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RE: Canadian Nuclear Association comments on the draft environmental impact statement for the proposed Wheeler River Project.

The Canadian Nuclear Association (CNA) is pleased to have the opportunity to provide comments on the draft environmental impact statement (EIS) for the proposed Wheeler River project submitted by the Denison Mines Corporation.

The CNA has approximately 100 members, representing over 76,000 Canadians employed directly or indirectly in exploring and mining uranium, generating electricity, advancing nuclear medicine, and promoting Canada's worldwide leadership in science and technology innovation. All human activities have some form of environmental impact and Canada's nuclear industry is committed to minimizing those impacts as much as possible in all aspects of our operations and as such we are supportive of the comprehensive approach outlined in the Wheeler River EIS.

Nuclear energy is a safe, reliable, non-emitting source of energy that not only helps Canada and indeed, the world meet its electricity needs but it is also a critical element in the world's fight against climate change. It is increasingly acknowledged that without a significant increase in the use of nuclear energy the world cannot meet the Paris agreement targets. Uranium mining is the first step in the nuclear fuel cycle and not only is Canada blessed with an abundance of uranium, we have decades of experience safely mining and processing uranium. Presently, the annual global uranium supply is less than global demand and the Phoenix deposit has the ability to power millions of homes and businesses with carbon free energy for decades.

The Wheeler River Project is a proposed In Situ Recovery (ISR) uranium mine and processing plant located in the Athabasca Basin region of northern Saskatchewan. The project falls within the boundaries of Treaty 10 in the Nuhtsiye-kwi Benéné (Ancestral lands) of the English River First Nation, in the land and occupancy area of the Kineepik Métis Local #9, in the homeland of the Métis, and within Nuhenéné.

For this project the federal and provincial environmental assessment processes will be conducted in parallel, and the draft EIS has been prepared to meet the requirements outlined in both the government of Saskatchewan Environmental Assessment Act and the Canadian Environmental Assessment Act. To ensure a thorough and comprehensive EA, Denison Mines put together a very comprehensive project team comprised of individuals with extensive experience in the Canadian uranium mining industry with specific expertise in exploration, development, licensing, environmental

management, operations and decommissioning. To support this team, Denison Mines contract several companies with additional technical knowledge including:

- Ecometrix – world class expertise in hydrogeology, geochemistry, ecological risk assessment, and accidents and malfunctions
- Environmental Dynamics Inc. - recognized as experts in biological studies including the development of wildlife management plans, environmental assessments, and cumulative effects assessments,
- Independent Environmental Consultants - proven expertise in air quality and meteorological assessments across Canada and Globally,
- InterGroup – expert technical services related to socio-economic impact assessment and public engagement and the incorporation of Indigenous and Traditional Knowledge within the assessment framework.

As part of the EIS, Denison undertook a systematic assessment of alternative means to implement project components and activities. These preferred activities ultimately became the basis from which project related effects were evaluated. As an example, five mining methods were evaluated and ultimately the ISR method was selected because the alternative assessment results showed ISR had advantages over the other methods including fewer environmental effects, lower cost, fewer technical risks, fewer safety risks for workers and positive feedback from interested parties.

CNA believes it is important that innovative solutions to ensure sustainable resource development within Canada is fostered within a robust regulatory regime. The ISR method proposed by Denison is supported by many years of international experience. In fact, over half the world's uranium supply is provided through ISR mining. The ISR methodology minimizes land disturbance requirements creating no long-term waste rock piles, tailings management areas or open pits thus allowing a more rapid remediation and return of the land to natural conditions. Through field testing and modelling, Denison has demonstrated that this low environmental impact technology can be safely deployed in the high-grade uranium deposits in Canada's Athabasca Basin.

Canada is blessed with an abundance of fresh water and the use of fresh water is an important consideration in any project. Water management for the project involves the distribution of freshwater, collection of runoff water, recycling and treatment of process water and the collection and treatment of industrial and domestic wastewater. Denison plans to recycle process water to the greatest extent possible, thereby reducing the demand for fresh water supply and reducing the volume of treated effluent released.

All activities produce waste and like all members of Canada's nuclear industry, Denison is committed to minimizing and carefully managing the waste that is produced. Denison is committed to stringent waste management and containment throughout the life of the project including physical, radiological, and chemical characterization to maintain accurate waste inventories and determine

how wastes will be dispositioned either through re-use, recycling, temporary storage, or permanent disposal (on or off site).

Canada's nuclear industry is a cradle to grave industry and decommissioning and monitoring is an important element of any nuclear project. The draft EIS includes preliminary information on monitoring and follow-up programs that will be further developed as project designs are finalized. Input from regulatory agencies, the public and Indigenous peoples will be considered in the final program designs.

Like all CNA members, Denison Mines is committed to the principle of reconciliation. In 2021 Denison's Board approved an Indigenous Peoples Policy, which outlines its commitments in a number of areas, including the environment and engagement. Denison is committed to conducting meaningful engagement and relationship development with Indigenous communities and organizations a throughout the life of the project. CNA notes that various participation and funding agreements have been reached to provide capacity for Indigenous communities to actively participate in the environmental assessment process, including providing advanced review on various elements of the EIS prior to the draft being finalized and submitted to the regulators.

Denison has also conducted a comprehensive engagement process with the public including non-Indigenous Communities of Interest which are located along the existing infrastructure used by the project and nearby land users such as commercial trappers or fishers, cabin/lease owners or commercially operated lodges in the vicinity of the project. Engagement activities with these parties included information sharing, in-person and virtual meetings, workshops and site visits and provided interested parties an opportunity to be meaningfully informed about the Project to share their feedback with Denison.

The CNA reviewed the EIS executive summary and feel confident, based on the comprehensive engagement efforts that Denison has conducted, as well as the outstanding technical teams Denison put together both internally and with outside experts. The CNA supports Denison's conclusion that the project can be constructed, operated, and decommissioned in a manner where effects to the biophysical and human environments are not anticipated to be significant.

Thank you for the opportunity to provide our input. If you have questions or require further information, please contact Steve Coupland at scoupland.sgcresearch@gmail.com

Sincerely,

Signature Redacted

Jill Baker
Vice President, Operations
Canadian Nuclear Association

