



Kineepik Response to the Denison Wheeler River Project Environmental Impact Statement

Submitted by Kineepik Metis Local #9 and the Northern Village of Pinehouse



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Glossary

Prevention Planning Meetings – These Monday morning meetings are a weekly community check up. Each community organization is expected to come and share what is they are experiencing and to contribute to any community issues. What is currently occurring in the community and what if any are mitigation measures could the collective community resources provide to manage those situations.

Collateral Effect – The colonial response and subsequent effect on an Indigenous community as Industry develops operation on historical traditional territories. The community is required to adjust the current culture to respond to the needs of industrial culture. For KML and NVP people this has occurred several times in our shared history. The first during the fur trade, the second during the Natural Resources Transfer Agreement process, the third when Commercial Fishing came into the community, the fourth, when the Northern Administrative District Act came into force. The most recent came when the Uranium mining and Forest industries came into our territory. Each of these events created significant changes in the culture of the community with no consideration for the effect or any meaningful support to adjust to the change for the people of KML and NVP. The Indigenous community has no recourse to prevent the effect.

Cumulative Effects - The term “cumulative effects” generally refers to the combined effects from past, present, and reasonably foreseeable future activities, and natural processes. Specific definitions vary among different parties and under different legislation and policies, but the term generally refers to effects that may be individually minor, but collectively significant. Effects can be adverse (e.g., decreased water quality in a regional river) or positive (e.g., socioeconomic benefits like jobs and business for a local community).

Kineepik considers the entire cumulative effect of Industry which currently include forestry, mineral exploration, and mining operations. The effect on our community as this continues to grow in our traditional territories. This effect is exacerbated by historical relationships where Kineepik land users are largely excluded for the economy of this Industry.

Community Engagement Sessions – KML Metis Local host a variety of community engagement sessions. The longest running community engagement session is the Monday Morning Prevention Planning Meetings, hosted each Monday morning at 9:30 a.m. This is followed by the Reclaiming Our Community Meeting which are hosted the first Thursday of each month. Additionally, we host two large community gatherings to highlight progress and the state of the community. For Duty to Consult we host specific proponent community meeting sessions where we meet to discuss projects to determine impacts these projects will have on our section Indigenous rights.

Duty to Consult and Accommodate – The legal requirement for governments of Canada and provinces to meaningfully consult with rights bearing Indigenous people for project occurring on

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their traditional territories. When there are proven impacts from the projects than accommodation must be negotiated.

End of Line Community – Pinehouse has no other communities by road beyond the road and this means anyone traveling this road is specifically coming to Pinehouse or travelling through to the mining operations.

Indigenous Economic Leakage – The lack of capacity within Indigenous communities like Pinehouse prior to massive development projects like uranium mining operations. No ability in existing community development to capitalize on industrial activity in their areas because of historic colonization and racism. Limited businesses, stores, materials and infrastructure within community to support and build upon.

Indigenous Centre of Excellence – An institution to develop a legacy of information developed in partnership between uranium mining and exploration companies with the Indigenous right bearing community of Kineepik, to be located in Pinehouse to create Indigenous centric knowledge to better understand and accommodate the significant impacts created by the entirety of the mining activity within the region.

Land User Consultation – These are data gathering meeting hosted for community land users actively engaged in harvesting and collected resources from the KML Traditional Territory.

Lixiviant - A liquid medium used to selectively extract (or leach) uranium from ore bodies where they are normally found underground (in other words, in situ). This liquid medium, which typically contains an oxidant such as oxygen and/or hydrogen peroxide mixed with sodium carbonate or carbon dioxide, is injected through wells into the ore body in a confined aquifer to dissolve the uranium. The resulting solution is then pumped via other wells to the surface, where the uranium is recovered from it in a concentrated form for processing.

Loss of Use – KML and NVP land users cannot practice traditional activities in the areas around the mines with the growing number of operations and projects that are cumulating in a dense formation in a large area. The area now is several thousand square kilometers. This area now included the transportation routes including roads and air travel routes. This causes our community to adjust our land use activities and stay away or severely limit ourselves from area and therefore we have no access to the area for these activities.

Métis Nation–Saskatchewan (MN-S) - represents the province's Métis citizens. The Métis Nation Legislative Assembly is the governing authority of the Métis Nation–Saskatchewan (MN-S) and has the authority to enact legislation, regulation, rules and resolutions governing the affairs and conduct of the Métis in Saskatchewan.

Own Source Revenue and Resources – the use of our own revenue and resources to protect our identity and an Indigenous community. To continue to have an Indigenous language and culture



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means we must create revenue to support these societal needs, which are not been being supported to a material need by the province or country.

Reclaiming Our Community Monthly Meeting- (ROC) This meeting is hosted on the first Thursday of each month and is a multiuse meeting where we provide summary of the weekly meeting, plan significant community events and at times provide training for the ROC membership, which is open to the public, but any community organization has a mandatory membership and role. This is where long term community strategies are created.

Traditional Territory – KML traditional territory is the geographic area that we identified in a methodical collection of information from our community land users and families. The land we and/or our ancestors traditionally occupied and used. We have yet to fully complete this process and are working with our community elders on this ongoing process.

Triggered Response Capacity - This is the respond required by the Indigenous people of KML to meet the need of industry. The community is required to change focus away from Indigenous community needs to focus on the needs of Industry. This includes time to respond to the industrial education, safety protocols, regulatory responses. The need as a community to participate in the Duty to Consult on exploration requests, feasibility studies, Environmental impact studies, negotiate agreements, industry training requirements. All of this removes the community ability for practicing Indigenous cultural activities, less time of Cree language retention. This response increases as the Collateral Effect increases.

Usufructuary Rights - The concept of 'usufructuary right in land", or the right to use property belonging to another, has been used repeatedly by the Supreme Court of Canada to explain how Aboriginal title can remain unextinguished and alive under the weight of Crown sovereignty.



Primary Concerns from Document

- 1) A need for funding for education and training to reach a standard of knowledge in mining, science and math required to understand the impacts of uranium mining industry that is expected for an Indigenous community to be able to make free and prior informed decision on impact and expectation of that industry.
- 2) Development of a centre of Excellence in Pinehouse to organically develop the knowledge transference required for Indigenous community to understand the uranium mining industry including regulations, materials used, transportation, end use of products, education required mitigation efforts etc.
- 3) Support for training and education to support KML and Pinehouse on uses of artificial intelligence in the mining projects and to what level this activity can be managed by and in the community. A strategy to build capacity for matriculation graduates with the following classes English 30A 30B Chemistry 30, Physics 30, Math 30.
- 4) Begin training and education support for community to prepare for employment at the mining operations with a focus on females, youth, and previously marginalized land users. Effort to increase employment in trades and drilling related work.
- 5) Immediate efforts to build and increase emergency response capacity with community people from KML and NVP to support capacity for road incidents.
- 6) Immediate efforts to build capacity in a regional waste management operation within or near the community. To build current and future expertise in domestic waste, special waste, recycling, and the development of a transfer station in Pinehouse to support all mining activity including current operation and exploration.
- 7) Systemic increases in the use of services in Pinehouse including COOP store and PBNLP, Pinehouse Housing Corporation, Pinehouse Fishing COOP and Wild Rice, and KML Metis Local to prevent the continuation of Indigenous economic leakage.
- 8) Consideration to build industry supporting infrastructure such as warehousing, hotels, bulk fuels parts and mining necessities in Pinehouse to support community development and to stop the Indigenous economic leakage which has occurred over the last 50 years of development.
- 9) Significant improvements to the road to an industrial grade from Highway 2 to the Key Lake gatehouse to support the massive increase in heavy traffic from Industry.



KML Metis Local - Valued Ecosystem Components

1.0 Introduction

KML Metis Local #9 (KML) and Northern Village of Pinehouse (NVP) response to the Wheeler River Project Draft Environmental Impact Statement. KML has a right and responsibility to promote stewardship in their unceded and mapped traditional territory. Pinehouse is the first community south of this project and the most impacted community for Uranium mining operations in Saskatchewan in general.

1.1 Purpose of this document

KML and NVP are presenting this written statement to ensure that their constitutionally protected rights to use the land as they have always used is considered as the Wheeler River project moves through the CNSC and Saskatchewan Environmental regulatory processes for Canada and the Province of Saskatchewan. We are measuring this Environmental Impact Statement for the Denison Wheeler River project to our own community responses to the following reports: United Declaration on the Rights of Indigenous People, Truth, and Reconciliation report, The Missing and Murdered Indigenous Women and Girls.

1.2 Authorship

This document has been authored by Walter Smith a member of the Kineepik community of Pinehouse with support from KML Metis Local, Denison Mines Inc, CNSC Participant Funding and the Saskatchewan Aboriginal Relations branch. The information within is gathered from an organic community consultation program which include, weekly meetings, duty to consult public meeting, ongoing Denison consultation and CNSC regulatory monthly meetings. Additional data is also gathered from community interviews, data from the occupational and land use study and internal KML Metis Local staff and managers meetings.

1.3 Denison and Wheeler River Project

The Wheeler River Project (Wheeler River) is a proposed uranium mine and processing plant in northern Saskatchewan, Canada. It is in a relatively undisturbed area of the Boreal Forest about 4 km off Highway 914 and approximately 35 km north-northeast of the Key Lake uranium operation. This project will be hosted 6 kilometers upstream from Wheeler River and Russel Lake.

Wheeler is a joint venture project owned by Denison Mines Corp. (Denison) and JCU (Canada) Exploration Company Ltd. (JCU). Denison owns 90% of Wheeler and is the operator, while JCU owns 10%.

This project is located in KML mapped territory with the Pinehouse being the first community south of the project and the most impacted Indigenous community by this project.



1.4 Community Awareness of Climate Change

KML and NVP is aware of the global effort to reduce the processes involved in climate change. We understand that nuclear energy provides base load energy with minimal addition to the CO₂ emissions. We are actively monitoring the effects of climate change in our territory, from collecting historical data through interviews with elders and land users. We are recording changes with weather patterns, ice thickness and muskeg freezing patterns and we also recording temperature changes. We do this to keep our land user safe and aware of how these changes may affect land use activities. Currently the impact of climate change is loss of life due to changes in weather in winter earlier ice melts.

“Denison estimates that the uranium produced from Wheeler can be used to power 1 million modern homes for approximately 160 years with minimal greenhouse gas emissions. This highlights the importance of the Project at a time when reducing global greenhouse gas emissions are of the utmost importance in the battle against climate change.”

We also record world weather patterns with increase intensity of hurricanes, floods and winds in other parts of the world. We will continue to study climate change and how that effects the growing need to find resources in our territories. It is imperative that we continue to do our part in these studies and find the supports to increase this knowledge.

1.5 Water Security

Water is extremely important part of KML culture. Water is sacred and a human right for the people the of KML. On the surface we use water to travel to our homesteads to gather food and resources as we struggle to continue our way of life. We listen to world events of water shortages, and catastrophic flooding, with the most concerning that of our nearest neighbours in the United States of America. We have historically have not concerned ourselves with water quality as we did not cause any pollution. It is now necessary to monitor water quality with industry such as uranium mining in cases where uranium mining interacts with water. Most uranium contaminants occur when drilling occurs and can be dissolved in water.

“Criticism of international ISR operations largely involves the containment of mining solution and the interaction of the mining solution with groundwater. At Wheeler, in order to contain the solution within the uranium deposit and maximize recovery as well as prevent interaction of the mining solution with surrounding groundwater, Denison will create an isolated mining chamber using conventional ground freezing technology. Ground freezing will establish an impermeable barrier above and on all sides of the mining chamber, with the existing impermeable basement rock acting as a bottom barrier.”

We need to understand how water protection processes such as reverse osmosis and water treatment are used in the mining operations. KML understands that reverse osmosis removes large molecule impurities such as dissolved uranium. We also need to understand the exact molecular compound are part of the “Lixiviant” solution. We as a community need to



understand the how this chemical compound interacts with water and at what concentrations that is becomes toxic. In general, we need to increase the community western education levels so that we are able to be knowledgeable and have the capacity to protect ourselves and the environment. We collect foods and medicines from the areas being altered. If these processes are not well understood by our communities, how can we state that we are prior informed and offer consensus to the process.

1.6 Denison Engagement with Pinehouse:

Denison is currently engaging Pinehouse in what we perceive as a best practice process for community engagement. This engagement process has surpassed any previous engagement protocols we have experienced as an Indigenous community. Denison is engaging the community for this project with an exploration agreement signed in June 2022. We are currently negotiating a collaboration agreement with Pinehouse and KML. As a rights bearing Indigenous community we are recognized and treated with respect. We recognize that Denison has created an Indigenous people's policy. We are optimistic that Denison will be a great community partner on the evolution of this engagement process and working collaboratively through any concerns and issues.

2.0 KML & NVP: Social, Cultural, and Historical context

The office of KML is located within the boundaries set out by the Northern Administrative District and is further supported by the Metis Nation of Saskatchewan. KML is responsible for all proponent and industrial activity that occur on our traditional territory.

The municipality of the Northern Village of Pinehouse is approximately 114 km north by northwest of La Ronge and are accessed from secondary grid roads from Highway 165N to 914 N and is currently an end of the line community.

The municipality of Pinehouse consists of ~11 km², currently the KML Metis Local Traditional mapped territory consists of ~11,000 km².

We are developing the concepts and the capacity to collect our cultural and heritage information, which will evolve over time to capture our full history for the land use territory. Due to historical colonised practiced including the Natural Resource Transfer Act (NRTA) and the Northern Administrative District ACT (NAD) the Indigenous people of KML unceded lands are not recognized as land entitlement. KML land users have practiced governance on these lands since time immemorial and through usufructuary rights do claim this territory as our own. We are currently engaged in land claim process which includes the land at Wheeler River project. This land claim process is managed through the Metis Nation of Saskatchewan (MNS).

2.1 Indigenous Traditional Knowledge and Land Users

KML peoples are considered Woodland Cree, Woodland Dene, and Woodland Metis, although historical documents indicate that members of KML came from a diverse range of Metis, First



Nations, and other backgrounds. The Northern Village of Pinehouse is located within the traditional territory of Indigenous people of KML Métis Local. We have used these lands surrounding Missinippi (Churchill River) watershed for gathering food, shelter, and material supplies since time immemorial.

2.2 Language and Culture Restitution

Being the proven most impacted Indigenous community south of the Uranium mining operations, projects, and activities. We hunt and gather resources in all our areas for food, cultural, language and identity purposes. We have worked with and for the uranium mining industry for over 50 years, formalizing our partnership with Cameco Corporation (Cameco) and Orano Canada in 2012 with a collaboration agreement (CA).

As we review our lived experience over the past 50 years, we have determined a significant change in our behaviour from our interaction with industry. An evolution of change for which we have no recourse. We must conform to western education norms while making attempts to preserve our cultural identity and language. This reality has proven difficult as the wave of western expansion and colonisation grows. We struggle to verbalize this reality for the policies and systems are designed by western education systems. These policies are meant to support western systems and are represented in the English language.

As more understanding of our rights as an Indigenous people evolve, our ability to support more culture and language activities manifested into a more Indigenous community focused strategy. Our community members are demanding restitution of the collective colonization practices that are decimating our cultural practices and language capacity. We are starting to define the process that is responsible for the current extinction events of our Indigenous culture and languages. KML attributes this cultural and language extinction event from the effects of industry development supported by government colonization and institutional racism.

This racism and colonization create privileges for governments, industry, and education institutions, which cause marginalization and harms the health and wellness to the existing Indigenous culture and language of Kineepik people. We now know that the extinction momentum of our language and cultural is rooted in the current and historical privilege stemming from the laws and policies of agencies that govern our territory. We wonder as a people how Pinehouse would have benefitted, if we were a western community over the same 50 year period of industry.

Should one review the loss of language and the magnitude of that loss from the advent of the Uranium Industry. Prior to the industry development, Pinehouse was among the most fluent speaking communities in northern Saskatchewan. All children in Pinehouse spoke Cree with limited English and French capacity. Since the collateral effect of industry became the prominent community discourse the support for Cree language was diminished and marginalized by industry as English is the primary language used by industry. There are no children that can



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speak the Cree language fluently under the age of 35 in our community. We attribute this reality explicitly to the industry and the policies that are in place. We are not to speak our language on the mining operations and that the language of the mining operations is English. This is further exacerbated by the regulators who only recognize English and French for official languages of Canada. Creating regulatory writing document in Cree using roman orthography is more of a novelty when you consider levels of education does not allow for those documents to be read by the majority of fluent speaking members.

Over the 50 years we were told that safety and respect to the industry accepted language trumped our needs to converse in our first language on the mining operations. When one considers that the Cree language is the first language of the land where these mining operation occur, we must question the integrity or the respect of these policies. There are superficial attempts by industry to create some changes recently but no concerted effort to show respect of the culture and language of the mining operations and on the lands in which they operate.

We question whether global Environment Social Governance (ESG) principles or are being followed. One truth is the UNDRIP principles are not being respected by either the mining operations or the regulators. We know that there are no regulators or senior mining managers or executives that have a capacity to speak the Cree language to a level that where they could hold a conversation in fluent Cree with community elders. We also question the Resident of Saskatchewan North (RSN) personnel how many of those individuals are currently filled by fluent speakers of the language. When you consider this transference has occurred over 50 years one can clearly see that the transference is limited to western culture and language and only in English.

These western laws and policies and their effect on Indigenous people are well defined within the TRC and MMIWG inquiries. Currently United Nations conversations are moving towards recognizing that these past practices must be changed if true reconciliation is to occur. The UNDRIP principles are now recognizing the importance of diversity and human rights. Our own self reflection and community conversations are evolving to include these changes as we strive to regain what was lost. We must now demand efforts of western society, industry to support language and culture for this is the only path forward for healthier Indigenous communities. We expect this will lead to more sustainable yet culturally intact Indigenous models that will evolve organically over time.

KML and NVP strategy is activity determining how to stop the current language extinction process with strategies around creating more resources for culture and language. KML is leading the process for recovering from this loss. We are using our own source revenue and resources to bring pride in the language and culture for community members of KML. We will continue to bring this attention to all proponent activities that occur on the KML territory for we are all responsible to remove the effects of colonisation and institutional racism.



This loss of language causes the loss of cultural understanding – as we lose our language, we lose our connection to the land. We lose our ability to communicate with our elders, our knowledge keepers. This manifest is a severe loss of cultural transference between our youth and knowledge keepers. The known and current effects of this degradation are health and wellness issues of Indigenous populations, which increase costs to the healthcare and justice.

Once the connection to the land is lost, then the spirit of Indigenous conservation and concern for how the ecosystems as they are defined by our elders is also lost. This is the very nature of diversity; we the Indigenous peoples have known, for the land since time immemorial. The connection is irreplaceable, authentic, and inherent. By having opportunities to immerse and transmit and transfer the language to our young people, we can stop the current extinction process and to begin the revitalization our languages and cultural practices and the pride required for a healthy community.

2.3 Collateral Effect - We have experienced a sharp decline in Cree language and indigenous cultural capacity as we continue to engage with Industry. We have coined this Collateral Effect, where we experience pressure from western culture to conform or suffer lack of opportunity at the industrial operations on our lands. Collateral Effect is compounded by a lack of support for culturally sensitive training for senior managers and regulators and within the populations in our community. We have been and are still pressured to limit Cree Language use at the mining operations. There is no reciprocal pressure to external employees to learn the culture or begin to understand the language, which only exist here in our territory.

When our community members arrive at current mining operations there is no recognition of the Indigenous lands that they are on. There is no programming for current staff to engage in the language of the land. There is extreme pressure to conform to the needs of industry and to increase employee capacity in western education process. This is transferred to the communities as they react to this pressure by increasing their children's capacity in western education. This over time is severing Indigenous cultural transference. In truth the level of western education offered in the community is limited to the lowest level acceptable, so members can only benefit superficially to western processes. Our children cannot matriculate from our school systems for the programming in not offered here. Yet it is the minimum requirement for preparing to train for white collar occupations at the mining operations.

In public poles every member of our community has been impacted by industry. While our contention is not to analyse this phenomenon but to bring this truth to agencies that this change was caused by industry as it pursues profits from the resources that they are mining. We are stating loudly that the support needed to transition from our previous cultures have not been effectively supported. While we agree that some community people have transitioned into industrial expectation, one only has to review employment levels to see that this transition is still limited to blue collar employment. One would expect that after 50 years of industry, a



community with proximity to uranium development, such as Pinehouse would have greater numbers in white collar positions. We are stating that this reality will affect the safety and environmental impacts of the Denison Wheeler River project for community members of KML and Pinehouse.

2.4 Cultural Revival

We are providing opportunities to reconnect with Indigenous Identity in what we have currently coined Reclaiming Our Community (ROC) model. This model is now in its 12th year and has created significant momentum in the community. This community engagement process is evolving into a community consciousness and moving towards an organic beginnings of self governance.

We have also developed our cultural calendar, which is comprised of our current annual traditional activities. This process is awakening the system of family groups and clans and how we support each other using the resources available on our land. This process includes the seasonal changes and adjustments of cultural activities within those changes. We include the celebrations of cultural events that bring pride to our community including the Souris River, Elders gathering, Kilometer 67 gathering, Costigan Lake Fall Hunt among others.

3.0 Valued Ecosystem Components (VEC) Methodology

KML and NVP are determining what is valuable to the retention of the culture and the language as we consider the Wheeler River project. As a Indigenous people we cannot separate specific westernized concepts of environment and safety concerns for we follow a practice of the wholistic approach and follow a circular model. Everything is connected and all actions impact other actions. We are trying to manage the western paradigms and how we can integrate into our world view. We are looking for the balance between the two divergent philosophies.

Concepts of environment and ecology are animate in Cree culture, and both are alive. Water and plants, trees and even the wind are animate objects and spirits inter alia. This understanding is changing in our community, and we are losing these culturally historical concepts and are starting to practice western ways. We are aware that the loss of this ideology is bringing harm, yet we have limited recourse to prevent the occurrence. We would like to develop a blended western Indigenous model back onto our education models as these beliefs are linked to environmental protection.

3.1 Mining Methods and Education

Pinehouse understands the intention for Denison Mines to build the Wheeler River project. Our community managers are following and watching the information coming from the Pre-feasibility Study (PFS) and the Environmental Impact Statement (EIS). In reviewing the documents, we have determined that this mining project will use a new method of mining not done in the northern Saskatchewan previously. The method is known as In Situ Recovery or (ISR). The community has yet to understand the mining methods used at McArthur River and the



technology behind those methods which include raised bore. While we have some interaction with Cameco with occasional visits to the community, there is no sustained education to prepare the community for the transference required to engage in the type of education that is needed to meet the requirements of transference.

KML and NVP must be educated on all aspects of the Denison project to remove limited understanding of the processes that occurred within our traditional territories. We cannot learn how to protect the land if we can understand the math and science involved in mining and environmental protection. KML people require higher education levels because of the collateral effect, on our population caused by industry. We must understand the technological advantages being employed in the Denison Wheeler River Project. This transference of knowledge can occur through a sustained and supported education program.

As a community we need to create better understanding that these new mining methods and advanced technology if we are ever to fully participate in the economy of the future that requires the Uranium from our territory. We also need the improved education to make assurance that stated environmental policies will preform as indicated in the study and subsequent test applications. The community will also require confidence that any environmental incidents are managed in a way that is fully understood by the community.

A long term plan would be to develop and build that capacity in the community to manage the incidents and monitor any environmental cleanup processes. We must be assured that the standards being followed and that as a community, we are able to action a response to mitigate potential environmental impact. This knowledge must become an integral part of the community knowledge and capacity for this project and for uranium exploration and mining in general.

3.2 Selection of ISR mining method for high-grade Phoenix deposit

KML and NVP expect as the Wheeler River project moves through, the regulatory cycle that it will become another uranium operation. This has been our experience for the following projects in northern Saskatchewan; Uranium City Gunnar, Lorado, Rabbit Lake, Cluff Lake, Key Lake, and McArthur River. Each operation had different mining approaches and environment processes that evolved over time. Wheeler River proposes the ISR method, which we believe will be accepted by the regulators. As such this mining process will evolve and gain knowledge from incidents as others have in the past. It will become a standard for similar type deposits in our territory. We can no longer accept minimal knowledge of this mining method and others at a basic level. We need to understand implicitly with a high general community knowledge of this mining process so that we can meaningfully engage.

“The suitability of ISR mining for Phoenix has been confirmed by significant work completed in the field and laboratory – including drill hole injection, permeability, metallurgical leach, agitation, and column tests. Results demonstrate high rates of recovery in both extraction (+90%) and processing (98.5%) following a simplified flow sheet that precipitates uranium directly from



the uranium bearing solution (“UBS”) without the added costs associated with ion exchange or solvent extraction circuits.”

3.3 Environmental advantages of ISR mining at Phoenix

“The Company’s evaluation of the ISR mining method for Phoenix has also identified several significant environmental and permitting advantages, namely the absence of tailings generation, the potential for no water discharge to surface water bodies, and the potential to use the existing Provincial power grid to operate on a near zero carbon emissions basis. In addition, the use of a freeze wall, to encapsulate the ore zone and contain the mining solution used in an ISR operation, eliminates common environmental concerns associated with ISR mining and facilitates a controlled reclamation of the site. Taken together, the Phoenix operation has the potential to be one of the most environmentally friendly mining operations in the world. Owing largely to these benefits, consultation with regulatory agencies and stakeholder and *rights bearing communities*, to date, has been encouraging regarding the use of ISR mining.”

3.4 Education of In-Situ Recovery and Freeze Wall Technology

Pinehouse as a community will need to learn and understand what these new mining methods are and how they will perform. Members of the community will require a higher level of education to truly gain understanding on these new mining methods. Community will require this knowledge to have confidence in the continued success of the new mining application on our traditional territories. We will also require confidence as a community that any environmental incidents are managed in a way that is understood by the community, ideally as a service provider for environmental incidents. As an example, new terminology and materials are being considered to extract the uranium such as Lixiviant. We need to understand the component of this product. What are the potential effects to the aquifers and waters around Denison and Wheeler River?

3.5 Current KML Engagement

Our community have hosted many community meetings over the years focusing on the mining of Uranium operations since the 1970’s. Most recently we have hosted 24 public land user community information sessions since September 2021. We have gathered the historical information in the region along with current information in preparing for this preliminary document. KML is being funding for this document by Denison and received funding to host public meetings by the Saskatchewan provincial government. We are planning several more engagement sessions to continue to educate ourselves for this project.

Our need to bring a strong educational understanding will be ongoing as momentum for the Wheeler River project increases. This will cause additional community personnel to ask questions about aspects for the project. This will require trusted community process beyond proponent or regulator public postings, intermitted radio announcements, public documentation and required community visit. Community members need to hear from other community



members whom they have trust, that the systems being used to build, mine, mill and operate this project will not cause further harm to the environment and community. We as a community must understand this new knowledge and how this can integrate into our current culture. We must consider the collateral effects this will have to this generation and future generations. This is part of the development request of an Indigenous center of excellence for Uranium Mining.

3.6 Cumulative Effects of Uranium Mining to Pinehouse – Center of Excellence

This information we are collecting needs support to creation of a body of knowledge that other communities can follow. We need to create a historical collection of the variety of information collected by and given to our community. We need to develop an Indigenous centre of excellence because we are the most impacted and first community south of the uranium mining operations. We need to create, collate and make this information available for our people to reference and learn from in a method that works for an Indigenous community.

The institution in Pinehouse, can have a mandate to develop models and processes that will not harm the people of Pinehouse culturally or linguistically. Create a systemic process of building education in the schools and the community. One that can influence how the community members are to engage in the effects of industry on the community. This will also be a research and data storage centre for historical information for the uranium industry and Indigenous community in northern Saskatchewan.

4.0 Indigenous Economic Leakage

KML Metis Local and the Northern Village of Pinehouse perceptions and goals regarding the development of the Wheeler River Project and subsequent regional economic development that will arise will evolve very quickly for our community. We understand that we will not have the capacity to capture much of the economical activity and will lose substantial opportunities through Indigenous economic leakage. We will work in earnest to mitigate this leakage which is prevalent since the start of the uranium mining activity in northern Saskatchewan.

There must be a concerted efforts by Industry, governments and regulators in partnership with he community to create opportunities for community organizations and members to build businesses that can assist industry. This can be accomplished by creating an incubator program for business support for start ups to evolve capacity.

4.1 Development of the Denison Wheeler River Mine:

Notwithstanding the current western societal effects of colonization and ongoing racism against Indigenous people and the ongoing targeted distraction campaign on Pinehouse through the Freedom of Information request. There is a consensus among community members that development of this mining and milling project will benefit the community of Pinehouse. The community appreciates that Denison is materially trying to evolve the engagement process with Indigenous communities with a focus on Indigenous right bearing communities such as Pinehouse and KML.



Our community owned businesses are part of the procurement process. We have also been given capacity to be involved pre-emptively in the Environmental Engagement process. Denison personnel are in constant contact with every component of our community. Denison participated at every significant cultural activity and were materially present at those events, a process that is not lost in by community members.

4.2 Historical Treatment from Mining Operations:

Pinehouse is currently working through colonialism trauma in part caused by historical treatment from mining operation for rights bearing community members. The recent recognition of Metis as Indigenous and as Metis community with protected rights is still not completely understood by the community. Much has been lost throughout our historical connection with the uranium mining on our territory and external agency effects on our community. The ability for the community to recover and evolve as a culturally intact bicultural community with protection for our Indigenous culture and language is paramount to the community support for this project. KML cannot be complicit in the current and future protection of our language and culture. KML understands that this responsibility must be shared with agencies responsible for the degradation of the language and culture and that includes industry. There is opportunity for Denison to be an ally is critical to gaining support for this project.

4.3 Modern Technology and Artificial Intelligence:

Modern technology which includes the use of artificial intelligence will be integral to the success of this new mining method. Our community needs to build and understand what these new technological processes are. We need to fully participate in the education that will be required for this technology for this project. Beyond understanding KML could envision opportunity to work on this project site from the comforts of our community through data links to operate parts of the mill process and to monitor the mining process inter alia. We also envision an ability to provide services such as storage and warehousing services for material required at our community junction that could be transported just in time to the mining operation. These discussion items are not exhaustive but are listed as potential examples that are currently being considered by community. There is an expected dialogue for good faith communication for integrated services for Pinehouse that is constant and meaningful from Denison Mines. This would also alleviate the Indigenous economic leakage and build infrastructure for future development.

5.0 Road Safety Concerns: When determining community safety with respect to need for increased transportation for a new operation, we the Indigenous people of KML have the following concerns. We are concerned with state of the existing road from 165 to 914. The road has received upgrades up to the kilometer 75 on highway 165. From Kilometer 75 to Kilometer 112 where Highway 165 ends and Highway 914 begins there is a need for an immediate road upgrade. Highway 914 needs an upgrade in width all the way to Pinehouse to create a more



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industrialized road. We are not looking forward to the spring road conditions with just the current industry activity.

Every community member has reported near miss incidents with the increased traffic caused by the general resurgence of the Uranium Industry using semi truck and heavy hauls to transport material to the operations and project sites. We are all aware that with the increase in incidents and near misses the opportunity for a major incident is inevitable, with the current road conditions. Adding the development of a new Denison mining operation will only increase this potential for incidents for people using this road.

We (KML) travel on this road for a variety of purposes with the most significant use for land use as we hunt and gather our food. We also use the road for both goods and services which are not currently available in Pinehouse. This includes medical trips and furthering our education to meet industry requirement for opportunities. We also need to shop for large tickets items such as vehicles and land use equipment like boats snowmobiles, quads that are able to withstand the wear and tear on gravel roads.

KML community members are a very young demographic with stats Canada reporting over 70% under the age of 29. Each year we have many new inexperienced drivers using these roads for the first time. Most recently we have another 50 community people interested in obtaining licenses for vehicles. The width of the road is an issue when you are meeting with a regular sized semi truck. We are starting to meet many heavy haul trucks which take significant road width to transport materials. Road width limitations are more pronounced in the winter when the snow further limits the roads width at the road edges.

The writer has experienced routinely the need to stop or slow down to a minimal speed of around 20 kilometers to allow for the heavy hauls to pass safely. When you add the rough road conditions, visibility reduction in the winter and summer with dust and snow flurry from large vehicles. This causes unsafe conditions and increases the potential for incidents. The road must be developed to an industrial rating to allow for the increase in industrial use so that members of KML do not experience safety issues. KML is requesting that the Transport Canada, Ministry of Highways respond to the concerns of Pinehouse and inform the community of the plans for road infrastructure development. We would request the road be developed to the standard that the Key Lake and McArthur River road is managed all the way to Junction of Highway 165 and Highway 2.

There is consensus from community that further maintenance of the road from 914 that roadways including the potential for 914 extension which will not only provide assurance to Denison Mines for the Wheeler River project. Early engagement of road management and development for the highway 165 and highway 914 is required to assure the safety of the residence of KML and Pinehouse to prevent any significant incidents.



5.1 Emergency Response Services

Pinehouse will inherit significant impacts from the transportation of goods and services to the mining operations. Safety of our community member is a paramount concern for the community. We will be impacted from increased heavy haul traffic and this will impede our ability to hunt for food. We will also bear the effects of needed emergency services from our community first from the increased need for emergency response, which could dilute the limited emergency response services we currently are provided. We will also inherit any future security emergency requirement and expanded exploration and developmental impacts. We recognize that road development will offer greater opportunity for future development. This consensus does not mean that roadways developments are viewed as risk free. The expectation is that within the life of the mine the community and industry will co-develop capacity to engage in emergency response including environmental spills, traffic incidents, air traffic incidents, emergency road security, search and rescue, fire fighting, and water rescue.

5.2 Maintenance of 914 road with 914 Extension:

KML community members use the road more than any other agency including industry. As such we report to each other any incidents that we experience. We assert that the current road condition on Highway 165 and Highway 914 are not designed for the increased industry traffic and are currently eroding the current condition of the road. NVP and KML are concerned that current capacity for road maintenance from the community members of Pinehouse are not prepared for the additional maintenance requirements for the road becoming a connected road. KML and NVP request further capacity to develop road management capacity so we can provide the support necessary to manage the integrity of the road.

6.0 KML NVP Issues and Concerns:

The idea that we can work together with industry is important if we are to truly achieve reconciliation. KML and NVP work well on what we see as an imbalanced playing field. Yet we understand we must continue to work within this paradigm. We also understand that our community's support can greatly help Denison reach corporate and operational goals. With each concern we ask that Denison review our perspective and approach with solutions to either mitigate impact, find a work around, or ensure remediation or compensation. Our preference is always to ensure an impacts to the land and resources we value are either nil or minimal. Where we have proposed solutions, we want to know the role Denison can play and resources that can be allocated for KML to develop the capacity to exercise those solutions. This must be communicated thoroughly to KML and our community.

6.1 Waste Management New Development, Historical Issues

We have issues on cumulative impacts from historical legacy exploration and mining practices. Not specific to Denison, Cameco or Orano, our land users have often found remnants of past poor exploration practices which are now affecting our continued land use. The abandoned camps and industrial and domestic waste left with no known program for clean up are the most



significant of these remnants. We would like the EIS to host in partnership with provincial government regulators to host a conversation on progressive reclamation of these legacy sites.

This conversation should prioritise the community capacity and an environmental agent for process that occur on our traditional territories. This conversation could include changing the policies of waste (future waste) being brought into the NAD. Our contention is that waste that is brought into the region should be removed entirely from the region. The need for a regional waste management facility or a transfer station must be developed in partnership with KML.

6.2 Loss of Use and Access to Traditional Lands and Resources

While one project or mining operation does not materially affect our land use practices. The substantial and growing projects and mineral exploration activity severely limits our ability to practice land use for the region north of Haultain River. KML land users' limitation are now experiencing loss of use with some areas leading to complete exclusion for food sovereignty and traditional activities. As an example of this our hunting practices currently use high powered rifles to engage with big game including moose, bear, deer, and caribou in the area. With the significant and growing numbers of projects we do not know how we can continue to practice this method of food gathering in a safe method.

6.3 UNDRIP and TRC Protocols:

KML sees limited mention that this project has respected the intent of the United Nations Declaration on the Rights of Indigenous People or the Recommendations of the Truth and Reconciliation Commission. There is limited opportunity for this project to review the implications of UNDRIP and TRC and how this project will cause to effect for the Indigenous rights bearing members of Pinehouse. This is not case for other agencies providing information for this project. KML request advocacy to increase education for external agencies on the need to develop greater understanding of UNDRIP and TRC calls to actions. These agencies can be contractors, regulators, and managers within the companies. This process could be developed if the agencies co develop a centre of excellence in Pinehouse.

6.4 Co-Management, Food Sovereignty and Metis Land Access:

Other potential KML impacts is from increased development and access to our territory. Current provincial regulation of hunting, fishing, tourism, resources development and increase human traffic will affect and limit our ability to practice our protected rights. Western business with greater acumen may displace economic activity as we are still evolving our understanding of the industry business practices. KML request further study on how current provincial regulations including opportunity for co-management so lessen the impacts from this project and from increased encroachment.

6.5 Waste Management Plan:

Waste generated from the operation, construction and maintenance of mines and exploration projects need to be better understood by the community. KML is of the view that waste



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management may represent the greatest source of environmental liability arising from this project and the mining industry in northern Saskatchewan in general. KML request that planning for waste management including capacity for Pinehouse to host a waste management company and a transfer station in Pinehouse to be considered. As a community that uses this land for food, shelter and culture we want the capacity and responsibility to manage waste for this project and the industry in general and prepare for future development.

7.0 Closure

KML and NVP would like to thank the proponent Denison Mines Inc., for the opportunity to participate in the preliminary comments while creating the EIS. We look forward to working with the proponent in a respectful and constructive manner. We are extremely pleased by Denison proactive and best in class engagement practices and look forward to meeting at a mutually benefit reality for this project that exceeds all our expectation and combined efforts.



8.0 References

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9.0 Signature Page

Signature Redacted

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