation of ±2 m is shown on the plots as parallel lines offset from the line of ideal fit, which illustrates that most of the simulated water levels are within 2 m of the observed values. Points that lie outside may be due to generalization of modelled hydrogeologic parameters or errors associated with the field-observed data such as incorrect location coordinates, ground surface elevation, or water level readings. The scatterplot also illustrates that there is no bias towards over-estimating or under-estimating groundwater levels. These trends appear to be consistent throughout the targets with the range in scatter being constant across the range of observed water levels." → 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.	
	2.5.2.3 Statistical Measures of Calibration to Water Levels (p. 2.32) "Mean Error = 0.23 m for all targets. The mean error is a measure of whether, on average, simulated water levels are higher or lower than those observed. Ideally, the Mean Error should be as close as possible to zero. This statistic indicates that on average the simulated water levels are higher than the observed values by 0.23 m. This represents an excellent match to the observed water levels." → Denison provides no rationale/basis for considering a mean error of 0.23 considered to be an "excellent match" to the observed water levels.	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.

Issue #	Concerns	Recommendations
	2.6.3 Groundwater Flow Quantity (p. 2.39) "As noted above, there is a minor component of deep groundwater flow out of the model south toward Russell Lake." → Ecological receptors could potentially be exposed to groundwater flows.	Denison should provide an understanding of deep groundwater as a contaminant pathway to ecological receptors within immediate vicinity in the Final EIS.
	2.7.1 Groundwater Demand (p. 2.41) "Groundwater pumping was simulated in the model to be derived from three pumping wells located outside the ore zone and proximal to the mine operations. The wells were simulated to pump water from the Upper Sandstone Aquifer." → 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.	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.
	2.7.3 Hydrogeological Change Due to Mine Operations (p. 2.41) "The simulated decommissioning phase ends at year 23 on the graph (Figure 2-18), and full recovery of groundwater discharge is asymptotically approached and achieved by year 34 (i.e., 9-years later); 90% recovery is achieved within 4 years (by the end of year 26)." → 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.	MN-S requests that interaction between climate change scenarios and groundwater modelling should be included in the Final EIS.
	2.7.3 Hydrogeological Change Due to Mine Operations (p. 2.41 to 2.42) "The simulated decommissioning phase ends at year 23 on the graph (Figure 2-18), and full recovery of groundwater discharge	Denison should provide simulations that consider the full range of calibrated hydraulic conductivity values in the Final EIS.

Issue #	Concerns	Recommendations
	is asymptotically approached and achieved by year 34 (i.e., 9-years later); 90% recovery is achieved within 4 years (by the end of year 26). However, because groundwater discharge to Whitefish Lake is a small component of the flow through the Lake (i.e., average flow estimated as 1.41 m3/s or 1,410 L/s), the change in water quantity conditions within Whitefish Lake are predicted to be negligible and too small to measure (Figure 2-18; blue line). Consequently, the water quantity impact on Whitefish Lake is expected to be of low magnitude, and for a moderate length of time. This outcome is considered likely as the onsite water use is small relatively to the surface flow through the Lake which has been measured over several years of streamflow monitoring (2011 to 2019)" → It is unclear if the statements made about full recovery and 90% recovery are defendable 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).? ?	
	3.1.1 Groundwater Remediation (p. 3.1) "a) Groundwater Sweep: after injection of mining fluids is stopped, water continues to be pumped from the ore zone through both production and injection wells. This results in native groundwater being drawn into the ISR mining area to replace the solution being pumped out, and thus, flushing the remnant mining solution from the ore zone. b)Groundwater Recirculation with or without amendment(s): after mining stops, groundwater is recirculated through the ore zone, with above-ground treatment of COPCs, as required.	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.

Issue #	Concerns	Recommendations
	Amendments can be added to the recirculation stream to re-establish specific, designed geochemical conditions within the leaching zone. Examples of amending chemicals may be pH-neutralizing or buffering agents (alkaline solutions) or oxygen scavenger solutions, to establish reducing conditions." → 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.	
	5.2.2 Assumptions (p. 5.4) "The regional groundwater system is assumed to have groundwater levels and gradients that are stationary and reflect a groundwater flow system that is in equilibrium. Observed water levels from monitoring wells are assumed to represent long-term average conditions. Thus, a steady-state groundwater flow simulation approach is appropriate." → Climate change as a variable does not appear to have been incorporated into the modelling.	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.

4. REFERENCES

MN-S. 2023. Métis Origin. Retrieved on February 23, 2023: Métis Origin | Metis Gathering.

MN-S. n.d. About the Métis. Retrieved on February 23, 2023: About the Métis Nation | Métis Nation Saskatchewan (metisnationsk.com)

5. APPENDIX

5.1 Meeting Minutes Northern Region 1 (NR1) Community Engagement Session, February 11, 2023

Wheeler River Project – Draft Environmental Impact Statement Northern Region 1 (NR 1) Community Engagement Session, February 11, 2023

Subject	Wheeler River Project EIS
Prepared By	Two Worlds Consulting (TWC)
Location	In person: Round Prairie, SK & Virtual: Microsoft Teams
Groups Involved	Métis Nation Saskatchewan (MN-S) Northern Region 1 (NR1) Northern Region 3 (NR3) TWC Canadian Nuclear Safety Commission (CNSC) Denison Mines Corp (Denison) Government of Saskatchewan (GoS)
Participants	NR1: Laura Burnouf – Regional Director George Natomagan, Local 16 - Weyakwin Larry Lavallee, Local 20 - Timber Bay Allen Augier, Local 50 - Uranium City Lazar Lafleur, Local 19 - La Ronge Curtis Fiss, Local 80 - Stony Rapids NR3: Elder Max Morin MN-S: Brent Laroque, Director of Environment Shannon Landrie-Crossland, Senior Engagement Advisor Roslyn Smith, Métis Guardian Program Coordinator Andrew Spriggs, Lands and Consultation Officer TWC: Eliza Bethune, Technical Review Support Heidi Klein, Technical Review Support Canadian Nuclear Safety Commission (CNSC): Jessica Way, Environmental Assessment Officer Denison Mines Corp (Denison): Carolanne Inglis-McQuay, Director Corporate Social Responsibility Chad Sorba, Director Technical Services Janna Switzer, Director HSE & Regulatory Compliance Government of Saskatchewan (GoS): Brianne England, Manager of Applications, Ministry of Environment Aimann Sadik, Senior Environmental Assessment Administrator
Date/Time	February 11, 2023 (10:00 am – 2:00 pm MST)
Copies to	MN-S, TWC

Purpose of Meeting

- Provide an overview of the Wheeler River Project's ("Project") and related Draft Environmental Impact Statement (EIS).

Discussion

Introduction:

- Shannon thanked everyone for attending the meeting and requested everyone's permission to record the meeting via Microsoft Teams.
- Elder Morin led an opening prayer.
- Shannon led roundtable introductions and provided a culture share.
- Shannon reviewed the meeting agenda.

Denison's Presentation: Wheeler River Project and Environmental Assessment Overview

- Carolanne Inglis-McQuay welcomed everyone, noting this was an opportunity to share information on the Project and answer questions. Thanked Shannon and Andrew for helping Denison prepare their presentation.
- Denison provided a 3D model of the proposed Wheeler River operation on the table for in-person participants, and virtually via PowerPoint, for everyone's review. Noted the photograph pictured on the title page of the PowerPoint illustrates half of the estimated Project footprint during operation. Included in the model is a picture of Whitefish Lake – the proposed released point for 40 cubic meters of treated water, which is the maximum release amount.
- Shared that Denison has been working on the Project since 2006.
- Chad Sorba reviewed the Project location (approx. 7-8 km from Saskatoon), including the controlled Key Lake access road. This road is 7-8 kilometres (km) from Saskatoon.
- Reviewed the Project's schedule of activities during construction, operation, decommissioning, and post-decommissioning: construction is estimated to take 2 years; operation for 15 years; decommissioning for 5 years; and post-decommissioning for 15 years.
- Noted that post-decommissioning phase of the Project will focus on environmental monitoring.

Question: Allen Augier asked what assets and metals are found at that Project site and if there are variations in the deposit? **Answer**: The deposits are very consistent. The phoenix deposit is made of ore and high-grade uranium. Very little other elements.

Question: Lazar Lafleur asked how far off the road the Project is located? **Answer**: The Project site is located 4 km west of Highway 914.

Question: Lazar Lafleur asked how close the Project is to the Wheeler River? **Answer**: The Project is located 30 km north of Wheeler River. Noted Key Lake is located 35 km south of the Project. Shared that the certain portions of the highway will require updating to extend access directly to the Project site.

- Chad noted the Project site is small compared to other uranium mines in Saskatchewan, such as McArthur River/Key Lake.
- Highlighted the well-field area, freeze plant, and process plant locations.
- Noted the mine footprint is 900m x 55m wide.

Question: Lazar Lafleur asked where the treated pond water be released? **Answer**: Treated pond water will be released to Whitefish Lake.

Question: Will mixing water with salt contaminants create an adverse effect to Whitefish Lake? **Answer**: The landfill area is double lined and meets criteria established by the CNSC to prevent leaching from radioactive waste. Radioactive waste will be sent to a certified treatment plant.

Question: Is the double-lined landfill being used for the first time? **Answer**: The in-situ recovery (ISR) mining method for uranium requires no traditional tailings facility. Radioactive material in the Project's landfill would

come from piping in the wellfield. The ISR mining method removes uranium from the iron uranium liquid solution and then gypsum is removed.

Question: Will Denison keep recycling water until it goes to water treatment? **Answer**: Water can be recycled repeatedly in the wellfield. Once water is no longer used in the wellfield, it goes to the water treatment plan and will not be released into Whitefish Lake until the water quality meets standards established by the CNSC.

- Reviewed the ISR and wellfield remediation mining method.
- Noted the phoenix uranium deposit is 400m below surface and ranges approximately 10m in thickness and stretches across 900m.
- Highlighted that the ISR process moves fluid through the uranium deposit.
- Explained two types of injection wells are used in the ISR process: 1) injection wells and 2) recovery wells. A sulphuric acid and peroxide-based solution (same chemicals used at the Key Lake mine) called a uranium bearing solution (UBS) is injected into the injection wells. The UBS travels into the cracks and fissures of the uranium deposit and then up the recovery wells.

Question: Lazar Lafleur noted Denison will not have 100% uranium recovery from the ISR process. Noted he had experience working on a slurry (ISR) project. **Answer**: Denison conducted extensive field testing for 3-4 years to better understand hydraulics of the system to support uranium leaching. The pre-feasibility study shows 85% is recovered depending on the extent of deposits in contact with the solution. Solution is injected into core volumes until an adequate amount of uranium is leached, followed by flushing with fresh water.

Question: Lazar Lafleur noted that the ISR process uses saturates deposits with the solution. **Answer:** Denison confirmed that solution is injected into core volumes until an adequate amount of uranium is leached. This is followed by flushing with natural groundwater to reduce acid levels. If the flushed water does not meet water quality standards, Denison will engage in a remediation stage to treat the water and remove any remaining solution, returning quality to pre-mining conditions.

- Denison noted the process plant is located at the back end of the mill site. The samples containing uranium-bearing solution (UBS) are stored in the freeze wall. Chad showed a picture of the proposed freeze wall and described the technology and construction model informed by past projects in Saskatchewan.
- Denison described the solution treatment process and how UBS is processed into yellowcake. Closed loop circle.

Question: Brent Laroque asked where the original water for the solution comes from? **Answer:** The water is sourced from groundwater or lake water.

Question: Lazar Lafleur asked how much water is required? **Answer:** Denison will require 40 cubic metres of water per hour at a rate 1% higher than what is being injected to ensure continuous waterflow.

Question: Minister Laura Burnouf asked what would happen if the freeze walls would melt? **Answer:** Waterflow is directed towards the recovery well and not towards the freeze wall. The freeze wall is a tertiary level of containment, 10 metres thick, designed according to previous mining operations (Cigar, McArthur) in Saskatchewan. It will take 12-30 months to build and continuously grow up to 40 metres wide over the project lifespan. The only time the wall will melt is when it is turned off during closure. This will only occur when the fluids inside the mining area achieve standards to be released.

Question: Elder Morin emphasized that Métis should be involved in the monitoring process. Noted that the precedent of Cluff Lake is a concern. Who will be monitoring the water to ensure environmental contaminant/radiation safety to water and animals? **Answer:** CNSC will be monitoring, and Denison will provide regular reports to the GoS. Denison notes there will be opportunities to discuss transparency and monitoring with Métis and that there are multiple ways to approach monitoring.

- Ministry of Environment noted that the GoS will oversee compliance, conduct inspections, and annual monitoring. Environmental protection officers will be present on the site. Noted that community participation is important in monitoring to ensure trust in reported results.

- Jessica Way from CNSC noted that CNSC will similarly conduct inspections regularly and report to CNSC independently of Denison and conduct spot testing. Noted that CNSC would encourage a monitoring partnership with MN-S.

Question: Lazar Lafleur asked if there are any initiatives for Indigenous people to monitor their lands? To date, no initiatives have been followed through and there is a separation between GoS processes and Indigenous peoples. Northern communities are conducting monitoring of the land to ensure it is done correctly. Another environmental monitoring program course at the university in La Ronge would help this. **Answer:** CNSC has independent monitoring and discussions with local Indigenous communities to do monitoring in areas where there are places and species of interest. Manitoba and Ontario have undergone independent monitoring in response to requests from Indigenous groups and CNSC is open to more opportunities like this. For example, the Eastern Athabasca Regional Monitoring Program between CNSC, GoS, and First Nations.

Question: Is the Eastern Athabasca model something that can move westward? **Answer:** This is a collaborative and transparent model with publicly available data sharing that is not a one-size-fits-all approach. CNSC has also had independent environmental monitoring programs involving communities, which are built upon feedback from communities, such as land guardian programs. In-person reports are sent every 4-6 months and approaches are modified based on feedback.

Question: Elder Morin asked how to ensure locals are comfortable? **Answer:** Examples put forward by Denison and CNSC and the province will be open to feedback and modified to ensure people are comfortable with the approaches.

Question: Allen asked if treated water is filtered before being released into the environment, considering there are no solids going into the environment? **Answer:** The details of water treatment are still being determined. There is a filtration system and holding pond where water will be tested before release.

Question: Lazar asked about the discharged water. **Answer:** Denison has completed an assessment of what discharged water will look like and how it will settle into sediments over time. Further details will be available.

Question: Brent asked what the release standards are for Denison? **Answer:** End of pipe criteria, as per Canadian surface water quality guidelines, CCME and GoS.

- Chad narrated the project video "Project Technology: Video Overview". The water that flows through the project site flows southeast. Provided an overview of the groundwater freezing process and building of the freeze wall, and the use of directional drills. Denison will use 312 injection wells over 300 freeze holes, drilled 2 metres apart from the well. The monitoring wells will be located below the deposit area.

Question: Lazar asked if there would be more wells downstream? **Answer:** Chad noted the mining phase determines positioning of the wells.

- Brent noted that the monitoring of wells could take hundreds of years to detect leakage.
- Chad affirms that groundwater monitoring wells can exist at 350 metres in depth but that groundwater moves faster closer to the surface. Results are generated at this depth. Initial tests will confirm the monitoring network across the mining system.
- Lazar noted that the system appears sufficient, in terms of following ISR precedents from other countries and applying methods approved in Saskatchewan.
- Minister Laura Burnouf requested clarification on what ISR is. Chad confirmed ISR is in-situ recovery.

Question: Elder Morin asked if this is the same technology used for oil fracking? **Answer:** Denison explained the difference between oil fracking and ISR. Fracking for oil is done under extremely high pressures; Denison's project is 60 – 100 PSI compared to 500 PSI for oil fracking. ISR is predictable drilling and has an extensive pre-monitoring and monitoring network during extraction.

- Carolanne reviewed the regulatory process. Exploration work for Denison started in 2008 and continues at present. Baseline studies started in 2016 to gather plants, animals, and water quality information to develop the EA application, drafted in October 2022. The public review period ends February 20th, preceded by

provincial comments submitted in January and federal comments due in March. The permitting and licensing process will begin in 2023 and may take up to two years. Upon approval by the federal and provincial governments, this two-year estimate is being used as the point until construction begins.

Question: Lazar asked what was included in the baseline studies, if only Key Lake was considered? **Answer:** Baseline studies focused on the project area.

- Carolanne reviewed the environmental assessment approach and methodology. Baseline environmental conditions were informed through third party consultant studies. Provided an overview of predicting project effects, mitigations to reduce effects, and how monitoring will inform predictions in the EA to confirm potential impacts to water quality, plants, wildlife, and other VCs.

Government of Saskatchewan (GoS) Presentation: Environmental Assessment Regulatory Process

- Breanne England and Aimann Sadik from GoS provided an overview of Denison's participation in the GoS EA regulatory process.
- The *Environmental Assessment Act* (2018) is regulatory basis for major projects. Primary role is to assess the effects of major developments and potential impacts to the environment, ensuring the public is aware of the Project before the Minister makes a decision on approval.
- Notification to the public was completed in 2019 after the determination that Denison was entering into the EA process.
- Provided overview of the Duty to Consult (DTC). GoS follows the *Consultation Policy* framework. The DTC determines if the proposed project has the potential to impact Treaty and Aboriginal rights, traditional uses of lands and resources, and right of access to unoccupied Crown land. In 2019, GoS notified Denison of the DTC and to engage with Indigenous communities on how the project may impact Indigenous rights. Denison then developed a Terms of Reference (TOR) to describe the proposed project and how they will work with communities to understand how the land is being used and what is valuable to communities.
- Provided overview of regulatory agencies the GoS collaborates with on an EA, the technical review process, and public and Indigenous review periods.
- At present, Denison is funding consultation activities independent of GoS. MN-S, NR1 and NR3 will be able to provide comments to the GoS consultation report 30 days after posting. Shannon noted that the budget provided only allows for community meetings, not a technical review of the consultation report. Lazar agrees this is a limited timeframe.

Question: Shannon asked if there will be funding available to complete a technical review of the consultation report? MN-S has applied for GoS funding available, but it has not been received. **Answer:** Brianna noted that the Consultation Policy framework is under review and has also heard funding is insufficient from other communities. Denison will have to fund the work.

- Lazar echoes Shannon's sentiments that this funding does not provide enough to complete a fulsome technical review and conduct engagement.
- Brianna reviewed the Participation Funding program (PFP), the adequacy of consultation requirement (did the proponent provide an opportunity for communities to share comments and feedback on potential adverse impacts?) and the process of the Minister's EA decision.

Question: Lazar asked who will be doing Indigenous engagement reviews? **Answer:** Brianna noted that Denison is working with the community to develop this process.

Question: Shannon noted that many proponents have collective public engagement sessions and consider this First Nations and Métis consultation. Asking to confirm if Denison is seeking a public session or a Métis-specific engagement? A public session should not be considered consultation. **Answer:** Brianna noted that it is up to Denison to conduct engagement to the public and Indigenous groups.

- George Natomagan noted the approach should not be contacting individual organizations within communities. He is a mayor, and a Métis Local and these represent different interests. Many people in northern communities hold multiple roles. Métis and First Nations should be separately consulted from the public, and Métis and First Nations separate as well. Section 35 rights are more in depth than a public engagement session can capture. The importance is knowing that the GoS and proponents are involved in

hearing issues, comments, and feedback from the community members themselves and grouping people together causes confusion. Noted that presidents not receiving letters is also an issue.
- Lazar echoes these sentiments and notes that many people have multiple roles in communities and each role represents a different relationship being built. Speaking with multiple people at GoS in the same role prevents relationship building. Métis should have a role. Shannon notes that they can only explain the same issues so many times. Looking forward to new policy changes from 2022 to see how these changes will be implemented and if Metis recommendations have been considered.
- Breanna thanks and acknowledges the comments. Noted that the Minister of Environment implements the policy rather than creates it. Shannon emphasized the importance is in the relationship.
- Finished the presentation with an overview of the permitting and licensing process.

Government of Saskatchewan (GoS) Presentation: Environmental Assessment Regulatory Process

- Jessica Way (CNSC) went over the presentation agenda and explained CNSC's role as a science-based regulator. The primary purpose is to use regulations to understand risks to the environment, Canadians, national security, of major projects. The main regulation that mandates CNSC is the *Nuclear Safety and Control Act.*

Question: Lazar referred to Rabbit Lake and asks what was done to protect people from the environment and ensure safe fishing? **Answer:** Jessica noted the approach would be to immediately return to the site for monitoring. She is unfamiliar with this project but will provide further information to Shannon.

- Provided overview of the types of activities CNSC regulates, including uranium mining and processing, transportation, nuclear research, nuclear power generation, nuclear medicine.
- Denison will be granted a license to operate by an Independent Commission. The Commission has 7 members at a time and CNSC does not elect them, and they are not part of government. The hearings held by the Commission include CNSC staff, proponents, the public, and representatives from Indigenous groups. Denison will eventually have to present at a hearing in order for an EA decision to be made and at this hearing individuals are welcome to present. Commission decisions are based off information provided by all presenters.
- Reviewed the roles of CNSC staff. Recommendations made from CNSC are based on technical assessments provided by applicants, which are reviewed by staff with scientific expertise. CNSC staff also ensure if a license is granted, that regulations are in place to ensure project safety – the primary concern of CNSC. The CNSC does not promote the nuclear industry, select project sites, exploration, or have a role in revenue sharing or economic development. What we do slide – primary concern is safety.

Question: Lazar asked what the CNSC does to value Indigenous Knowledge? **Answer:** Jessica noted that during the EA process, information shared by Indigenous groups are incorporated into CNSC's work. For example, the independent environmental monitoring program has included consulting with Indigenous groups potentially impacted by nuclear facilities and ask them to identify where sampling should take place. CNSC also reflects on information shared and ensure Valued Components identified by Indigenous groups are reflected in applications.

Question: Lazar asked if this is done before or after the assessment? **Answer:** Jessica noted this occurs during all phases of the assessment or at any point during the process where information from Indigenous groups is received.

Question: Lazar asks if this process is integrated across all CNSC departments or is siloed into a specific department. **Answer:** There are divisions within CNSC that review specific documents. For example, the environmental assessment division participates in the EA and conducts environmental risk assessment reviews periodically to ensure the facilities are adhering to environmental protection programs. The Industry Stakeholders Relations division more directly handles Indigenous Knowledge because this department maintains relationships with Indigenous groups. There are main contacts, but everyone is involved in the work, and there are department-wide processes that protect Indigenous Knowledge and this is integrated into the work they do.

- Environmental Reviews are central to CNSC's work. Reviews follow legislation separate from CNSC (e.g., *Impact Assessment Act* (2019)). Coordination and joint reviews with the province occur as much as possible.

- Jessica overviewed the EA process. The Environmental Protection Framework is embedded within the EA process. The CNSC has an obligation to ensure Indigenous peoples have an opportunity to participate in the process.
- Reviewed the importance of Indigenous Participation. CNSC has been meeting with MN-S since 2019 and speak on a monthly basis at a minimum. These communications help incorporate Indigenous Knowledge into CNSC's project work.

Question: Lazar asked if Indigenous participation procedures are available online, including how to participate in hearings and apply for funding? These should be available for review. **Answer:** The website contains high-level descriptions. CNSC follows regulations around what document should be posted on the website, and emails are sent about public funding and participant funding. All steps of available documents and funding are communicated.

Question: Lazar asked which steps Indigenous people are involved in? **Answer:** CNSC has regular communications with MN-S on a monthly basis for Denison. Multiple processes during an EA and CNSC engages Indigenous peoples at various stages, for example, for the release of annual regulatory reports, Indigenous peoples are involved before and after.

- Overviewed the participation process for the Wheeler River Project. MN-S was sent communication during the first step to inform that the Project Description has been received and comments are open to understand the issues and concerns around the project. This early engagement informs the assessment and is ongoing throughout the EA. Currently, CNSC is trying to coordinate with GoS as much as possible. Comments on the EIS are due by February 18th.
- CNSC is looking at how Denison captured these concerns in the EIS and any proposed solutions or mitigation. If there are concerns unaddressed, CNSC is looking for explanations why.
- Shannon noted there was not enough time for MN-S to engage community members during the 90-day comment period, especially because of the holidays. The extension for comments to February 18th was not enough time to coordinate engagement with multiple project EIS reviews (e.g., NexGen Rook I) occurring at once. Shannon asked if there is more time to engage after the draft EIS is finalized.
- Jessica noted 90 days is the longest timeframe for a comment period. CNSC will continue to be available and have discussions up to the hearing date, particularly the regular monthly conversations with MN-S. The February 18th deadline is not the last time to raise concerns. Noted that an extension for the EIS technical review may be possible and invited MN-S to speak offline about this.
- Shannon notes that there are other opportunities to engage with communities after EIS submission, as is being done with NexGen. Jessica notes the CNSC welcomes as many opportunities as is wanted by communities; CNSC assumes more feedback will be shared with Denison and that all information identified during the EA process will be included in the CNSC's report to Commission to influence decision making.
- The decision for the application will be posted on the website, but CNSC will also share this with MN-S directly and MN-S will likely know before public notification. Jessica notes her availability to discuss these items further at any time.
- Shannon notes this is the beginning of a long journey. MN-S is working with the support of Regional Councils, the legal team, Locals, and TWC to get information to CNSC. Noted that CNSC works well with MN-S on community engagements and also provides funding and this is better than the GoS process.

Question: Lazar reminded that Métis want to be involved in ongoing oversight and compliance. What initiatives are there for this? **Answer:** Jessica notes the environmental monitoring progress has unique initiatives through the CNSC to support Indigenous-led processes. Programs are developed on a yearly basis. CNSC prioritizes discussions with communities to identify concerns and land use happening in a target area.

Question: Shannon asked if CNSC is developing programs and conducting monitoring this year, will local presidents be able to attend and/or share information? **Answer:** Jessica noted that sampling programs are built upon information from proponents, and CNSC reaches out to Indigenous groups in the area to ask for feedback on sampling plans. Indigenous groups can review plans and participate in sampling, i.e., during hunting. CNSC invites members to participate in funding as much as possible. CNSC can send more information to MN-S and Locals through email.

- Shannon will reach out to Jessica after discussing this with NR1.

- George asked if Adam is still employed with CNSC and Allen noted they have worked together in the past. The value of building a relationship with someone from CNSC is valuable and this is what MN-S and Locals would like to see in the Wheeler River project.
- Lazar noted that the meeting with NR3 on February 12th should have representation from all regions and the Independent Environmental Monitoring Program.
- CNSC has a project distribution list and can include anyone from NR1 and NR3. Shannon will share all NR1 and NR3 emails with Jessica to add to list.

Métis Nation Saskatchewan: Next Steps

- Shannon led the conversation on next steps. Community engagement for February 18th will include NR1 and NR3 Regional Council, board members, and community. Leadership Locals must be informed in order to engage the community. Noted there will be more opportunities for engagement after this date.
- Heidi Klein (TWC) provided an updated on the EIS Technical Review. It will be reviewed by MN-S on Wednesday and TWC will revise the report for completion by February 18th.
- Minister Laura Burnouf inquired about the status of the MKS Project Coordinator. Heidi noted the job description has been reviewed and sent to HR. The plan continues to ensure the position is filled in March.
- Lazar inquired about the Elders Engagement Forum. Heidi noted that this can be discussed after the meeting. It will focus on planning and the purpose of the Metis Knowledge Study and an update should be provided to Regional Councils and MN-S in the next few weeks. The Coordinator will help identify what Elders will be interviewed.
- Shannon noted that the next step is meeting internally and working together on the TLU and finalizing the EIS submission. Shannon suggested a virtual meeting to discuss the EIS and answer any questions.
- Minister Laura Burnouf gave thanks for the meeting.
- Allen gave a closing prayer.

Actions

MN-S:

- Shannon to request further information on sampling program participation to Jessica Way and the monitoring program at Rabbit Lake (CNSC).
- Shannon to send NR1 Locals and NR3 Locals emails to Jessica Way (CNSC) for email list.

5.2 Meeting Minutes Northern Region 3 (NR3) Community Engagement Session, February 12, 2023

Wheeler River Project – Draft Environmental Impact Statement Northern Region 3 (NR 3) Community Engagement Session, February 12, 2023

Subject	Wheeler River Project EIS
Prepared By	Two Worlds Consulting (TWC)
Location	In person: Round Prairie, SK & Virtual: Microsoft Teams
Groups Involved	Métis Nation Saskatchewan (MN-S) Northern Region 3 (NR3) TWC Canadian Nuclear Safety Commission (CNSC) Denison Mines Corp (Denison) Government of Saskatchewan (GoS)
Participants	NR3: Elder Max Morin Mervin 'Tex' Bouvier - Regional Director Percy Kenny, Local 82 – Patuanak Joe Daigneault, Local 37 - Beauval Sipisihk Mike Natomagan, Local 9 - Pinehouse Lake Louis Gardiner, Local 21 - Ile-a-la-Crosse Patsy Laliberte, Local 38 - Jans Bay Eugenie Lafleur, Local 67 - Dore/Sled Lake Lisa Maurice, Local 176 Sandra Bouvier, Local 41 - Cole Bay Fred Kenny, Local 174 - Canoe River Kim Burnouf, Services Director MN-S: Brent Laroque, Director of Environment Shannon Landrie-Crossland, Senior Engagement Advisor Matt Vermette, Chief Operating Officer Madison Smith, Métis Guardian program coordinator Andrew Spriggs, Lands and Consultation Coordinator TWC: Eliza Bethune, Technical Review Support Heidi Klein, Technical Review Support CNSC: Jessica Way, Environmental Assessment Officer Denison: Carolanne Inglis-McQuay, Director Corporate Social Responsibility Chad Sorba, Director Technical Services Janna Switzer, Director HSE & Regulatory Compliance GoS: Brianne England, Manager of Applications, Ministry of Environment Aimann Sadik, Senior Environmental Assessment Administrator

	Regrets: Kelvin Roy, Local 5 - Green Lake
Date/Time	February 12, 2023 (10:00 AM – 3:00 pm MST)
Copies to	MN-S, TWC

Purpose of Meeting

- Provide an overview on MN-S' technical review of the Wheeler River Project's ("Project") Draft Environmental Impact Statement (EIS).

Discussion

- Elder Morin led an opening prayer.
- Shannon led introductions and provided a culture share.
- President McCallum said a few words about partnership and key items to discuss (e.g., economic benefits to Métis communities from project work; industry represents investors, which represents money, and communities are not considered).
- Denison representatives introduced themselves.

Denison's Presentation: Wheeler River Project and Environmental Assessment Overview

- Carolanne Inglis-McQuay (Denison) welcomed everyone. Thanked Shannon and Andrew for helping Denison coordinate the meeting.
- Denison provided a 3D model of the proposed Wheeler River operation. The proposed Project Footprint is smaller than other uranium mining projects in Saskatchewan. It is located between McArthur River and Key Lake. Included in the model is a picture of Whitefish Lake behind the proposed footprint.

Question: How far is the project from the river? **Answer:** Chad Sorba (Denison) noted that the Wheeler River itself is 28 kilometres (km) south from the Project. Denison named the project "Wheeler River" because in 1978, the project area once extended close to the Wheeler River, but today it is much smaller.

- Denison provided a review of the project stages and schedules. Planning for construction, operation, decommissioning, and post-decommissioning is underway.

Question: Has there been testing done to date? **Answer:** Denison conducted extensive field testing for 3-4 years to better understand hydraulics of the system to support uranium leaching. The pre-feasibility study shows 85% is recovered depending on the extent of deposits in contact with the solution. Solution is injected into core volumes until an adequate amount of uranium is leached, followed by flushing with fresh water. There has not been full scale mining exploration. The purpose is to determine how and where groundwater is flowing.

Question: What recovery was identified from the pre-feasibility test? **Answer:** The goal of the test was to identify how uranium could be recovered, not the percentage of recovery. The purpose was to demonstrate how mining solution could be moved from one well to another. The tests showed this technical mining method was successful in that fluids could be controlled.

Question: What is the total recovery of the agents used? **Answer:** The percentage Denison was able to recover from the tests was 85%, though this number may be slightly diffused and is based on modelling. The test area was returned to a stable pH level after testing. The remaining agents were able to be recovered.

Question: Was Denison able to prove that the agents were contained? **Answer:** Yes. Monitoring is ongoing.

Question: Is there a disaster relief program in place if agents were released to the environment? **Answer:** Carolanne noted that there are 15 regulated provincial criteria for groundwater quality to ensure there is no leaching into the groundwater system, and no effect to downstream water bodies, to be considered environmentally protective. The tests met these criteria. Monitoring is ongoing.

- Carolanne noted that part of the permitting process is to ensure monitoring programs are sufficiently funded even if Denison were to walk away from the project – then the Government of Saskatchewan (GoS) would take up the monitoring responsibility.
- NR3 expressed interest in how communities can be involved in monitoring and have a training program in place for Locals to conduct their own assessments. Understand that Denison/GoS have their own monitoring system. Métis need one too. NR3 echoes sentiments heard by NR1 leadership the day prior. With Pinehouse, there was a monitor that visited the project site 3 times and had full access, and NR3 wants to move in this direction. Understands the interest around transparency and broader involvement from the communities to be involved in monitoring. CNSC has a program.
- Jessica Way (CNSC) is the EA lead for the Project. Noted there is a CNSC Independent Environmental Monitoring Program (IEMP) where the CNSC goes to site and does sampling in publicly accessible areas. CNSC is trying to reach out Indigenous groups as they are developing sampling plans to make sure the areas and species of concern are being monitored. Jessica is not deeply involved with IEMP, but conversations are being had to involve MN-S more in this work. Mentioned the Eastern Athabasca Regional Monitoring Program (EARMP) and more work is being done to progress this elsewhere.
- Métis have a cultural science and live in a modern world and follow modern science for decades. Cultural science is the people that live off the land. They know more about the assessment than modern science itself. Métis need to watch over the species, water, and land using cultural science. Want Denison and GoS to understand that cultural science is very important.
- Carolanne said they understand there is another lens and worldview to bring to monitoring. Working with communities brings information that doesn't come from CNSC or Denison or GoS, and is outside their lived experience.
- Billy Gardiner noted that there was a moose release a couple days ago from the Cluff Lake remediation program. In terms of Orano's application to release Cluff Lake back to GoS, the issue is that Métis should also have traditional hunters and users monitoring and this should not be funded by taxpayers. For Cluff Lake, Northern people are not included in monitoring to ensure it is returned to a natural state. Métis aren't aware of what is going on – how to know the water is safe and drinkable? Recalls when a traditional trapper went to the Cluff Lake site and got pushed out. These are qualified people to monitor.
- Denison reviewed the in-situ recovery (ISR) slide and explained the technology is being used globally. This is similar to the potash industry in Saskatchewan, where holes are drilled to move fluids from one area to another. This is the first ISR uranium mine in Saskatchewan.

Question: What builds the gap of the uranium window? **Answer**: Chad explained that this is not the same as a traditional mine. ISR process leaches high-grade uranium using the solution. If leaching is successful, you 40% the "block mass" is reduced while some areas are more compressed. Rock mass will be kept in tact by a network of "sponges". There will be small pockets into the groundwater to maintain integrity.

Question: Can Denison guarantee that? **Answer:** The work over the last 5 years will help de-risk but nothing is guaranteed. Testing started with smaller holes and increased pressures over time. In 2021, the tracer test using saltwater did not determine any displacement on a small scale.

Question: There is a technical side of monitoring and natural state monitoring. Is there a percentage Denison considers? For Cluff Lake, there was a disconnect between what was technically sound versus what land users experienced on site. **Answer:** All work to date has been done focusing on the technical side and calibrated back to a baseline understanding of groundwater conditions going back many years. Detailed monitoring was done in advance of tests to understand how much neutralizing and flushing needs to be done to return water to acceptable pre-mine conditions. The surface may see a maximum movement of 7.5 centimetres (cm). Monitoring is done to ensure models are acting according to predictions based on annual sampling.

Question: How would Denison prove air quality is returned to a pre-mining state? Cluff Lake hurt the environment. **Answer:** Air quality experts review the emissions released from the project and follow air quality criteria set by provincial and federal requirements. ISR does not result in a ton of rock, which is a big contributor to air quality impacts.

- There is trust missing between Métis and CNSC/GoS in terms of what is considered environmental protection. Northerners have not been involved in the monitoring process and this is a big piece missing. MN-S needs to set up a monitoring committee or department so there are people on the ground to assess

operations. Métis have better knowledge and understanding of the process. As ISR is a new process, the trust issue stands out. Denison having a vested interest in the North is the bottom line.
- Brianna (CNSC) noted that the EARMP is an example of community-involved monitoring initiatives being discussed.
- Shannon noted that big piece missing from EARMP is communities. The communities collect the samples. More examples are out there that need to be looked into.

Question: Does sampling mean on-site, and what do laboratory tests do? **Answer:** Water and animal samples are tested in labs in Saskatoon.

- Is there potential for samples to be contaminated during transfer and what about a lab in Northern Saskatchewan? There are people in the North can do this work. Highlights the issue of trust. With Northern involvement there is assurance that whoever is looking at the samples has vested interest in the North.
- Brent noted his experience in Western science monitoring at a hazardous waste facility. He understands what Denison's groundwater modelling consists of. Reviewed lab sampling and testing process that prevents contamination, and the labs are credited. They are third parties. The data would be given back to Denison.
- Shannon noted that there were biodiversity surveys and monitoring done for Orano's Long Term Monitoring and Management Plan (LTMMP) and MN-S only participated in the technical review. Cluff Lake was not an example of building trust and inclusion. Need to be involved with leadership, with collaboration and inclusion in the beginning of the process.
- NR3 noted there is more that needs to be done, with more Métis involvement and community investment. Métis will be present on the land forever and need to be comfortable with their neighbors. Concerns about waiting until monitoring results are shared that could be disastrous. There is a history of being taken advantage of, and violation, by the Church and the Canadian Government, and this is still felt today. Want to build trust within communities and with the government. Métis want their own plan in place and not have their people die if the government/proponent plan isn't working. This is Métis land, species, territory. Cluff Lake was a disaster and now the ore is running into rivers and killing people. Métis need to be monitoring right away in the right way.
- Jessica acknowledges the message. Emphasizes the importance of opportunities to change things. CNSC wants to improve the work and values what is shared at hearings to the CNSC Commission. This has an impact. Provided thanks for sharing.
- Elder Morin noted that Denison is a mining company. The provincial government issues a lease. Is NR3 being asked for a blessing or does the CNSC/Denison/GoS want Métis to be involved? Recalls attending the Saskatchewan Research Council and not being told of how Key Lake was shut down because the mill flooded. No notification of possible contaminants and impacts to wildlife. These are the stories that are heard in the North. Métis may have opportunities for contracts and employment, but monitoring is a big question. Funding is provided from the province to monitor, but Métis are not partners. Recalls how a community member went to visit the trapline and hunt ducks but could not eat the ducks because they were sick. The fish can tell if something is wrong – they are the stewards of the land, they will know if beavers have no food. There is a history of not being involved to make sure things are being done safely from Métis perspective. Things need to be done safely so 50 years from now children are not dying from radiation in the river. If Denison wants to support the North, partner with Métis. Should have been working together right from the beginning and there is no interest in working against the companies but it is supposed to be collaborative. It is hard to trust the government because they have not contributed to communities. Forests are being clearcut, mining companies are abandoning mines. It is hard to trust CNSC after what has happened with Cluff Lake. Wants to see safety for Métis people and the environment to continue living. Monitoring with Métis people is key.
- Carolanne acknowledges this important point and moving forward will look at the Cluff Lake monitoring regimes. Noted that the question is how things will be done, and how they will be done differently. Looking at monitors going to the site now as the foundation. Transparency in testing is needed. Understands that tension exists. There is a benefit at this point of the Wheeler River Project to move through the regulatory phase and create processes for clarity around what is being monitored. Noted it is still very early in the process.
- NR3 noted Cluff Lake revenue sharing agreements were not fulfilled and that is where the trust issue came in. When uranium mines came to the North, what was told is not what happened.
- The engagement deadline is not enough and NR3 wants an extension to allow more time to look at all of the information, collaborate with NR1 as one voice. Noted that NR1 should be at this meeting to hear their questions.

- Shannon noted CNSC provided a 2-week extension on MN-S' EIS Technical Review to allow more time to review TWC's report. Noted that there are different words and understandings between Indigenous science/knowledge and Western science and need to bring both together to make things better. More data always improves things. Involvement with surveys and birds and this will build trust.

Government of Saskatchewan (GoS) Presentation: Environmental Assessment Regulatory Process

- Brianne introduces Aimann Sadik (GoS), the Senior EA administrator working on the Project.
- Denison provides an overview of different project components and the proposed locations for each components. Mentioned the project will be conducting up to 15 years of mining over 5 phases. When compared to traditional mine/mill site, it's a fraction of the project footprint. The entire area will be approx. 1km x 2.5 km. Carolanne pointed out there is an effluent release and the holding pond is the entrance point to Whitefish Lake.
- Provided an overview of the ISR process and wellfield remediation. Injection wells will go into recovery wells and leaching will occur in place. The recovery well pumps liquid uranium to the surface, to the process plant at the back-end of the mill. There is no crushing or grinding required; the process occurs in-ground. This is a closed-loop cycle. The process continues in a closed loop cycle. Freeze walls have a third layer of containment to keep mining solutions in the mining area. Monitoring in all areas, including in the freeze wall. Exact positions to be confirmed. The freeze wall surrounds the entire deposit. Cross wells divide the deposit into 5 areas.
- Mining methodology is built on phases. Phase 1 starts in the middle and moves outward over the 15 year mining life. Small scale and small steps.
- Denison notes that freezing technology is not new. This was used at Cigar Lake. The process creates a key-sized hole to install piping, where brine is circulated and brought down to -35 degrees to freeze groundwater in place, which creates the freeze wall. This is a combination of two known technologies – not novel technologies.
- Reviewed Project Technology Processing for UBS (uranium bearing solution). During the process, iron is removed and the solution is thickened to remove impurities. Recycled water is treated and released back into the pond. The rest undergoes the leaching process. This is a simple process compared to other conventional mills and there are not a lot of impurities.

Question: Is this different in different areas? **Answer:** There are not as many circuits in an ISR process.

- Video overview of Project Technology: Deposits are 1.5 km off Highway 19. Access road will be built and is 5.5 km long. Right now, Denison is looking at the Pheonix deposits. There are two zones (A and B) for this deposit.

Question: What is the difference between Zone A and B? **Answer:** This is a naming convention to identify the areas that will be drilled. Phases 1-5 as described prior will occur at each zone.

- In the ISR process, Denison will drill vertical holes 400 m depth for groundwater monitoring and enhancement with horizontal drills as an extension of the drilling process. Slinky drills occur around 2-4 metres away. This is done to pinpoint exact drilling locations and make the process controllable, while giving additional access to fractures in the deposit. USB flows towards the recovery well and it becomes uranium containing solution once pulled up. Entire process is being controlled by the injection system. Always controlling the fluid through hydraulic containing. Wells will be positioned to detect the movement of fluid inside and outside the mining area. Testing shows data wells should be 10-15 metres in depth.
- Provided overview of the ISR process. There are no tailings like in traditional mines. Precipitates will be removed off-site; calcium sulphate is a by-product. Chad noted that there are two pads on the site side-by-side near the wellfield.

Question: What is the spillproof program in place? **Answer:** The waste material is staying off-surface during the mining operation and will be on double-lined pads, pumping water that comes off the treatment plant. Gypsum pile will get covered in place. The iron sulphate will be transported off site.

Question: What is the Gryphon deposit? **Answer:** Carolanne noted that it is located 3km north of the Phoenix deposit. Although there are two known deposits, we are only advancing the regulatory and EA process for the Phoenix deposit.

- Janna Switzer (Denison) reviewed the regulatory process. The GoS Ministry of Environment assesses potential impacts to people and environment. The EIS (6000 pages) was submitted in draft form and submitted to provincial and federal governments. Denison is waiting on comments from Indigenous groups and the public. The EIS will not be finalized until questions are answered by those parties. Likely 2.5-3 year process before the hearing in front of the CNSC Commission will occur for licence approval - one from CNSC and another permit from GoS. Therefore, in 2.5 years Denison is planning to begin construction.
- The anticipated production rate is 600 million pounds per year.
- Reviewed the EA Approach and Methodology. Mitigation measures are being developed to avoid individual environmental effects. EA will determine the overall change in the environment. Denison will continue to do both daily and monthly samples to compare results from what is predicted. If there is a difference, changes will be made to the project.
- Review of different Valued Components (VCs) being considered for the project. Understand post-mining impacts to groundwater or potential for it move up to surface water. Doing a lot of the process underground. Aquatic environment looks at fish and fish habitat quality. Terrestrial looks at impacts to wildlife.

Question: Is there a breakdown of all the VC's? Wondering about community investment outside of training and jobs. **Answer:** The EA will look at potential for business opportunities and how much money comes into those communities. This is included in the EIS.

Question: Are there more accessories to address justice, and different types of education? **Answer:** Carolanne notes this may or may not be reflected in the baseline information of the EIS, as it is dependent on areas of concern. There is information for a baseline on education in a particular area and in terms of how the Project could change or improve those areas.

Question: What about improvement of the community, so money flows from the mine to help with social and mental issues? **Answer:** Half of the EIS does consider community well-being. Part of that is housing considerations and impact of rotational schedules on people, and all the parts that put our communities in a good place – or a place where they are struggling. The EIS describes the conditions of what information is known and how the Project fits within community drivers, like quality of life.

- Denison has handouts of VC summaries. Carolanne wondered if those and the 14 page summary of the EIS can be provided to MN-S. Shannon agreed.
- Joe noted that conversations yesterday discussed the HR Development Agreement as part of the surface lease agreements. Where is HR development in the EA process/methodology? The EA references social and economic impact, and HR development should be included and highlighted in the assessment process. Training is very critical. There is no system in place where Northerners can be trained properly and play a role. They will have individuals that will be on the "lower end" and the ones on the "high end" are going to be from elsewhere because they are qualified. For example, people from Ontario and Alberta. This is a major obstacle for communities. Unions also create barriers for Northerners – for example, apprenticeship after pre-employment training is completed. There is also racism and bad experiences on mine sites towards Indigenous people.
- Carolanne noted there is an HR Development Agreement that the government also uses. Saskatchewan required surface lease agreements in the 90s, the first one likely 1993. Other jurisdictions in the country are catching to meet social commitments. Carolanne acknowledges there is a gap between surface lease agreements and the evidence, as 30 years later improvements still need to be made. Denison will begin discussions on surface lease agreements and the associated HR Development Agreements. Part of this conversation will be asking, what does those commitments look like for the new generation of uranium miners? This includes entry versus management jobs. Denison has this in mind and there are 3-4 generations of uranium miners, and this is an opportunity for Denison to draw on talent that is not always at entry level. Denison has an ability to connect with those that have come before and take a strong interest in moving beyond entry level positions to positions with more decision-making capabilities. In terms of racism on site, all sites have cultural respect policies. Racism and respect for all diversity categories is quite important to all companies. A feasibility study was completed this past year and 11/14 field program were Indigenous. Foundationally, Denison had conditions to build on to continue to emphasize the importance of diversity and respect for everyone including or Indigenous colleagues at site. It does matter.
- Shannon added that creating a safe work environment for everyone looks at truth and reconciliation. Right now, you can't speak your own language over the radio. Even with environmental monitoring technician

positions, there is no support. There is limitations in receiving training and going to site and being treated as a joke. History of being tokenized by companies. Denison should be creating something to educate contractors and consultants on truth and reconciliation, Métis people, and the value of Métis involvement. NexGen and Fission they all have great statements, but at the field level it's not working.

- Joe notes it seems like GoS is trying to achieve business first and people second. They are cutting corners. Recalls the *Saskatchewan First Act* and for Denison to understand this. Hopes that Denison can stand up for Métis. Shannon notes this should be addressed by GoS.
- Brianna notes she is not involved with this *Act* and it does not affect the *EA Act*.
- The *Act* does not encourage doing anything new but to clearly define Indigenous rights.
- This *Act* aims to establish provincial jurisdiction. So, when it comes to regulatory licensing, this is concerning. Hope that public servants can recognize this and say no to certain things as we have gone a long ways since changes were made, and studies were done for uranium mining. These can be thrown out over provincial concerns.
- Eddy Gardiner echoes Joe's sentiments and that this *Act* is concerning as it does not recognize Indigenous rights. The Duty to Consult (DTC) policy reflects it. DTC is interest based, not Rights based. In terms of Denison, NR3 is looking to do the one voice approach with NR1. NR3 is considered an impact region. Considering the agreement drafted, some locals here are not included and all should be included in these discussions, as NR3 operates as a council. These are Rights-bearing communities. Municipalities do not speak with Métis; communication is always through Métis Local, Region, or MN-S that speak with Métis people. Métis need to have more of a say and role in governance. NR3 needs to have some capacity to meet with Denison's technical team to strategize and be part of decision making and be part of the TLU.
- There is history. Il-a-la-Crosse was here before Canada was a country. The fur trade they everywhere. So if you tell us we are not part of the impact, the history tells us different. NR3 needs to look at this TLU and capacity. Denison has to leave something for the community. Métis support the project. Métis people have to be major players. When Denison mentions they need 4 approvals, they actually need 5 and it's that social licence from the people/communities. Moving in that direction, key players are always at the major decision-making tables. This includes training and careers for young people. There is a big labour pool in Northern Saskatchewan and Denison should tap into that. There are strategies around hiring immigrants with expertise – but the focus should be on the North.
- Janna thanked Eddy's comment on the social licence.
- The Métis Knowledge Study will be conducted and take 12 months. Carolanne said the agreement includes the MKS and a proposal brought to Denson by MN-S/TWC. This is a significant CFA that Denison has entered into to. Denison is really proud this was signed this because it's what MN-S had been seeking and supporting.
- There is still fear about engagement and DTC. Exploration and engineering has been done. The descriptions are confusing and Denison has proceeded far ahead of Métis, without considering these other factors that have been going on for years.
- Carolanne said in 2019, there was a fairly major change when MN-S came to Denison. Part of today and yesterday's meeting was to start the lift off and capture Métis interests in a process we've agreed to with MN-S. Noted this discussion can be continued offline with Brent/Shannon to provide more details. Sometimes it takes a while. We started in 2019/early 2022 and then a pandemic occurred.
- Louis noted NR1 and NR3 should be at the same table.

Two Worlds Consulting (TWC) Métis Knowledge Study

- Heidi Klein (TWC) reviewed the Métis Knowledge Study (MKS) to distinguish it from the other studies. It will be specific to NR1 and NR3. Hiring a coordinator to work with TWC in both regions at the same time. TWC will be doing secondary research and there are key documented records of Métis Knowledge to bring into this process, while also starting the on the ground planning with the two regions. The new primary research and interviews is currently considered for March and June, dependent on when the Community Coordinator is hired. Provided a summary on EIS report writing and the presentation in December. The purpose is to pick up on the comments for the EIS that are Métis knowledge needs to be part of it.
- The intention of this MKS is to inform the EA decision-making process. Denison is to determine the timeline for this.
- Along with TWC, MN-S has started a system of collecting and storing MK and creating story maps similar to what Shannon showed in the cultural share. There will be story map where the regions can go to this map to see hunting areas, etc. Funding has been provided and TWC is beginning this work now. This can be built upon in the years as there are other funding sources made available. This is just the starting point. MN-S will be able to add to this over time.

- MN-S is in charge in the hiring process for the Community Coordinator.

Question: Where can NR1 and NR3 be involved in the hiring process? **Answer:** Shannon said initially, MN-S had asked for two coordinators for each region. Denison provided funding for one region. A job description is being developed. MN-S are not trying to implement anything but had to put this together to get funding.

Métis Nation Saskatchewan (MN-S) Next Steps

- Next step is for NR3 and NR1 to work together. MN-S is meeting with NR1 every two weeks. Currently, MN-S is at the very beginning stages of informing regions and leadership.
- Story mapping is a methodology that was used in ER3. It's not just for mapping, it includes photos and videos and allows interaction.
- The NextGen TLU is not a living document. This will allow interaction with communities. It's about bringing communities together and displaying the information, being transparent, accountable, and looking at the VCs for Denison and building on them to meet the needs of our communities. Want to make it work for our communities. The EIS review was big and now MN-S is setting up the joint meetings to be consistent in the whole process to make it successful. Direction will always come from leadership.
- Louis notes that for the one voice approach, NR3 has to be more involved and his membership wants updates.
- Shannon said CNSC and GoS didn't get a chance to present. Today is a long process for CNSC and GoS. This is our first date and for building relationships. This will not happen during this meeting. There needs to be consistent collaboration and inclusion.
- Louis notes there is a window closing on this and MN-S needs to move quickly.
- Shannon said she is talking about the long-term relationship. Noted that Carolanne is right, while Métis weren't involved in the baseline studies, and the more we meet the more direction MN-S can get to move this forward.

Actions

MN-S:

- Shannon to set up meeting with NR1 and NR3.

5.3 Meeting Minutes Joint NR1 and NR3 Community Engagement Session, February 27, 2023

Wheeler River Project – Draft Environmental Impact Statement
Northern Region 1 (NR 1) and Northern Region 3 (NR3)
Community Engagement Session, February 27, 2023

Subject	Wheeler River Project
Prepared By	Two Worlds Consulting (TWC)
Location	Virtual: Microsoft Teams
Groups Involved	Métis Nation Saskatchewan (MN-S) TWC
Participants	Northern Region 1 (NR1): Laura Burnouf – Regional Director Lazar Lafleur, Local 19 - La Ronge Curtis Fiss, Local 80 - Stony Rapids Northern Region 3 (NR3): Elder Max Morin Mervin 'Tex' Bouvier - Regional Director Percy Kenny, Local 82 – Patuanak Joe Daigneault, Local 37 - Beauval Sipisihk Kim Burnouf, Services Director Kelvin Roy, Local 5 - Green Lake MN-S: Brent Laroque, Director of Environment Shannon Landrie-Crossland, Senior Engagement Advisor Andrew Spriggs, Lands and Consultation Officer TWC: Daryl Harrison, Technical Review Support Eliza Bethune, Technical Review Support NR1 Regrets: George Natomagan, Local 16 - Weyakwin Larry Lavallee, Local 20 - Timber Bay Allen Augier, Local 50 - Uranium City NR3 Regrets: Mike Natomagan, Local 9 - Pinehouse Lake Louis Gardiner, Local 21 - Ile-a-la-Crosse Patsy Laliberte, Local 38 - Jans Bay Eugenie Lafleur, Local 67 - Dore/Sled Lake Lisa Maurice, Local 176 Sandra Bouvier, Local 41 - Cole Bay Fred Kenny, Local 174 - Canoe River
Date/Time	February 27, 2023 (9:00 am – 3:30 pm MST)
Copies to	MN-S, TWC

Purpose of Meeting

- Provide an overview of the third-party review of Denison Mines Corp's (Denison) Wheeler River Project's (Project) Draft Environmental Impact Statement (EIS).

Discussion

Introduction:

- Shannon thanked everyone for attending the meeting and requested everyone's permission to record the meeting via Microsoft Teams to support note taking. Minister Mervin 'Tex' Bouvier did not want the recording to be accessible beyond the attendees or staff that need to reference it.
- Elder Morin led an opening prayer.
- Shannon led roundtable introductions and Elder Morin provided a culture share.
- Shannon shared that Denison declined MN-S' budget request to support a joint in-person meeting between NR1, NR3, and Denison in Saskatoon. Noted Denison suggested MN-S use money from the Métis Knowledge Study (MKS) budget to cover the meeting costs and that they would provide additional funding to MN-S at a later date. As a result, MN-S decided to proceed with a virtual meeting.

Locals' Administrative Challenges

- Minister Mervin 'Tex' Bouvier noted Locals require administrative support from MN-S. Acknowledged that some Locals do not have an office, legal support, access to a computer or cell phone, access to strong wifi, or training on virtual meeting platforms such as Zoom. Noted many NR3 Locals were not able to attend today's meeting because of these challenges.
- Brent noted that any 10 Métis can form a Local ('paper Local'). MN-S is working to close this gap to help provide capacity to established Locals.
- Minister Mervin 'Tex' Bouvier advised MN-S avoid using the term 'paper Local' and noted that these Locals vote and have influence at the Métis Legislative Assembly (MLA). Encouraged everyone to work together and not against each other.

TWC Draft EIS Technical Review Presentation

- Daryl clarified purpose of the meeting was to provide a summary of TWC's technical review of the Project EIS and take any comments or questions.
- Eliza reviewed the presentation agenda.
- Joe asked Eliza to provide a summary of the previous meeting. Eliza noted that Denison gave a Project overview presentation to NR1 and NR3 a few weekends ago. Noted Locals from both regions shared a lot of great feedback including expectations for Denison related to monitoring and engagement. She added that TWC has since updated the Technical Review Report they've prepared for MN-S, NR1, and NR3 to reflect the feedback shared during sessions.
- Eliza provided an overview of the Environmental Assessment (EA) and Environmental Impact Statement (EIS) processes for the Project (slides 1-8). Noted where the Project is in each process. Confirmed the EIS process is separate from the Impact Benefit Agreement (IBA) process.
- Joe expressed importance of knowing background of consultants conducting review as trust is a key issue moving forward. Eliza highlighted that bio's for all consultants involved are included in the TWC technical review document.
- Joes highlighted the importance of the baseline/benchmark of conditions at the mine site. Eliza identified that Denison provides baseline studies for values components in the draft EIS and that the Métis Knowledge Study will context of existing conditions for Métis. It is to occur in the future with funding from Dennison and be integrated into the final EIS. Mervin would like to get copy of the baseline studies.
- Eliza reviewed issues and resolutions identified from the third-party technical review of the Project's Draft EIS. Noted this information will be used to inform the Final EIS, the Project, and Denison's engagement with MN-S, NR1, and NR3 going forward.
- Minister Mervin 'Tex' Bouvier expressed the importance of a cultural assessment of the Project.
- Joe said Métis should be involved in setting sampling/monitoring benchmarks for the Project. Added that this involvement needs to be prior to Project approval.
- Minister Mervin 'Tex' Bouvier shared concern for Denison-led studies. Noted importance of Métis-led studies.

- Shannon confirmed that Denison will be conducting annual sampling and they will push for Métis traditional resource users to collect traditional land use data to bridge the knowledge gap.
- Minister Laura Burnouf suggested TWC continue their presentation. Stated not all communities in NR3 will be impacted by the Project.
- Minister Mervin 'Tex' Bouvier disagreed with Minister Laura Burnouf's suggestion. Noted the rivers flow throughout NR3 and expressed importance of not excluding any communities.
- Joe added that some communities will be affected by the Project's transportation route, airborne impact, impacts to lakes etc.
- Lazar said NR1 is not trying to exclude anyone. Noted the MKS should focus on NR1, but acknowledged that everyone is affected by the Project.
- Joe suggested the regions form some kind of committee similar to the EQC to protect Métis rights.
- Lazar said this the in-situ recovery (ISR) mining process is manageable. Noted the importance of educating Métis people to interpret Denison's technical data.
- Percy asked if MN-S has a legal team. Shannon confirmed that the CNSC identified all NR1 and NR3 communities to be consulted and engaged on the Project. Noted the MKS will help support IBA discussions between MN-S' legal team and Denison. She confirmed the IBA process is separate from the EIS process.
- Minister Mervin 'Tex' Bouvier emphasized the importance of training, jobs, and economic support at the community level. Added the Denison should also be providing community well-being support (e.g., mental health services).
- Lazar suggested Denison consider Northlands College for mining-specific training opportunities for Métis. Brent said MN-S was looking into this.
- Eliza reviews Draft EIS sections and Engagement issues (slides 9-12)
- Joe commented that Denison's definition of an Indigenous Community of Interest was not reflective of Métis.
- Percy expressed concern for the Project's effects to the underground water system. Concerned that the Project will have similar impacts to the environment as the Key Lake operation. Minister Mervin 'Tex' Bouvier also expressed concern for legacy impacts as a result of the Project similar to Orano's Cluff Lake Project.
- Lazar said Denison will be subject to strict water quality standards set by the CNSC. Noted the ISR mining method and freeze walls proposed for the Project will require extra reclamation work during decommissioning.
- Joe and Lazar discussed potential Indigenous-owned monitoring companies to be involved in Denison's sampling programs including CanNorth Environmental Services.
- Joe noted the importance of being able to understand and explain Project information at the Local and community levels. Noted some materials may need to be translated to Michif.
- Eliza reviews Engagement resolution (slide 13) and Métis Knowledge and Traditional Land Use issues and resolution (slides 14-15). Daryl summarizes issues and resolutions for Land and Resource use highlighting lack of Métis input and need for more Métis participation in monitoring and management planning.
- Minister Mervin 'Tex' Bouvier noted a Northwestern Study from Carrier Forest Products, that was provided to government but not to communities, that may include traditional land use information to support the Project's MKS. Brent said MN-S is working to source this report.
- Eliza reviewed Economics issues and resolutions (slides 16-17).

- Minister Mervin 'Tex' Bouvier expressed interest in Denison providing support to address effects to determinants of health in Métis communities.
- Joe suggested Denison's procurement policy include a clause that requires Denison to source business and procurement opportunities in the north, and with Métis. He asked if we could a list of businesses that may provide services to support the project could be developed.
- Discussion was had related to topics of interest covered by the IBA process. For example, Locals expressed interest in profit-sharing and ownership shares. Shannon confirmed these discussions will take place after the MKS is complete. Kelvin noted that these discussions should have happened before any work on the Project was done. Shannon and Brent acknowledge that would have been ideal, but MN-S, NR1, and NR3 now have to work within the constraints of the regulatory process for the Project. Noted the importance of using information from the MKS to inform the IBA negotiations with Denison.
- Kelvin expressed concern for the Project's waste disposal, job opportunities, and long-term reclamation of the lands. Shared concern for mines that being abandoned.
- Elder Morin shared that First Nations will get Project-related contracts if Métis are fighting. Noted Denison should have negotiated with Métis prior to conducting environmental studies. Elder Morin also shared concern for Locals' administrative constraints and Project impacts to social determinants of health. Elder Morin added that NR1 and NR3 have a lot of environmental knowledge to inform the Project.

- Minister Mervin 'Tex' Bouvier suggested MN-S file an injunction to establish a paper trail to ensure the Métis are taken care of. Brent said the concerns shared at today's meeting would be passed along to MN-S leadership and Legal counsel.
- Daryl reviewed the Quality-of-Life issues and resolutions (slides 22-21).
- Joe noted that some people in his community liked the two-week rotation schedule, but others did not. Noted it did have impacts to family life. Suggested the Project guarantee better wifi connection to support virtual calls between families as well as wellness services.
- Eliza reviewed Monitoring and effects management issues and resolution (slides 22-23) and Project Design issues and resolution (slides 24-25)
- Minister Mervin 'Tex' Bouvier said the cultural part is missing from the Draft EIS.
- Minister Mervin 'Tex' Bouvier noted the Locals lack capacity to complete their own reviews of Project documents/information.
- Joe asked if MN-S has someone to help turn Denison's documents/information into plain language to support Locals and community understanding. Shannon said they can request Denison provide plain language materials that use more visuals and present findings to community. She often reviews proponent presentations first to help ensure they are not too technical.
- Lazar said the MKS will help build the foundation to ensure the cultural part is reflected in the Final EIS. Shannon added that the MKS will use story mapping to document traditional land use information to better assess Project impacts to Métis.
- Eliza reviewed Aquatic Ecosystems issues and resolution (slides 26-27).
- Minister Mervin 'Tex' Bouvier asked about the Department of Fisheries and Oceans (DFO) data on fish in the Project study area. Lazar indicated they can request the information.
- Joe asked if Denison had completed any other monitoring outside of what is included in the Draft EIS. MN-S to ask Denison if other monitoring has occurred outside of what is included in the Draft EIS.
- Shannon said it's important that monitoring programs for the project include Métis-led data collection. Noted Métis should be involved in all of Denison's monitoring/sampling/surveying. Shannon said MN-S is working with the CNSC to ensure Métis are involved in CNSC-led monitoring programs.
- Eliza reviewed Terrestrial Ecosystems issues and resolution (slides 28-29)
- Shannon suggested Denison conduct a moose-specific study in the Final EIS. Caribou are included in the Draft EIS, but they have moved further north and not really in the Project area.
- Joe emphasized the importance of not focusing on key wildlife species but including the broader range of species used by Métis.
- Curtis confirmed Métis hunt Barren caribou. Percy inquired about the direction of groundwater flow. Denison's Draft EIS says groundwater will flow "eastward from the mining zone within the Lower Sandstone Aquifer before moving upward through the Desilicified Zone in the Athabasca Sandstone and overlying overburden deposits toward Whitefish Lake" (pg. 10-28).
- Eliza reviewed EIS Next Steps (slide 30)
- Joe said the provincial Duty to Consult policy was outdated. Shannon said MN-S provided feedback on the policy. New policy to be released in the near-future.
- Shannon confirmed Matt will meet with NR3 Locals this week to discuss IBA negotiations for the Project. Noted NR1 had this discussion with Matt already.

Actions

MN-S:

- Source the Northwestern Study from Carrier that was provided to government (not to communities) that may include traditional land use information to support the Project's MKS.
- Pass along the concerns shared at today's meeting to MN-S leadership and Legal counsel.
- Re-send a copy of TWC's presentation from today to all NR1 and NR3 Locals.
- Ask Denison if other monitoring has occurred outside of what is included in the Draft EIS.