



**Prince Albert Grand Council's Position on the Wheeler River Mine Project Draft
Environmental Impact Statement (EIS)**

*“This document is not meant to address and accommodate the duty to consult and it must be
addressed with the rights holders (First Nations)”*

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Introduction

The Prince Albert Grand Council (PAGC) leadership would like to thank the CNSC for arranging the review of the report on the Draft Environmental Impact Statement (EIS) for the Wheeler River Project proposed by Denison Mines.

The PAGC is a First Nations organization representing 12 treaty First Nation governments encompassing the territories of Treaties 5, 6, 8, and 10. With 28 communities, its administrative area occupies two-thirds of northern Saskatchewan. Its members include Dene, Cree, and Dakota Nations. The PAGC region is known for its diverse biophysical features, which include boreal forests and ecozones such as the boreal shield and boreal plain. It also encompasses Lake Athabasca, Black Lake, Reindeer Lake, Churchill River, and Saskatchewan River.

These diverse landforms not only create habitats for numerous plants and animals, but also support Indigenous hunting- and trapping-based livelihoods. Having lived on the lands for centuries, the Indigenous communities of the region maintain a complex relationship with the land and its resources. They actively avoid over-harvesting - a practice that is rooted in their belief in interconnected nature and society. They strongly believe that a healthy environment is the key to their survival and they want to maintain this relationship for the present and future generations.

However, these relationships are interrupted by human activities such as mining, logging, road construction and hydro corridors. Other disturbances include wildfires which are increasing in number and intensity over time. Wildfires also affect Indigenous livelihoods by clearing vast tracts of lands, and releasing toxic materials into the water and air that affect their health and food supply.

These changes have caused the decline of many species of plants and animals in the PAGC region, including the boreal and barren land caribou.

The decreasing woodland and barren land caribou populations in northern Saskatchewan are of particular concern to PAGC nations due to their cultural connections with the animals. Many communities have historically hunted caribou for food, clothing, crafts, and tools, and continue to engage in this practice to this day. However, this is now threatened by the existence of fatal chronic wasting disease and meningeal worm that may spread from southern boreal deer to woodland caribou. It is only a matter of time before these diseases are transmitted to barren land caribou and lead to further declines in deer, moose and caribou. People are also seeing increased incidences of bird flu in the regions, which affects another of their major food sources.

Overall, these changes interfere with the dynamic relationship between Indigenous peoples and nature that is entrenched in their cultural worldview. Their mixed economy does not converge with the western economic model of concentrating resources and maintaining financial institutions controlled by private entities through market integration in natural goods and services. . Rather it is a collective approach based on sharing what the land can offer ('take what you need'). They prefer to maintain land based livelihoods that support mental, spiritual and physical health and wellbeing . Changes that affect their ability to live off the land are of great concern to them, yet their questions about the quality of the water, air and wildlife often go unanswered. Indigenous communities are often the poorest in Canada and many have intergenerational trauma due to cultural genocide, impacts of residential schools and other effects of colonialism. **They experience high rates of cancer and diabetes while their mineral/resource-rich lands are**

exploited in the name of development. This is what the western economy brings for them, the first people of Canada.

In light of the above changes and their desire to maintain their livelihoods, exercise their treaty rights, and land entitlements, the PAGC leadership has carefully reviewed the above document and has prepared this submission as a response. The current response is created by PAGC review team members with expertise in the areas of traditional ecological knowledge and science as they relate to wildlife, waters, food systems and other ecosystem properties. The concerns included in this document are closely linked to the views of our Elders, knowledge keepers and land-based persons. Our PAGC team requests that the CNSC team review our submission to ensure that the concerns listed above and therein are addressed before making any final decisions on the Wheeler mining project.

We also request that the CNSC reply in writing to the General Manager Lands and Resources Secretariat Mr. Robin McLeod indicating how each of the outlined concerns will be addressed. *Please note the PAGC is an umbrella organization of their 12 Nations and is happy to provide oversight of the EIS document in particular and the Denison's Wheeler Mine in general. However, actual consultation and engagement regarding mining operations must be done with the Nations affected by the operations.* Their comments are as follows:

Overall comments:

We are thankful that the CNSC has given PAGC a chance to provide oversight on the Wheeler Mine EIS on behalf of the Nations whose territories intersect the proposed project area, especially

La Ronge, Black Lake and Hatchet Lake, SK. The team acknowledges that Denison has compiled a considerable amount of information on the mines in a comprehensive document called Draft Environmental Impact Statement (<https://www.ceaa-acee.gc.ca/050/documents/p80178/145552E.pdf>). This document takes into consideration the area's ecosystem, plants, animals and human inhabitants, and includes its cultural significance of the areas. It discusses information on Indigenous land-based activities, and existing and proposed infrastructure and construction. The document broadly reviews activities related to the in situ recovery (ISR) mining method and describes the process of acidification during uranium ore harvest. It uses mostly scientific procedures and some Indigenous knowledge to explain the management of radiation and chemical pollution in surface and underground waters and tailing ponds, as well as pollution control and mitigation and decommissioning processes. The document also highlights outcomes such as local job creation and carbon reduction through nuclear fuel supplies as economic and green energy benefits to Canada and the rest of the world. Moreover, it has provided information on the consultation and engagement processes, and on opportunities for Indigenous partnership in current and future activities including decommissioning programs. Furthermore, it describes how the mining operations would comply with section 3.1 of the Constitution Act 1982, Canadian Environmental Assessment Act 2012, provincial environmental acts and all related regulations. This information gives communities and organizations who might be affected by the Wheeler River project a chance to know more about the impact of the project on the landscape and Indigenous livelihoods.

Although comprehensive in nature, our observation indicates that the EIS falls short on several grounds. It does not properly address multiple issues related to ecosystems, human health, and the long-term sustainability of the project, particularly Indigenous concerns regarding the loss of

caribou, wolverine, and other culturally significant animals. These animals are described as threatened or endangered by the Species at Risk Act (SARA) due to the effect of human disturbances on their populations. . Furthermore, there are no details on Indigenous partnership in the economic benefit of the mines, including equity-based participation in the workforce with training opportunities for Indigenous personnel to operate in management roles. Here we further elaborate on this.

Caribou and Elders' knowledge:

The EIA ignores our Elders' understanding of the human impact on wildlife including s caribou and other species at risk, and the resulting effect on Indigenous livelihoods. Caribou is a keystone species in this region, and the mines are located in an area that is used by both barren land caribou and boreal caribou.

The EIA, like many previous documents, acknowledges that our Elders prioritize the removal or reduction of human disturbances to the landscape by blocking or deactivating access roads as a means of aiding caribou recovery (Personal experience, June 2022 meeting on SK2 East Range planning and others). The Elders also wish to avoid projects that have a significant environmental impact. Given this context, it is understandable that the already threatened boreal caribou and endangered barren land caribou will be more vulnerable if the further disturbance is encouraged in this area which currently hosts mining operations at Key Lake and McArthur River. The regions have a history of mismanaged mining operations, as shown by the 38 abandoned mines in the Athabasca region. It is believed that these regions were polluted for decades with little intervention except for some containment and recovery trials at Beaverlodge Mine. The lack of consideration

for these critical aspects of the conservation of the keystone species leads us to believe that Indigenous views are not being truly understood in the decision-making process.

In this regard, we have concerns about the efforts made by the company to properly review the available relevant reports on woodland caribou conservation, especially Mamun and Brook's report on woodland caribou traditional ecological knowledge (2017). This report includes the many changes that have occurred in caribou lands such as recent forest fires and human disturbances and the effect of predators on the caribou population. There are also concerns about the vulnerability of the northern environment to climate change, which affects the Indigenous Nations and animals and plant communities that live there. The information in Michel et al.'s 2018 report on the effect of these changes on northern Indigenous livelihoods and the health of the ecosystem would provide insight into the unique challenges of the people and the region. We believe that a thorough review of these reports would allow Wheeler Mines' EIS to better approach the mining activities in a way that conserves the caribou and preserves human health.

Application of traditional ecological knowledge:

It has become a common practice to highlight traditional ecological knowledge as a contributor to scientific findings. This EIA report is no exception. We strongly believe that Indigenous knowledge is sufficient to gather information similar to that obtained through science-based methods. Indigenous Knowledge has contributed significantly to information on the changes in caribou habitats. For example, our members have observed that woodland caribou are moving further north due to climate change and increased human disturbances in the southern boreal region. Similarly, barren land caribou are no longer coming further south as winter temperatures are not low enough to prompt their migration into southern regions. Indigenous peoples have seen woodland caribou in areas that were not utilized by caribou in the past, such as Black Lake, SK.

Unfortunately, limited use is being made of Indigenous Knowledge in delineating caribou habitats despite the data and woodland caribou traditional ecological knowledge available in the report published by Mamun and Brook (2017).

Roads/transportation, and electric corridors:

As stated in the report, the existing infrastructure in the area includes Highway 914, the provincial power line adjacent to the highway, and infrastructure for the Key Lake Operation and McArthur River Operation (Figure 1-2). The EIS further states that existing disturbances in the area are mainly from exploration activities, such as line cutting, drilling, and creating access routes. A general description of how disturbances from these activities will be managed is provided, such as a plan for the reduction of noise from transportation. However, this is far from convincing. There is little evidence that the affected areas can be restored to their former state despite the measures taken. Woodland caribou are sensitive to ecosystem changes and it is doubtful that they will return to their habitat once disturbed. Indeed, it is unlikely that the original state of the forest can be restored after the topsoil is stripped, particularly in northern regions with lower vegetation growth. This was seen in steep rock mines in Atikokan, ON where replanting efforts were unsuccessful even after treating the area with organic manures (Personal observation).

Although the use of existing roads and the construction of short roads to the highway and power lines appear to offer an appealing promise from the mining authority, the additional traffic would still be a major concern. The associated noise will always be an issue. We suggest putting speed limits of about 70 km/ hour for trucks in the boreal forest where woodland caribou reside and are used by barren land caribou in the winter.

Science-based modeling issues:

We have observed in this and many other EIA reports concerning northern Canada that mining industries rely heavily on the models to predict and understand potential risks. These include underground water modeling, GIS modeling of changes to landscape features and biophysical processes, and modeling of human exposure to radiation such as ALARA (As Low As Reasonably Achievable)¹. Although they are often helpful, excessive reliance on science-based models in an EIS report puts Indigenous people at a disadvantage. Here we provide the appropriate contexts and the proposed solutions.

Indigenous communities are not involved in the collection, analysis, and interpretation of data used by the models presented in most cases. This has become a source of suspicion when they do not see the evidence for these scientific findings at the community level. For example, the findings may state that water and air at Athabasca Basins are safe for both humans and wildlife. However, Saskatchewan is known for its comparatively increased incidence of lung cancers, and people of Indigenous heritage in the Athabasca regions constitute a large portion of cancer patients. The decline in wildlife, especially the caribou, demonstrates the limitations of these models in predicting outcomes and supporting the management of industrial activities.

Indigenous culture does not make use of models. Instead, they follow the natural changes and patterns as signals such as being fewer populations of woodland caribou or moose readily help them believe something wrong with the natural ecosystems they rely on. In this context, asking Indigenous communities for feedback on a report full of models prepared without their

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<https://www.cdc.gov/nceh/radiation/alara.html#:~:text=ALARA%20stands%20for%20%E2%80%9CAs%20low,time%2C%20distance%2C%20and%20shielding..>

involvement has limited value as our members have not been fully engaged throughout the process. This approach is somewhat disrespectful to Indigenous communities as they are not part of the development of the report and therefore do not have a complete understanding of its contents. They have every right to reject any such report including EIA or EIS. We believe that true engagement in the planning process requires a commitment from Denison to get Indigenous communities involved in each stage of the documentation and report preparation process.

One way could be arranging long-term funding for youth education in science that would prepare them for careers in biology and environmental science, which is very uncommon among Indigenous communities. Per Statistics Canada's estimation, Indigenous communities represent 5% of the Canadian population but only 0.9% of science graduates come from among Indigenous communities. Indigenous people currently make up 14% of the population of Saskatchewan and are expected to increase to 50% by 2050. Increasing their representation in science and technology, and their participation in development planning is therefore a valuable long-term goal.

Addressing Indigenous worldviews: Eco-cultural approach?

Our Elders have repeatedly stated, especially in the Caribou range planning meetings and many events with CNSC regarding mining, that they do not want to see any animals or plants disappear from the landscapes they use based on their traditional understanding of the relationship between humans and nature. When woodland caribou and other animals are lost, the cultural use of the land dies. Indigenous peoples cannot practice their treaty rights and entitlements to the lands which affect their physical and mental health, and their mixed economy connected to hunting and

gathering. And when culture dies, the conservation of ecosystem values, including biodiversity, becomes impossible.

We urge the company to understand and take an eco-cultural approach to preserve wildlife and landscape health². This will allow Indigenous communities to maintain their cultural connections with the lands to manage biodiversity and ecosystem productivity. It has been proven globally that Indigenous peoples are the best conservators of ecosystems, as they live sustainably in the most biodiverse areas in the world. Therefore, it is advisable that the industries including Denison focus on preserving the eco-cultural significance of the lands when planning mining operations and decommissioning processes.

Denison can implement programs to help Indigenous communities to maintain their ecosystem affiliations, such as encouraging the ceremonial use of lands. It can also support land-based learning programs and cultural camps where youth from Indigenous communities can learn about interconnected nature, conservation processes, and living harmoniously with nature from Elders and university researchers. PAGC currently uses these formats in our ongoing climate and fisheries monitoring programs and we would gladly provide guidance on the best practices.

Although a great deal of literature exists on the eco-cultural aspects of natural resource projects, the current EIA provides a highly science-based generalization of the complex issues surrounding the Denison operation regarding Wheeler Mine and its related management activities. We doubt the effectiveness of this approach, as the financial and other models included in the EIA highlight the economic impact and ignore social issues, including Indigenous livelihoods. For example, the

² <https://www.communityconservation.net/wp-content/uploads/2019/03/Oloriz-Presentation-May-28-2018-halifax.pdf>

impact of the mines on woodland caribou and its effects on Indigenous communities are not adequately considered or assessed.

Conclusion: Meaningful participation

Although we have discussed our concerns toward the Denison project and the limitations of the EIS, we believe that solutions can be found through proper consultation with Indigenous communities at all stages of the project including fact-finding. ‘Checkbox consultation’ no longer has a place in the era of reconciliation. We require serious consideration of the concerns raised and seek meaningful engagement on how they should be addressed. As per our knowledge, inadequate involvement of Indigenous communities has continued to be a concern in the EIA process, with minimal consideration of the issues raised by our Nations that may be affected by the proposed mining operation. Ministerial veto powers affect the process by proposing financial packages in exchange for community support. However, communities accept the financial incentive for its short-term benefits but do not consent to the mining operation and its long-term consequences. Such practice takes advantage of already vulnerable communities.

Our thoughts above highlight the loopholes in the consultation process and a lack of meaningful engagement. As per our knowledge, First Nations are unwilling to be treated as yet another stakeholder and would prefer to be a partner in the EIA process. Most Indigenous communities are now considered to be stakeholders in the same category as businesses and other public organizations, which is somewhat of a distortion of the provisions made under Section 35.1 of the Constitution Act 1982. The Act makes special reference to and affirms the existing rights of Indigenous communities, which elevates their claims over those of stakeholders such as mining companies or non-Indigenous members involved in the mining and extraction process. Our review team emphasizes active engagement in every phase whether it is assessment, management,

decommissioning or recovery programs concerning the wheeler river mine. We stress that Denison's wheeler river mines can set an example for other mining companies through activities such as providing training for Indigenous members to run mining-related businesses, or participate in environmental monitoring. For example, in addition to reducing carbon by using uranium as a nuclear power source, we recommend the inclusion of some other established green technologies such as solar panel-adapted buildings with Indigenous community partners. Currently, 33% of green energy projects in Canada are Indigenous-led and managed which demonstrates their strength in this field. We also suggest that the company consider the use of hydrogen fuels in appropriate areas if the project proceeds -based on the consent of the affected Indigenous groups. Indigenous communities can benefit economically from partnerships in all these associated projects. While the PAGC oversight team may offer recommendations, the final decisions still lie with the communities in the Athabasca region where the Wheeler River project is proposed.
