



 Denison Mines

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**PEOPLE, PARTNERSHIPS
AND PASSION**

Denison Mines Corp.

Commitments Register

Version 1

January 2024

Revision History

Version	Date	Description of Revision
1	January 2024	Submitted to CNSC and SK EAB with the Wheeler River Project revised draft EIS

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Acronyms and Abbreviations

Term	Definition
BNDN	Birch Narrows Dene Nation
CNSC	Canadian Nuclear Safety Commission
COI	Communities of Interest
Denison	Denison Mines Corp.
ERFN	English River First Nation
EA	environmental assessment
EIS	environmental impact statement
EMS	Environmental Management System
GWP&MP	Groundwater Protection and Monitoring Plan
ILRU	Indigenous Land and Resource Use
KI	Key indicator
KML	Kineepik Métis Local #9
LLRIB	Lac La Ronge Indian Band
MN-S	Métis Nation – Saskatchewan
NVP	Northern Village of Pinehouse
OLRU	Other Land and Resource Use
SK EAB	Saskatchewan Environmental Assessment Branch
PBCN	Peter Ballantyne Cree Nation
The Project	Wheeler River Project
SK MOE	Saskatchewan Ministry of Environment
VC	Valued Component
YNLR	Ya'thi Néné Lands and Resource Office

1 Executive Summary

This commitments register is a summary of the commitments made by Denison Mines Corp. (Denison) through the joint provincial-federal environmental assessment (EA) process for the Wheeler River Project (the Project). This includes commitments made:

- in the revised draft EIS,
- as part of the provincial and federal EIS review process, including comments received through the public review periods, and
- to the public and Indigenous Nations and communities through Denison's engagement process.

2 Commitments Register Details

The register captures the mitigation measures, follow-up program measures, and commitments that have been referenced in the EA documentation in a single location for completeness and traceability. The register has been designed to meet the requirements of Saskatchewan Ministry of Environment, Environmental Assessment Branch (SK EAB; 2021) and the Canadian Nuclear Safety Commission (CNSC; 2023).

Per SK EAB (2021), Denison is responsible for managing commitments made in the EIS to prevent or mitigate environmental impacts of the development and to meet specific regulatory requirements, including any terms or conditions imposed by the Minister as part of EA approval. The commitments register will be used to list and track those responsibilities and facilitate ongoing regulatory involvement. The register also includes specific commitments for monitoring. Each commitment is stated in such a manner that auditing for conformance is not subjective. Commitments must be specific, measurable, achievable and reportable. Where possible, Denison has also referred to existing guidelines or standards for evaluating whether a commitment has been met.

The Project's commitments register is an evergreen document. It will be updated, as required, following the remainder of the regulatory review process, provincial EA approval to incorporate any conditions of the approval, CNSC public hearings, and CNSC Commission decisions. For instance, in future versions of the register a column may be added to include permit numbers as these become available.

3 Consolidated List of Commitments

In this document, commitments are defined as actions committed to a regulatory body, the public or Indigenous Nations and communities by a Denison authorized representative or accepted by an authorized Denison representative. Commitments are made in written formal submissions to the CNSC, Saskatchewan Ministry of Environment (SK MOE), or other regulatory bodies, and public stakeholders.

This section provides commitments made by Denison in a series of tables.

- **Table 3.1** outlines commitments made in the EIS, including commitments made in response to FIRT IRs and provincial TRCs. This includes commitments made related to Project design features to eliminate, reduce, or control potential Project effects on the biophysical and human environments. It does not include all Project design feature that were described in the EIS that did not have a potential influence on the environment assessment and will be described as part of Project licensing and permitting.
 - Within this table, the scope of commitment was identified broadly as being either 1) a regulatory commitment (e.g., Environmental Management System [EMS], plans/procedures; follow-up program; regulatory requirement) or 2) a social responsibility commitment.
- **Table 3.2** summarizes commitments made through correspondence and documentation with the public and Indigenous Nations and communities.

The detailed commitments are shown with the wording as it appears in the source reference.

The commitments register does not list regulatory requirements that Denison is legally obligated to meet.

Table 3-1: Denison's Commitments in the revised draft EIS

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
2-1	n/a	1	The Project footprint and Project Area (i.e., the area of maximum physical disturbance) have been reduced to the extent practicable, to minimize habitat loss and alteration, as well as noise propagation.	2.8	All phases	EMS; Engineering Design	Regulatory commitment
2-2	n/a	1	Much of the proposed Project footprint will be developed within previously disturbed areas, including roads currently used for exploration activities, thereby minimizing additional habitat disturbance.	2.8	All phases	EMS; Engineering Design	Regulatory commitment
2-3	n/a	1	Restrict all construction activities to the approved Construction footprint.	2.8	Construction	EMS	Regulatory commitment
2-4	n/a	1	Site clearing and other works that involve disturbance of vegetation and/or soil will be completed during least-risk timing windows for wildlife and birds to avoid disturbance during sensitive time periods, whenever practicable.	2.8	All phases	EMS	Regulatory commitment
2-5	n/a	1	Cleared brush and soil will be stockpiled when possible, to be used in progressive reclamation.	2.8, 9.1.4.2.2	All phases	EMS	Regulatory commitment
2-6	n/a	1	Implement erosion and sediment controls during Construction, and throughout the life of the Project as required.	2.8	All phases	EMS; Engineering Design	Regulatory commitment
2-7	n/a	1	Ponds will be designed maintain a minimum freeboard of at least 1.0 m to allow for continued functioning during a probable maximum precipitation (PMP) event.	2.8	Construction	Engineering Design	Regulatory commitment
2-8	n/a	1	Processing plant exhaust from drying and packaging areas will be directed through a venturi scrubber prior to release outside of the building.	2.8	Operation	Engineering Design	Regulatory commitment
2-9	n/a	1	The height of the processing plant stack will be based on results of air dispersion modelling to be an appropriate height for optimal dispersion.	2.8	Construction	Engineering Design	Regulatory commitment
2-10	n/a	1	Various aspects of the processing plant design incorporate best practices for worker protection including grading floors towards sumps for spill collection, having appropriate ventilation rates, and monitoring systems in place to make sure these mitigation measures are meeting design specifications.	2.8	Construction; Operation	Engineering Design	Regulatory commitment
2-11	n/a	1	Bulk storage tanks for processing and water treatment will be located inside the processing plant, in a separate room from the processing equipment. The storage tanks will sit inside appropriately designed and sized concrete secondary containment basins. The secondary containment basin for each applicable chemical system will be physically separated from the containment basins for other chemical systems.	2.8	Construction	Engineering Design	Regulatory commitment
2-12	n/a	1	Ventilation in the pumphouses will be designed with the ALARA principle in mind to provide sufficient worker protection from potential radon and radon progeny exposure. Monitoring systems will be in place to make sure these mitigation measures are meeting design specifications.	2.8	Construction; Operation	EMS; Engineering Design	Regulatory commitment
2-13	n/a	1	Design liners and develop appropriate performance monitoring (e.g., leak detection, groundwater monitoring) based on the characteristics of the material being stored. Ponds or pads designed to temporarily or permanently store non-radioactive materials will be lined with a single geosynthetic composite liner system. This is a primary HDPE GM over a GCL. The GCL will include a low permeable layer of bentonite clay. Examples of Project components proposed to have this type of liner include: the industrial wastewater treatment plant precipitate pond, hazardous waste storage pad, and effluent monitoring and release ponds.	2.8	Construction; Operation	EMS; Engineering Design	Regulatory commitment

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
2-14	n/a	1	Design liners and develop appropriate performance monitoring (e.g., leak detection, groundwater monitoring) based on the characteristics of the material being stored. Ponds or pads designed to temporarily or permanently store potentially radioactive materials will be lined with a double geosynthetic composite liner system. This is a primary HDPE GM over a GCL and a secondary HDPE GM over an additional GCL. The GCL will include a low permeable layer of bentonite clay. In between the primary and secondary liners, a leak detection and collection system will also be installed. The selected design is the most robust currently known and offers a life of several hundred years with proper installation and maintenance. Examples of Project components proposed to have this type of liner include: wellfield runoff pond, process precipitate pond, landfill leachate collection ponds, process water pond, UBS holding area, and special waste pad.	2.8	Construction; Operation	EMS; Engineering Design	Regulatory commitment
2-15	n/a	1	Fuel storage and distribution infrastructure will be constructed in accordance with applicable legislation requirements.	2.8	Construction	Engineering Design	Regulatory commitment
2-16	n/a	1	Fuels will be stored in approved, above-ground, double-walled storage tank(s) equipped with secondary containment in accordance with provincial regulations and standards.	2.8	All phases	EMS; Engineering Design	Regulatory commitment
2-17	n/a	1	Stationary and mobile equipment will be fueled with a fuel-dispensing truck.	2.8	All phases	EMS	Regulatory commitment
2-18	n/a	1	A minimum 100 m distance from any waterbody will be maintained for fuel storage, refueling activities, or equipment servicing.	2.8	All phases	EMS	Regulatory commitment
2-19	n/a	1	Hazardous substances will be managed in a safe and secure manner in line with Safety Data Sheets, permit conditions, and applicable regulations. Denison will maintain an up-to-date record of the various hazardous substances on site and will maintain Safety Data Sheets and appropriate procedures for spill management, handling, and clean up in an accessible location.	2.8	All phases	EMS	Regulatory commitment
2-20	n/a	1	Clean, non-contact runoff will be diverted around Project components where possible. Contact water, including, for example, runoff from the wellfield and around the processing plant, will be collected in various ponds and eventually routed through the IWWTP for treatment prior to release to Whitefish Lake.	2.8	All phases	EMS; Engineering Design	Regulatory commitment
2-21	n/a	1	The fresh water well(s) and surface water intake will be located, designed, installed, and operated according to applicable standards and best practices to minimize effects on the groundwater and surface water environments.	2.8	Construction; Operation; Decommissioning	EMS; Engineering Design	Regulatory commitment
2-22	n/a	1	The Project will adhere to treated effluent discharge limits as stipulated in operating approvals and by regulations and for protection of aquatic life and receptors associate with the water exposure pathway.	2.8	Operation; Decommissioning	EMS	Regulatory commitment
2-23	n/a	1	Battery-powered light vehicles and mobile equipment, and an AC powered dual rotary drill for ISR wellfield development instead of a traditional diesel-powered unit will be employed where practical to reduce air emissions and noise levels and improve energy efficiency.	2.8	All phases	EMS	Social responsibility commitment
2-24	n/a	1	Project components including equipment and machinery will regularly maintained and inspected to make sure they are in good working order.	2.8	All phases	EMS	Regulatory commitment
2-25	n/a	1	Speed limits will be implemented on site roads for worker safety, to minimize generation of road dust, and to protect wildlife.	2.8	All phases	EMS	Regulatory commitment

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
2-26	n/a	1	Containment and control of mining solution and uranium bearing solution in the ground in general, and the mining area in particular, will use three layers of protection: 1. well design and operation – well will have secondary containment, be made of material resistant to mining solution, pressure grouted from the ore zone to surface, and tested for mechanical integrity prior to commissioning to confirm an adequate seal from surface to the well screen at the mining area. Operational monitoring of pressure and flow will provide assurance that the wells are functioning properly. 2. pumping – operation of the injection and recovery wells will be done in a way to maintain an inward hydraulic gradient to keep mining solutions no more than 50 m above the well screened area in the ore zone. Perimeter pumping wells will be installed vertically, horizontally, and laterally surrounding the mining area both inside and outside the freeze wall with the ability to capture fluids by pumping when required and recycle solutions should the primary containment system not perform as expected. 3. freeze wall – a freeze wall around the mining area, extending from the surface to the basement rock isolating the mining area from regional groundwater. The freeze wall is expected to be a minimum of 10 m thick, be installed 25 m away from the uranium deposit, and extend 30 m into the basement rock. Data from the groundwater monitoring network installed in and around the wellfield and freeze wall will make sure these mitigation measures are meeting design specifications.	2.8	Construction; Operation	EMS; Engineering Design	Regulatory commitment
2-27	n/a	1	Well casing integrity will be monitored in a rigorous fashion, thereby allowing Denison to respond to any steel casing failures in a timely manner. A network of monitoring wells installed within the freeze wall area will be equipped with pressure instrumentation for the determination of the vertical strain/stresses placed on the formation. This monitoring network is designed to detect if these strains may be approaching their acceptable levels prior to failure. The injection and recovery wells will also be equipped with continuous monitoring devices for pressure and temperature that can detect a breach in the well casing if one were to occur. This data will be transmitted to the processing plant for remote monitoring through a master control system. Through the master control system, operators will be capable of controlling pumphouse production lines remotely. Wellfield monitoring will facilitate detection of any issues with the injection and recovery wells. As a further preventative measure, annual mechanical integrity testing is conducted on the wells to ensure their containment and compliancy. Active monitoring will allow for operational shutdown if a scenario is approaching a failure mode	2.8	Operation	EMS; Engineering Design	Regulatory commitment
2-28	n/a	1	Double-walled (HDPE), or equivalent, piping will be used for the wellfield surface piping system and the piping will be freeze protected and secured to minimize movement. Surface pipelines will be designed to have secondary containment or catchment and have leak detection systems in place at key locations.	2.8	Construction; Operation	Engineering Design	Regulatory commitment
2-29	n/a	1	Denison is committed to conducting stringent waste characterization throughout the life of the Project. This includes physical, radiological, and chemical characterization to maintain accurate waste inventories and determine how wastes will be dispositioned through either re-use, recycling, temporary storage, or permanent disposal (on or off site). This includes clearance of material that meets unconditional release requirements and can be safely removed from site.	2.8	All phases	EMS	Regulatory commitment
2-30	n/a	1	During Operation, progressive decommissioning and reclamation activities will be completed where possible, and the progress and success of these activities will be assessed annually.	2.8, 9.3.4.2.1 9.4.4.2.1	Operation	EMS; Decommissioning Plan	Regulatory commitment

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2-31	n/a	1	At Decommissioning, areas requiring additional control (potentially the industrial landfill and IWWTP precipitate pond) will be covered with an engineered impermeable liner system to limit infiltration of precipitation into the containment system.	2.8	Decommissioning	Decommissioning Plan; Engineering Design	Regulatory commitment
2-32	n/a	1	Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The CDP outlines how radiological, physical, and chemical risks will be managed during Decommissioning so no unreasonable risks remain. Denison will prioritize passive versus active controls to reduce long-term risk. Additional decommissioning details will be provided in the PDP, which will be submitted to regulators as part of Project licensing and permitting. Prior to executing Decommissioning activities, Denison shall prepare and submit a DDP to regulators for acceptance, which builds on the preliminary decommissioning plan.	2.8	All phases	Decommissioning Plan	Regulatory commitment
4-1	n/a	1	Denison is committed to ongoing engagement throughout the entire Project lifespan.	4.7	All phases	Ongoing engagement	Social responsibility
4-2	n/a	1	With Denison's adoption of the Indigenous Peoples Policy in 2021, the commitment to take action towards advancing reconciliation with Indigenous peoples in Canada and the identified action plan focus areas of engagement, empowerment, environment, employment and education, reflect a commitment to implementation of the continuously evolving Reconciliation Action Program. Ongoing and meaningful engagement is one of the foundational action areas that Denison is committed to interweave the principles of reconciliation throughout all areas of operations.	3.3.1, 4.7	All phases	Ongoing engagement	Social responsibility
4-3	n/a	1	Engagement activities involving the General Public Interested Parties will continue after the submission of the EIS and completion of the EA process. Denison believes that there is considerable value in ongoing opportunities for discussion. Specific activities will be developed in discussion with interested public parties to ensure, among other things, potential effects continue to be minimized and Project benefits have opportunity to be maximized. Denison expects that opportunities to share information on Project status and receive information on issues and concerns will include activities that focus on communication (website, newsletters) and direct interaction (e.g., workshops, youth/elder sessions, meetings with community leadership, ongoing discussion with resource harvesters) would be reasonable initial activities to implement.	4.7	All phases	Ongoing engagement	Social responsibility
4-4	n/a	1	Regulatory engagement activities following submission of the EIS can be expected to occur to review initial EA results, respond to questions and concerns that may be identified, and identify and consider regulatory or assessment areas of interest that had not been previously defined or addressed. Engagement with regulatory agencies is expected to continue throughout the lifespan of the Project to confirm regulatory requirements are adequately fulfilled.	4.7	All phases	Ongoing engagement	Social responsibility
6-1	Air quality	1	Future measurement programs and air quality modelling for the Project will be evaluated using alternative data sets that are more recent and representative of baseline conditions in northern Saskatchewan	6.1.3.2.7	Ongoing throughout life of mine	EMS	Regulatory requirement
6-2	Air quality	1	To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial and federal ambient air quality standards, an adaptive air quality management program will be implemented. The air quality management program will contain various plans which will be finalized during permitting and licensing. The plans within the air quality management program will incorporate mitigation and monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested.	6.1.8	Ongoing throughout life of mine	EA follow-up program	Regulatory requirement
6-3	Air quality	1	Denison is committed to implementing strategies to reduce the likelihood and magnitude of the predicted Project-related effects on the Air Quality VC include emission controls and utilizing planning measures to counter the conditions that contribute to the predicted effects. Some mitigation measures have been	6.1.5	Ongoing throughout life of mine	EA follow-up program	Regulatory requirement

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
			incorporated into the Project plans and carried through the Air Quality assessment. These mitigation measures include the following: • applying water at least twice per day to unpaved roads and surfaces; • limiting equipment and vehicle speeds along the access road and site roads to <40 km/h; • equipping the dryer, calciner, and hygiene exhausts with scrubber systems; • making sure the dryer, calciner, and hygiene exhaust stacks are at least two times the building height to eliminate building downwash effects; • collecting and venting radon gas from wellfield operations (including test phases) through a radon surge tank equipped with a vertical stack at least 15 feet (4.5 m) above grade; • creating and implementing an Environmental Management System (EMS) to address air quality monitoring , including the application of water or chemical dust suppressants to control fugitive dust, in addition to other operational strategies to assist in dust control; • planning vehicle and equipment routes to minimize travel distances, where possible; and • employing standard operating procedures and completing regular inspections of equipment machinery to make sure it is in good working order.				
6-4	Noise	1	An EMS will be implemented and include noise management and monitoring plans to confirm that the Project is compliant with the federal and adopted provincial guidelines during both Construction and Operation. Noise monitoring will be similar in nature to baseline monitoring that was completed in support of this assessment and will be finalized during permitting and licensing. Noise monitoring will incorporate monitoring requirements directed by provincial and federal regulators and any received input from Indigenous groups and other Interested Parties as requested.	6.2.8	Ongoing throughout life of mine	EA follow-up program	FUP commitment
6-5	Noise	1	Denison is committed to implementing strategies to reduce the likelihood and magnitude of the predicted effects include source elimination and utilizing planning measures to counter the conditions that contributed to the predicted effects. Mitigation measures to be applied during both Construction and Operation include: • not using the concrete batching plant and crusher during nighttime hours, where possible; • locating the concrete batching operation as far away from sensitive locations as possible; • directing the generator discharge openings away from sensitive locations; • making use of available on-site obstructions to control sound exposure at sensitive areas (i.e., locate sources behind buildings); and • collecting sound level measurements from the identified sources once they are operating and determining whether the actual effect is lower than that which was modelled.	6.2.5	Ongoing throughout life of mine	EA follow-up program	Regulatory requirement
6-6	GHG / Climate Change	1	Denison is committed to reassessing the GHG and climate change components of the EIS and other elements of the SACC once more detailed, site-specific data becomes available (i.e., detailed feasibility and engineering studies). This analysis is expected to include more detailed study around overall GHG emissions, carbon sinks and mitigation options, best available technologies / best environmental practices, climate resiliency, net-zero carbon planning and offsetting.	2.5	Pre-construction/ Licensing/Permitting	EA follow-up program	Regulatory requirement
7-1	Geology (Terrain morphology and stability)	1	Injection and recovery wells will be collared at surface and surveyed regularly to monitor for any changes in the collar height over time. An associated monitoring program will be developed and will include a contingency plan whose objective would be to facilitate the timely identification of, and response(s) to,	7.5, 7.8.1, IR-66	Construction, Operation	EMS	Regulatory requirement

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			potentially emerging conditions whereby routine monitoring data indicate performance is not meeting expectations.				
7-2	Groundwater (Groundwater Quality)	1	Commitment to follow-up on ongoing hydrogeological evaluations, as well as monitoring and adaptive management	7.5	All phases	GWP&MP	Regulatory requirement
7-3	Groundwater (Groundwater Quality)	1	Implementation of a groundwater monitoring well network within and surrounding the outer perimeter of the freeze wall, and a groundwater monitoring (quantity and quality) plan	7.5	Operation, Decommissioning	GWP&MP	Regulatory requirement
7-4	Groundwater (Groundwater Quality)	1	Development of contingency plans to respond to excursions	7.5	Operation, Decommissioning, Post-Decommissioning	GWP&MP	Regulatory requirement
7-5	Groundwater (Groundwater Quality)	1	Implementation of a groundwater monitoring well network and Groundwater Protection and Monitoring Plan (GWP&MP) for surface facilities	7.5	Operation	GWP&MP	Regulatory requirement
7-6	Groundwater (Groundwater Quality)	1	Remediation of mining area during Decommissioning until appropriate COPC levels (i.e., Decommissioning objectives) are achieved in the groundwater long-term	7.5	Decommissioning	GWP&MP	Regulatory requirement
7-7	Groundwater (Groundwater Quality)	1	Implement groundwater monitoring (quantity and quality) within and exterior to the former freeze wall and along the groundwater flow path to demonstrate that groundwater conditions are aligned with those bounded by the modelling predictions, and, as such, are protective of the receiving environment	7.5	Decommissioning	GWP&MP	Regulatory requirement
7-8	Groundwater (Groundwater Quality)	1	Implement a detailed Groundwater Protection and Monitoring Plan (GWP&MP) will be provided for the Project. The GWMP will be informed by understanding of • existing groundwater conditions at the Project Area (Appendix 7-A); • the reactive transport modelling of groundwater COPCs associated with the restored mining area (Appendix 7-C); and • commitments made within the Geology and Groundwater section of the EIS.	7.8.2, Appendix 7-A, Appendix 7-C	All phases	GWP&MP	Regulatory requirement
7-9	Groundwater (Groundwater Quality)	1	The groundwater well monitoring network and sampling plan will be flexible and adapted at each stage to identify any changes in groundwater quality and quantity associated with mining activities in a timely fashion. The spatial pattern of monitoring wells (i.e., well locations and density) and the sampling schedule will reflect the spatial and temporal distribution of COPC, guided by anticipated operational conditions and by the range of constituent behaviours identified in the site-specific COPC fate and transport modelling. The monitoring system will be designed at each phase of the Project to provide adequate coverage of all hydrostratigraphic units.	7.8.2	All phases	GWP&MP	Regulatory requirement
7-10	Groundwater (Groundwater Quality)	1	Appropriate chemical and physical constituents will be monitored in groundwater, including COPCs, other major ion constituents of groundwater (e.g., total alkalinity, bicarbonate, carbonate, sodium, magnesium, potassium, calcium) and additional COPC identified in association with surface facilities: nitrogen species (i.e., ammonium, nitrate, and nitrite) and volatile organic compounds.	7.6.2.1, 7.8.2	All phases	GWP&MP	Regulatory requirement
7-11	Groundwater (Groundwater Quality)	1	Constituents to be considered as key performance indicators in groundwater are listed in the following bullets. The first three may be considered for continuous measurement. •Hydraulic response •Temperature •EC •pH •ORP •Sulphate •Uranium and Chloride	7.8.2 and IR-72	All phases	GWP&MP	Regulatory requirement

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7-12	Groundwater (Groundwater Quality)	1	Groundwater will be monitored across the [surface facilities] monitoring network and samples submitted to an accredited laboratory for analysis of the full suite of COPC or for KI parameters. Sampling frequency will be at least semi annually, and may be more frequent in wells surrounding specific facilities.	7.8.2.1	Operation	GWP&MP	Regulatory requirement
7-13	Groundwater (Groundwater Quality)	1	A groundwater monitoring network will be developed to monitor groundwater conditions upgradient, on the perimeter, and downgradient of the surface facilities. The groundwater monitoring network during Operation will focus on groundwater conditions within and on the outside perimeter of the freeze wall.	7.8.2.1, Table 7.4-7, 7.8.2.2.2	Construction; Operation	GWP&MP	Regulatory requirement
7-14	Groundwater (Groundwater Quality)	1	Shallow monitoring wells associated with decommissioned surface facilities will be abandoned in accordance with provincial well abandonment legislation.	7.8.2.1	Decommissioning	GWP&MP	Regulatory requirement
7-15	Groundwater (Groundwater Quality)	1	Retain monitoring wells upgradient, on the perimeter, and downgradient of [surface] facilities retained on site (a covered industrial landfill and covered wastewater treatment plant precipitates) to demonstrate chemical stability of groundwater surrounding and downgradient of these facilities after the covers have been placed.	7.8.2.1	Decommissioning/ Post-Decommissioning	GWP&MP	Regulatory requirement
7-16	Groundwater (Groundwater Quality)	1	The groundwater monitoring network for the Operation phase will be installed during Pre-Construction and Construction. Existing monitoring wells will be used as much as possible, but it is anticipated that several new wells will be installed to meet monitoring needs.	7.8.2.2.1	Pre-Construction/ Construction	GWP&MP	Regulatory requirement
7-17	Groundwater	1	Groundwater samples will be collected at least monthly and semi-annually in the wells within the freeze wall and on the freeze wall perimeter, respectively.	7.8.2.2.2	Operation	GWP&MP	Regulatory requirement
7-18	Groundwater	1	Sampling of water quality of the water produced in the active mining area over the entire remediation process will be frequent (at least weekly) to allow the remedial approach to be adapted as required on a spatio-temporal basis. Sampling of the wells in the upper mining area and overlying Athabasca Sandstones will be seasonally during the first three years of Decommissioning and potentially more frequent during the later two years of Decommissioning to demonstrate chemical stability.	7.8.2.2.3	Decommissioning	GWP&MP	Regulatory requirement
7-19	Groundwater	1	Remediation will continue until groundwater quality in the mining area meets acceptable levels. These acceptable levels are considered to be the 'Decommissioning objectives'	Appendix 7-C (Section 3.1.1, 4.0)	Decommissioning	GWP&MP	Regulatory requirement
7-20	Groundwater	1	Follow-up commitments related to the desilicified zone: 1. assessment of vertical hydraulic conductivity; 2. quantification of horizontal and vertical flow gradients; and 3. identification and mapping of any structures with the potential to influence groundwater flow in the DSZ, such as fractures/fault zones.	IR-73, Section 7.8.2.2.1	Pre-Construction/ Construction	GWP&MP	Regulatory requirement
7-21	Groundwater	1	Tritium concentrations in groundwater will continue to be measured as part of the routine groundwater sampling, to further evaluate the usefulness of this approach for refining the conceptual site model developed for the Wheeler River Project	IR-81, Section 7.8.2, Appendix 7-A (Appendix L and Section 4.2.2)	All Phases	GWP&MP	Regulatory requirement
7-22	Groundwater	1	Metallurgical testing and further test work will support refinement of sorptive capacity and understanding of the potential for a long-term source of COPCs (including Pb) from the remediated ore zone. Information from that test work will then be used to direct testing and monitoring during the operational phase.	IR-68	Construction and Operation	Engineering Design	Regulatory requirement
7-23	Geology (Terrain morphology and stability)	1	Further detailed geomechanical studies will be carried out to reduce the uncertainties and risks in association with the stability and deformation analyses of ore zone rock matrix and its overlying rock mass formations and assess their potential impacts on the mine operation and closure.	IR-75	Construction and Operation	Engineering Design	Regulatory requirement
8-1	Surface Water Quantity	1	It is suggested that continued hydrologic monitoring is important to provide Project phase information to monitor predictions and support effluent discharge permitting and approvals (i.e., meet approvals for continued surface water quality levels).	8.1.8	Construction, Operation, Decommissioning	EA follow-up program	Regulatory requirement

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8-2	Surface Water Quantity	1	The long-term hydrological monitoring study at the Project site has been in place since 2011. The program should remain consistent to allow for the continued establishment of long-term streamflow trends at the site through relationships to long-term operating hydrometric gauging stations in the same watershed.	8.1.8	Construction, Operation	EA follow-up program	Regulatory requirement
8-3	Surface Water Quantity	1	Monitoring should continue to include the following: • streamflow monitoring; • lake level monitoring; and • installation of stage dataloggers.	8.1.8	Construction, Operation, Decommissioning	EA follow-up program	Regulatory requirement
8-4	Surface Water Quantity	1	Monitoring stations should continue to survey at locations throughout the two main watersheds reporting to Russell Lake, identified as Watersheds A and B as outlined in Figure 8.1 4 and described in Aquatic Baseline (EIS Appendix 8-D). Hydrometric monitoring at streamflow stations should include measurement of stream discharge and water level survey and maintenance of in stream dataloggers.	8.1.8	Construction, Operation	EA follow-up program	Regulatory requirement
8-5	Surface Water Quality	1	Most of the collected contact water will be directed to the Process Water Pond and the Wellfield Runoff Pond, which will store water for use during ISR drilling (i.e., recycled). Other site runoff collection needs will be examined and identified as part of detailed design and permitting. Any excess water not required during the ISR process will be directed to the IWWTP.	8.2.4	Construction	EMS; Engineering Design	Regulatory requirement
8-6	Surface Water Quality	1	The IWWTP will be designed to treat contaminated water removed during the ISR process (e.g., backwash of sand filters, bleed solution), runoff collected from the waste pad, and other contact water, such as water from the wash bay and process sumps. The IWWTP will be located inside of the processing plant.	8.2.4	Construction	EMS; Engineering Design	Regulatory requirement
8-7	Surface Water Quality	1	Treated water from the IWWTP will be pumped to the three Effluent Monitoring and Release Ponds (each 3,300 m3). These ponds will be designed to hold effluent for 72 hours for testing before discharge to the environment.	8.2.4	Construction, Operation	EMS; Engineering Design	Regulatory requirement
8-8	Surface Water Quality	1	Treated water in the Effluent Monitoring and Release Ponds will be monitored prior to release to a surface waterbody or injected into groundwater via deep well injection. The treated effluent discharge line will be heated and have secondary containment in place.	8.2.4	Construction, Operation	EMS; Engineering Design	Regulatory requirement
8-9	Surface Water Quality	1	The exact design configuration will be optimized as required during the engineering design and permitting phase to facilitate optimal performance of the diffuser specific to site conditions.	8.2.4	Construction	EMS; Engineering Design	Regulatory requirement
8-10	Surface Water Quality; Sediment Quality and Benthic Invertebrates; Fish Health	1	To mitigate adverse effects on Surface Water Quality, Denison will implement the following mitigation measures. • Develop and implement a Surface Water Management Program that provides an integrated framework to manage water quality, including provision for water management practices for each of the primary site aspects, as well as areas of the Project site where contact water is expected. • Maximize the recycle and reuse of process water to reduce freshwater intake and release to Whitefish Lake. • Design the discharge diffuser/outfall to provide effective mixing and dilution and discharge flows that do not detrimentally affect sediments. • Develop site-specific effluent treatment to treat COPC to appropriate release limits in accordance with provincial standards and licence/permit conditions. • Discharge effluent under a scenario that will meet provincial and federal discharge criteria as identified through permitting. Scenarios may include: • discharging at a fixed rate while maintaining an appropriate minimum dilution ratio (i.e., discharge	8.2.5; 8.4.6; 8.5.5	All phases	EMS; Engineering Design	Regulatory requirement

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			when able to meet the required dilution ratio and cease discharge during periods when unable to meet the necessary dilution ratio); • discharging under a variable waste load allocation (i.e., discharge an appropriate effluent volume based on flow in the receiver to maintain minimum dilution ratio); and • managing discharge via a hybrid of these (i.e., discharge effluent at a fixed rate to maintain the required dilution ratio, but the fixed rate can be varied on a seasonal basis based on flow).				
8-11	Surface Water Quality; Sediment Quality and Benthic Invertebrates; Fish Health	1	• Collect and monitor contact water to determine whether treatment is required prior to release to the environment to inform optimal levels of treatment. • Maintain the water management system in place during decommissioning until such time that water quality is suitable to release to the environment. • Monitor and manage effluent, including contingency for effluent treatment as may be required, so that water discharge objectives are achieved as defined by applicable provincial and federal regulatory instruments. • Design and implement an Environmental Code of Practice that defines action levels and appropriate steps to be taken to mitigate elevated concentrations of chemical and radiological constituents in treated effluent discharge to acceptable levels. • Implement Project-specific monitoring programs (e.g., effluent monitoring plan, environmental monitoring plan) that include monitoring treated effluent, surface water and sediment quality, and applying adaptive management, if necessary. • Work with the associated communities to develop and implement the Project-specific monitoring programs and a framework to share the results for the purpose of assessing the performance of the water management system. • Develop and implement a decommissioning and reclamation plan to decommission and transfer the site to the province under the Institutional Control Program.	8.2.5; 8.4.6; 8.5.5	All phases	EMS; EA Follow-up Monitoring	Regulatory requirement
8-12	Surface Water Quality	1	The surface water quality monitoring and follow-up program will have the following objectives: • collecting and recording surface water quality to confirm that source and receiving water quality predictions are consistent with those presented in the EIS; and • monitoring to confirm the effluent and receiving water quality meet applicable regulation criteria.	8.2.8	All phases	EMS; EA Follow-up Monitoring	Regulatory requirement
8-13	Surface Water Quality	1	The monitoring and follow-up program will include measurement of water quality parameters to meet regulatory criteria (i.e., provincial discharge permits, Metal and Diamond Mining Effluent Regulations [MDMER; Government of Canada 2022] and CSA N288.4-19 (CSA Group 2019). At a minimum, this will include collection of non-radiological parameters (e.g., metals, nutrients, hardness, temperature, pH, TDS, TSS, and sulphate) and radiological parameters.	8.2.8	All phases	EMS; EA Follow-up Monitoring	Regulatory requirement
8-14	Surface Water Quality	1	Monitoring will occur within the collection ponds, specifically the Effluent Monitoring and Release Ponds and the receiving water (Whitefish Lake). Water quality monitoring in the natural environment will occur at the point of discharge (near-field) at LA-5 (Whitefish Lake South), at an upstream reference location (Whitefish Lake North [LA-6]) and at downstream locations (far-field locations). The far-field monitoring locations will be located in Whitefish Lake South (LA-5) prior to its discharge to McGowan Lake (LA-1). Constituent concentrations will be compared to the values used in the EIS and to applicable regulatory criteria or objectives.	8.2.8	All phases	EMS; EA Follow-up Monitoring	Regulatory requirement
8-15	Surface Water Quality	1	Specific monitoring and follow-up plans for the Surface Water Quality VC will be prepared to refine and finalize the approach and specific metrics following consultation with Indigenous groups, other	8.2.8	All phases	EA follow-up program	Regulatory requirement

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			stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC-specific program.				
8-16	Fish and Fish Habitat	1	Measures to mitigate adverse effects on the Fish and Fish Habitat VC are consistent with those to mitigate adverse effects on the Surface Water Quantity, Surface Water Quality, Sediment Quality and Benthic Invertebrates, and Fish Health VCs. These measures are repeated in this section for completeness, with additional measures added as applicable to the Fish and Fish Habitat VC. • Avoid more sensitive habitats to the extent practicable. • Maintain existing drainage patterns with the use of culverts, where applicable. • Maintain access roads by periodically re-grading and ditching to improve water flow, reduce erosion, and manage vegetation growth. • Inspect culverts periodically. Remove accumulated material and debris upstream and downstream of the culverts to prevent erosion, flooding, habitat damage, property damage, and mobilization of sediment. • Attenuate peak discharges and augment baseflows to the environment through the use of Project water storage features (i.e., runoff, process water, contact water, monitoring/effluent ponds). • Develop and implement a Surface Water Management Program that provides an integrated framework to manage water quality and includes provision for water management practices for each of the primary site aspects, as well as areas of the site where there is contact water. • Maximize the recycle and re-use of process water to reduce freshwater intake and release to Whitefish Lake.	8.3.5	Construction, Operation	EMS; Engineering Design	Regulatory requirement
8-17	Fish and Fish Habitat	1	• Design the discharge diffuser/outfall to have the smallest footprint possible while still providing effective mixing and dilution and discharge flows that do not detrimentally affect sediments. • Adhere, as applicable, to the Interim Code of Practice: End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater (DFO 2020a). • Adhere, as applicable, to the Interim Code of Practice for Temporary Cofferdams and Diversion Channels (DFO 2020b). • Adhere, as applicable, to the Interim Code of Practice for Temporary Stream Crossings (DFO 2020c). • Plan in-water works, undertakings, or activities to respect timing windows to protect fish and fish habitat, including their eggs, juveniles, spawning adults, the organisms upon which they feed, and the areas where they migrate. In-water works should be deferred based on the specific waterbody and known species that inhabit the waterbody (Saskatchewan Restricted Activity Timing Windows for the Protection of Fish and Fish Habitat [DFO 2020d]). • Spring spawning species (northern Saskatchewan) – avoid work between May 1 and July 15. • Fall spawning species (northern Saskatchewan – Lake Trout present) – avoid work between September 1 and July 15). • Fall spawning species (northern Saskatchewan – Lake Trout absent) – avoid work between October 1 and July 15). • Where possible, conduct instream work during periods of low flow (e.g., summer or winter) to further reduce risk to fish.	8.3.5	Construction, Operation, Decommissioning	EMS; Engineering Design	Regulatory requirement
8-18	Fish and Fish Habitat	1	• In discussion with responsible authorities, prepare a fish salvage plan to relocate fish prior to in-water works. • Design treated effluent discharge or freshwater intake infrastructure to prevent entrainment or impingement of fish.	8.3.5	Construction, Operation, Decommissioning	EMS; Engineering Design	Regulatory requirement

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			- Implement an erosion and sediment control plan for the site to reduce potential sedimentation of waterbodies and potential lethal affects to fish, larvae, and eggs. Ensure erosion and sedimentation measures are maintained as applicable throughout the duration of the Project. - Develop site-specific effluent treatment to treat COPC to appropriate release limits in accordance with provincial standards and licence/permit conditions. - Discharge effluent under a scenario that will meet provincial and federal discharge criteria, as identified through permitting. Scenarios may include: - discharging at a fixed rate while maintaining an appropriate minimum dilution ratio (i.e., discharge when able to meet the required dilution ratio and cease discharge during periods when unable to meet the necessary dilution ratio); - discharging under a variable waste load allocation (i.e., discharge an appropriate effluent volume based on flow in the receiver to maintain a minimum dilution ratio); and - managing discharge via a hybrid of the two previous options (i.e., discharge effluent at a fixed rate to maintain the required dilution ratio, but the fixed rate is varied on a seasonal basis based on flow). - Collect and monitor contact water to determine whether treatment is required prior to release to the environment. This will inform optimal levels of treatment.				
8-19	Fish and Fish Habitat	1	- Maintain the water management system in place during Decommissioning until such time that water quality is suitable to release to the environment. - Monitor and manage effluent, including contingency for effluent treatment as may be required, so that water discharge objectives are achieved, as defined by applicable provincial and federal regulatory instruments. - Design and implement an environmental code of practice that defines actions levels and appropriate steps to mitigate elevated concentrations of chemical and radiological constituents in treated effluent discharge to acceptable levels. - Workforce members will be transported to/from site via a fly-in/fly-out rotation and will, therefore, not use ground travel options during shift changes, which will eliminate fishing on local lakes during commutes to/from the site and during time off work. Denison site vehicles will not be available for recreational purposes. While at the Project site and off duty, workers may opt to fish local waterbodies. To protect sustainable use of resources, only catch and release of fish will be encouraged, and fish storage or cooking facilities will not be provided. - Implement Project-specific monitoring programs (e.g., effluent monitoring plan, environmental monitoring plan) that include monitoring treated effluent, surface water, and sediment quality and applying adaptive management if necessary. - Work with the associated communities to develop and implement the Project-specific monitoring programs and a framework to share the results for the purpose of assessing the performance of the water management system. - Develop and implement a decommissioning and reclamation plan to decommission and transfer the site to the Province of Saskatchewan under the Institutional Control Program.	8.3.5	Construction, Operation, Decommissioning	EMS; Engineering Design	Regulatory requirement
8-20	Fish and Fish Habitat	1	Water management infrastructure (e.g., collection pads, ponds, pumping stations), as well as various aspects of the water management and sediment control management systems, will be put into place coincident with the initiation of construction activities.	8.3.6.1	Construction	Engineering Design	Regulatory requirement

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8-21	Fish and Fish Habitat	1	Runoff associated with areas under development will be collected and either stored within management infrastructure (e.g., water management ponds) or potentially released into natural surface water features once it is safe to do so (i.e., suspended solid levels in the water would be at acceptable levels).	8.3.6.1	Construction	EMS; Engineering Design	Regulatory requirement
8-22	Fish and Fish Habitat	1	Two road crossings will be built in locations where crossings previously existed. The previous crossing were decommissioned by Cameco Corporation in 2015. The new crossing will be constructed as clear span bridges, thereby avoiding in-water works, and standard mitigations will be undertaken to minimize potential effects on Fish and Fish Habitat.	8.3.6.1	Construction	Engineering Design	Regulatory requirement
8-23	Fish and Fish Habitat	1	Treated water in the Effluent Monitoring and Release Ponds will be monitored prior to release to a surface waterbody or injection into groundwater via deep well injection. The treated effluent discharge line will be heated and have secondary containment in place.	8.3.6.1	Operation	EMS; Engineering Design	Regulatory requirement
8-24	Fish and Fish Habitat	1	The site-wide water management system will continue to operate during Decommissioning such that Denison will remain in control of site aspect affected water via the IWWTP. At that time, water (runoff) from the ISR wellfield, and contact water from the developed portion of the site (e.g., contaminated runoff pond, landfill pond, process water pond), will continue to be collected and diverted to the IWWTP. From the IWWTP, the water will be directed back to the ISR wellfield to be pumped as clean water to ground or pumped to the Effluent Monitoring and Release Ponds for monitoring prior to discharge to Whitefish Lake. Following Decommissioning, piping infrastructure will be removed and discharge to surface water will cease.	8.3.6.1	Decommissioning/Post-decommissioning	EMS; Engineering Design	Regulatory requirement
8-25	Fish and Fish Habitat	1	The fish and fish habitat monitoring program should be considered in conjunction with the surface water quantity (hydrology) (Section 8.1.8), surface water quality (Section 8.2.8), sediment quality and benthic invertebrates (Section 8.4.8), and fish health (Section 8.5.8) monitoring programs as it is specifically tied to these monitoring programs from the perspective of pathways of effects. The fish and fish habitat monitoring and follow-up program will have the following objectives: - collecting and recording surface water quality data to confirm that source and receiving water quality predictions for mobilization of solids are consistent with those presented in the EIS; - monitoring to confirm that effluent and receiving water quality meet applicable regulation criteria; - monitoring changes in fish communities/populations within the Project LSA; and - monitoring changes in physical fish habitat within the receiving environment of LA-5. Fish and fish habitat monitoring will occur in tandem with water quality, sediment quality, benthic invertebrate, and fish health sampling. Sampling locations will be co-located to facilitate comparison to water quantity, water quality, and sediment quality characteristics. Changes in fish communities/populations will be assessed through comparison of Construction, Operation, and Decommissioning results to pre-development. Fish and fish habitat monitoring will include collection of metrics associated with species presence, abundance, and life history parameters (e.g., survival, condition, growth) to meet applicable agency guidance (i.e., MDMER and CSA N288.4-19 [CSA Group 2019]). Specific monitoring and follow-up plans for the Fish and Fish Habitat VC will be prepared to refine and finalize the approach and specific metrics following consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC-specific program	8.3.8	Construction, Operation	EA follow-up program	Regulatory requirement

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8-26	Fish and Fish Habitat	1	To minimize the residual effects of the Project on the Fish and Fish Habitat VC, Denison will develop and implement a Surface Water Management Program that includes an integrated framework to manage water quality and water management practices for each of the primary site aspects and areas of the site where contact water is expected. This plan will include the collection and monitoring of contact water to determine whether treatment is required prior to release to the environment, which will inform optimal levels of treatment. This plan will also include the monitoring and management of effluent, including contingency for effluent treatment as may be required so that water discharge objectives are achieved as defined by applicable provincial and federal regulatory instruments.	8.3.8	Construction, Operation	EMS; Engineering Design	Regulatory requirement
8-27	Fish and Fish Habitat	1	Construction of the access road will involve the installation of two stream crossings. These stream crossings are located at the historical watercourse crossings along the proposed airstrip access road. These crossings will be constructed as clear-span bridges, and their mitigative design will provide for protection of the Fish and Fish Habitat VC.	8.3.8	Construction	Engineering Design	Regulatory requirement
8-28	Sediment Quality and Benthic Invertebrates	1	Monitoring and follow-up are proposed for the Sediment Quality and Benthic Invertebrates VCs to verify the accuracy of the predicted effects and effectiveness of proposed mitigation measures. The sediment quality and benthic invertebrate monitoring program should be considered in conjunction with the surface water quantity (hydrology) (Section 8.1.8) and surface water quality (Section 8.2.8) monitoring programs as sediment quality and benthic invertebrate are specifically tied to surface water quantity and quality from the perspective of pathways of effects. Specifically, monitoring of TSS in the effluent monitoring ponds and other catchment ponds prior to discharge to the environment will be important to provide context to further evaluate Project-related effects on sediment and benthic invertebrate communities in the receiving water environment (i.e., Whitefish Lake).	8.4.8	All phases	EA follow-up program	Regulatory requirement
8-29	Sediment Quality and Benthic Invertebrates	1	The sediment quality and benthic invertebrate monitoring and follow-up program will have the following objectives: - collecting and recording surface water quality to confirm that source and receiving water quality predictions for mobilization of solids are consistent with those presented in the EIS; - monitoring to confirm that effluent and receiver sediment quality meet applicable regulation criteria; and - monitoring benthic invertebrate community structure and abundance in the near-field discharge area to assess any changes that may be attributable to the Project.	8.4.9	All phases	EA follow-up program	Regulatory requirement
8-30	Sediment Quality and Benthic Invertebrates	1	The monitoring and follow-up program will include measurement of sediment quality parameters to meet regulatory criteria (i.e., provincial discharge permits, MDMER [Government of Canada 2022], and CSA N288.4-19 [CSA Group 2019]). At a minimum, this will include collection of non-radiological parameters (e.g., metals, nutrients, pH, and sulphate), radiological parameters, and physical characteristics (grain size).	8.4.9	All phases	EA follow-up program	Regulatory requirement
8-31	Sediment Quality and Benthic Invertebrates	1	Benthic invertebrate community monitoring will include the collection of samples following regulatory guidance (Government of Canada 2022) on proper collection and analysis to detect change in biota assemblages. This will include reasonable replication over a geographic area. Metrics assessed will be associated with benthic invertebrate community diversity, evenness, density, taxa richness, and similarity indices.	8.4.9	All phases	EA follow-up program	Regulatory requirement

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8-32	Sediment Quality and Benthic Invertebrates	1	Sediment and benthic invertebrate monitoring will occur in tandem and sampling locations will be co-located to facilitate comparison of benthic invertebrate community metrics with sediment quality characteristics.	8.4.9	All phases	EA follow-up program	Regulatory requirement
8-33	Sediment Quality and Benthic Invertebrates	1	Sediment and benthic invertebrate monitoring in the natural environment will occur at the point of discharge in Whitefish Lake South (near-field), at an upstream reference location (Whitefish Lake North), and at downstream locations (far-field). The far-field monitoring locations will be located in Whitefish Lake South prior to its discharge to McGowan Lake.	8.4.9	All phases	EA follow-up program	Regulatory requirement
8-34	Sediment Quality and Benthic Invertebrates	1	Constituent concentrations will be compared to the values used in the EIS and to applicable regulatory criteria or objectives.	8.4.9	All phases	EA follow-up program	Regulatory requirement
8-35	Sediment Quality and Benthic Invertebrates	1	Specific monitoring and follow-up plans for the Sediment Quality and Benthic Invertebrates VCs will be prepared to refine and finalize the approach and specific metrics following consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC-specific program.	8.4.9	All phases	EA follow-up program	Regulatory requirement
8-36	Fish Health	1	The fish health monitoring and follow-up program will have the following objectives: - collecting and recording surface water quality to confirm that source and receiving water quality predictions for mobilization of solids are consistent with those presented in the EIS; - monitoring to confirm that effluent and receiving water quality meet applicable regulation criteria; and, - monitoring changes in fish tissue concentrations of COPC that may be attributable to the Project.	8.5.8	All phases	EA follow-up program	Regulatory requirement
8-37	Fish Health	1	The monitoring and follow-up program will include measurements of fish health for comparison to baseline data and regulatory criteria (i.e., Canadian Tissue Residue Guidelines for the Protection of Wildlife Consumers of Aquatic Biota [e.g., CCME 2000], MDMER [Government of Canada 2022], CSA N288.4-19 (CSA Group 2019), and applicable United States Environmental Protection Agency criteria (e.g., US EPA 2021). At a minimum, this will include collection of representative fish species from multiple trophic levels and size classes to investigate the bioaccumulation potential of non-radiological (e.g., molybdenum, selenium, mercury, and other metals) and radiological parameters. Fish will also be assessed for their general health condition through assessment of condition and growth metrics consistent with those described in current or updated MDMER EEM technical guidance (e.g., Environment Canada 2012).	8.5.8	All phases	EA follow-up program	Regulatory requirement
8-38	Fish Health	1	Fish Health monitoring will occur in tandem with Surface Water Quality, Sediment Quality, Benthic Invertebrate and Fish and Fish Habitat sampling. Sampling locations will be co-located to facilitate comparison to water quality and sediment quality characteristics.	8.5.8	All phases	EA follow-up program	Regulatory requirement
8-39	Fish Health	1	Sediment and benthic invertebrate monitoring in the natural environment will occur at an upstream reference location (i.e., LA-6 – Whitefish Lake North), at a downstream near-field location close to the point of discharge (i.e., LA-5 – Whitefish Lake South), and at downstream far-field locations (i.e., in LA-5 – Whitefish Lake South prior to its discharge to LA-1 – McGowan Lake).	8.5.8	All phases	EA follow-up program	Regulatory requirement
8-40	Fish Health	1	The assessment will also include comparison of fish tissue COPC concentrations between a pre-mining period (i.e., before) and the Construction, Operation, and Decommissioning period (i.e., after). It is recognized that additional collection of pre-mining fish tissue concentrations in Whitefish Lake and a reference area are needed.	8.5.8	All phases	EA follow-up program	Regulatory requirement

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8-41	Fish Health	1	Specific monitoring and follow-up plans for the Fish Health VC will be prepared to refine and finalize the approach and specific metrics following consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC-specific program.	8.5.8	All phases	EA follow-up program	Regulatory requirement
8-42	Fish and Fish Habitat	1	As baseline surface water did not identify measurable concentrations of total mercury in the LSA or RSA and deposition to large water bodies such as lakes is not likely to contribute to the methyl mercury concentration in the Wheeler River receiving waters, it is most reasonable to conclude that changes in total and methyl mercury can be adequately monitored in relation to sulphate inputs. Denison will undertake monitoring of total and methyl mercury as it relates to the discharge of sulphate to Whitefish Lake.	IR-114, 8.2.4.2.3, 8.2.4.2.4	All phases	EA follow-up program	Regulatory requirement
8-43	Project Description, Surface Water Quality	1	Denison fully understands its obligations with respect to the MDMER and will comply with the MDMER end of pipe effluent discharge criteria and other requirements of the regulations.	Section 2.2.3.9 Appendix 8-E	Operation, Decommissioning/Post-decommissioning	EMS, EA follow-up program	Regulatory requirement
8-44	Fish Health	1	1. The intent is not to include mercury (and methylmercury) as a COPC for the assessment. As indicated in EIS Section 8.4.6.1, Residual Effects Characterization, mercury is not associated with the local geology and is not expected to be released in the effluent at measurable levels and was therefore not identified as a COPC. Denison notes that there is potential for increased methylmercury production in the receiving environment under a certain combination of factors to which the Project may contribute, such as increased nutrient levels in the environment; however, prediction of methylmercury production is not practical. Denison commits to monitoring mercury and methylmercury in the aquatic environment over the life of the Project to determine the potential changes in mercury concentrations in fish tissue over time. 2. As the Project advances and operational monitoring is underway, Denison will assess health risks from fish consumption by comparing fish tissue data collected during operation from the monitoring program against Health Canada's mercury guideline of 0.5 ug/g wet weight. This is a human health risk-based maximum permissible concentration. 3. Mercury data presented throughout the draft EIS represents total mercury. Denison agrees to included methylmercury as part of the constituents monitored in fish throughout all project phases.	Section 8.4.6.1, IR-100	All phases	EMS, EA follow-up program	FUP Commitment, Regulatory requirement, Social responsibility
8-45	Water Quality / Project Description	1	Denison is committed to investigating BATEA and working with the province and CNSC to ensure discharge concentrations of all constituents including uranium are protective of the aquatic environment.	IR-18	All phases	Engineering Design, EMS, EA Follow-up Program	Regulatory Requirement
8-46	Wetlands / Fish Habitat	1	To further supplement existing information that exists for the LSA wetlands, Denison is committed to undertaking wetland surveys including the collection of water quality, sediment quality, benthic invertebrates and fish and fish habitat surveys prior to the construction of the operation to provide an updated baseline for assessing the success of mitigation measures and to assess potential effects of the project on wetlands. These locations will then be further considered as part of the EMP for continued monitoring for these media and biota.	IR-101, Appendix 8-F	All Phases	Engineering Design, EMS, EA Follow-up Program	FUP Requirement

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8-47	Wetlands/Fish Habitat	1	Wherever possible, wetlands will be avoided through Project design and instituting proper buffers.	IR-101, Section 8.3.5, Appendix 8-F	All phases	Engineering Design	Regulatory Requirement
8-48	Water Quality	1	Denison is in agreement that regular water quality data collection should be instituted and commits to beginning such periodic sampling prior to construction to provide a more robust dataset and following the CCME Guidance Manual for Optimizing Water Quality Monitoring Program Design (2015).	IR-107	Prior to Construction	EA Follow-up	FUP Commitment
9-1	Ungulates, Furbearers, and Woodland Caribou	1	The goal is to reclaim the affected portions of the Project Area and establish the appropriate conditions (e.g., soil quality) to support a regeneration path that would lead to and promote a natural seral stage succession that would be compatible with adjacent habitat types (i.e., to pre-disturbance conditions in line with surrounding habitats).	TRC 182	Decommissioning	Decommissioning Plan	Regulatory commitment
9-2	Ungulates, Furbearers, and Woodland Caribou Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	The Wildlife Management Plan (for terrestrial and avian species) and the Draft Caribou Mitigation Plan (for woodland caribou) will identify all sensitive periods and habitat types and identify applicable no-disturbance setback buffers to be adhered to during all Project activities (i.e., no prioritization, applicable for all Project activities, species-specific). Generally, the nesting season for raptors, migratory breeding birds and bird species at risk spans a period from March 15 to August 31; however, the specific sensitive period for migratory birds for the C7 nesting zone (based on the ECCC nesting calendar), in which the Project is located, extends from May 3 to August 20. The calving period for woodland caribou extends from March 31 to July 31. Denning (i.e., for bears) is typically from November until early April and is weather dependent.	TRC 185	All phases	EMS	Regulatory commitment
9-3	Ungulates, Furbearers, and Woodland Caribou Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	To adequately address potential effects, regardless of the wildlife, seasonal or species-specific sensitivities, pre-disturbance wildlife clearance surveys (i.e., not species-specific surveys) will be completed prior to any work commencing. Results of the wildlife clearance surveys will be used to inform the design and delineation/establishment of suitable setback distances (i.e., specific to species, habitat, life-cycle sensitivities), work delays and/or other species-specific mitigation measures at that location, with discussions with ENV as appropriate.	TRC 185	All phases	EMS	Regulatory commitment
9-4	Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	Pre-construction surveys will be completed for pileated woodpecker nest cavities and nest cavities (if observed) will be registered in compliance with the 36-month waiting period prior to destruction of unoccupied nests (if destruction should be required) as required by the Migratory Birds Regulations, 2022.	TRC 190	All phases	EMS	Regulatory commitment
9-5	Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	Denison is committed to monitoring avian mortality related to avian use of waste and water facilities, as well as mortality events associated with interactions with access roads (particularly related to large-bodied carcasses) and transmission lines. Such mortalities will be documented and reported to the SK MOE on a basis as determined in consultation between the SK MOE and Denison.	IR-173	All phases	EMS	Regulatory commitment

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
9-6	Terrain, Soil, and Organic Matter/Peat	1	Any stockpiled mineral soil remaining during Decommissioning following progressive reclamation activities will be redistributed across the reclaimed landscape as a growing substrate to support the desired end-land use. Salvaged soil will be replaced and redistributed within areas of the Project Area to be reclaimed to provide a suitable growing substrate that is expected to support re-establishment of the desired vegetation cover.	9.1.4.2.2 9.1.6.3.1	Decommissioning	Decommissioning Plan	Regulatory commitment
9-7	Terrain, Soil, and Organic Matter/Peat	1	Where applicable and to the extent practical, peat/organic matter within the Project Area will be stripped and salvaged prior to construction.	9.1.4.2.3	Construction	EMS	Regulatory commitment
9-8	Terrain, Soil, and Organic Matter/Peat	1	To the extent practical, reclamation of the Project Area will re-instate predominant landscape features, topographical contours (slope, aspect), and surface drainage patterns in a manner that will tie-in to the existing landscape and maintain surface drainage continuity and hydrologic connectivity. Reclamation/Closure monitoring during the Post-Decommissioning Phase will be completed to verify the status and final conditions of the reclaimed landscape.	9.1.5.2.1 9.1.5.2.2 9.1.5.2.3	Post-decommissioning	EIS	Regulatory commitment
9-9	Terrain, Soil, and Organic Matter/Peat	1	A soil monitoring program/protocol (or equivalent) will verify soil salvage volumes and reclamation suitability.	9.1.5.2.2	All phases	EIS	Regulatory commitment
9-10	Terrain, Soil, and Organic Matter/Peat	1	Project features will be reclaimed during decommissioning activities to form a safe, stable, and self-sustaining landscape. However, some features (e.g., the primary access road) are expected to remain in place during the post-decommissioning phase; other features (e.g., clean waste rock pile) may be integrated into the end-landscape. The Project will be reclaimed to a safe, stable, and self-sustaining landscape. Project features will be reclaimed to a safe, stable, and self-sustaining landscape that includes re-instating topographic contours and surface drainage patterns.	9.1.6.2.1 9.1.6.3.1 9.1.6.4.1	Decommissioning	EIS	Regulatory commitment
9-11	Ungulates, Furbearers, and Woodland Caribou Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	Through progressive and final reclamation, disturbed areas within the Project Area will be revegetated with a focus on achieving the creation of a safe, stable, and self-sustaining landscape. Through progressive and final reclamation, disturbed areas within the Project Area will be revegetated with a focus on achieving baseline conditions.	9.3.6.2.1 9.3.6.3.1 9.3.6.4.1 9.4.6.2.1 9.4.6.3.1 9.4.6.4.1	All phases	EIS	Regulatory commitment
9-12	Terrain, Soil, and Organic Matter/Peat	1	Construction monitoring will be conducted during and immediately following Construction to verify that the Project is constructed to design specifications (i.e., in a manner that meets geotechnical requirements) and that mitigation measures are both appropriate and effective in relation to the level of geotechnical risk. This will provide a procedure to adapt mitigation measures (if/where necessary).	9.1.8.1	Construction	EA follow-up program	Regulatory commitment

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
9-13	Terrain, Soil, and Organic Matter/Peat	1	Construction and geotechnical monitoring will be implemented in accordance with the Environmental Management System (EMS), which will include erosion and sediment controls, soil and vegetation monitoring and the Decommissioning Plan. The timing/frequency of monitoring and reporting requirements will be determined in consultation with qualified personnel responsible for construction and geotechnical oversight (e.g., Professional Engineer). Monitoring of soil salvage activities will be implemented in accordance with other mitigation and management plans outlined within an EMS, which will include erosion and sediment controls, soil and vegetation monitoring, and a Decommissioning Plan. Soil salvage will be conducted under the guidance and supervision of a qualified environmental professional with experience ground-truthing site conditions to confirm/verify soil salvage depths and identify potential hazards (e.g., Professional Agrologist or Registered Professional Biologist with dedicated expertise in soil science).	9.1.8.1 9.1.8.2	Decommissioning	EA follow-up program	Regulatory commitment
9-14	Terrain, Soil, and Organic Matter/Peat	1	Construction monitoring procedures will clearly define and delineate indicators and descriptors to identify potential deficiencies (e.g., types of slope failures and leading causes), triggers and corrective actions. These procedures will identify the key personnel (e.g., managers, superintendents, and technical leads) responsible for document review, approval, and implementation.	9.1.8.1 9.2.8.2	Construction	EA follow-up program	Regulatory commitment
9-15	Terrain, Soil, and Organic Matter/Peat	1	Soil and organic matter/peat monitoring will be conducted during soil salvage and stockpiling activities prior to Construction. This will provide a mechanism to verify that soil and organic matter/peat are delineated, stripped, handled, and stockpiled as recommended, and that there is an inventory of salvaged growth substrates at the Project.	9.1.8.2	Construction	EA follow-up program	Regulatory commitment
9-16	Terrain, Soil, and Organic Matter/Peat	1	Periodic monitoring of soil stockpiles will then be conducted (as/when necessary) during the Operation Phase to evaluate the stability of salvaged soil, e.g., in relation to potential erosion and/or degradation. These monitoring activities will provide a mechanism to verify that mitigation measures are both appropriate and effective and provide a procedure to adapt mitigation measures if/where necessary.	9.1.8.2	Operation	EA follow-up program	Regulatory commitment
9-17	Terrain, Soil, and Organic Matter/Peat	1	Soil inventory data, including volume and location, will be recorded by construction supervisors at the time of soil stockpiling. Soil monitoring procedures will clearly define and delineate indicators and descriptors to identify potential deficiencies (e.g., soil salvage hazards and leading causes), triggers, and corrective actions. These procedures will identify the key personnel (e.g., managers, superintendents, and technical leads) responsible for document review, approval, and implementation.	9.1.8.2	Construction	EA follow-up program	Regulatory commitment
9-18	Terrain, Soil, and Organic Matter/Peat	1	Soil quality monitoring—comprising scheduled collection of soil from permanent sampling locations for analysis of COPC—will be conducted during the Operation Phase. This will provide a mechanism to evaluate potential effects of dust on soil quality, and other interrelated VCs.	9.1.8.3	Operation	EA follow-up program	Regulatory commitment
9-19	Terrain, Soil, and Organic Matter/Peat	1	Soil quality monitoring will be conducted under the guidance and supervision of a qualified environmental professional with experience conducting soil sampling including sample collection, chain of custody and interpretation of data (e.g., Professional Agrologist or Registered Professional Biologist with dedicated expertise in soil science).	9.1.8.3	All phases	EA follow-up program	Regulatory commitment
9-20	Terrain, Soil, and Organic Matter/Peat	1	Soil quality monitoring data will be compiled and reported annually/periodically. Soil quality monitoring procedures will clearly define and delineate indicators and descriptors to identify potential deficiencies (e.g., COPC exceedances), triggers, and corrective actions. These procedures will identify the key personnel (e.g., managers, superintendents, and technical leads) responsible for document review, approval, and implementation.	9.1.8.3	All phases	EA follow-up program	Regulatory commitment

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9-21	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	The ERA will be updated throughout the life of the Project and will provide a key tool for environmental performance reporting.	9.2.4.2.2 9.2.6.2.2	All phases	EIS	Regulatory commitment
9-22	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	Denison is committed: (1) to reduce disturbance to Vegetation and Ecosystems, Listed Plant Species, and Wetlands throughout all Project Phases, and (2) to reclaim the Project Area to an ecological trajectory that aligns with the desired end-land use(s) and regulatory requirements at the completion of the mining tenure. A key step will be to appropriately implement all applicable environmental management plans during the given Project phases. A follow-up strategy is proposed to support existing mitigation and thereby minimize uncertainty in support of these commitments.	9.2.8	All phases	EA follow-up program	Regulatory commitment
9-23	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	Project monitoring and adaptive management plans specific to Vegetation include: - Soil monitoring during salvaging and stockpiling activities will be undertaken. - Progressive reclamation and revegetation of disturbed areas will be monitored in accordance with the Decommissioning Plan.	9.2.8	All phases	EA follow-up program	Regulatory commitment
9-24	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	Where mitigation measures are not deemed to be successful, adaptive management techniques will be employed. Findings during monitoring, as well as revised BMPs, improved scientific methods, and regulatory changes will be incorporated into the environmental management plans, to reduce effects during the lifetime of the Project. Interested Parties, Indigenous communities and organizations, and regulatory agencies will be involved in developing mitigation and adaptive management measures where applicable.	9.2.8	All phases	EA follow-up program	Regulatory commitment
9-25	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	Pre-construction listed plant surveys will be undertaken within the Project Area within ecosites that were not encountered during the 2017 surveys, as well as within selected areas of the Project Area with the potential to support listed plants (e.g., transitional habitats favoured by Alaskan clubmoss). Surveys will be undertaken to verify EA predictions and identify mitigation measures to protect Listed Plant Species, as appropriate. Should Listed Plant Species be identified within the Project Area, site- and species-specific mitigation measures will be developed by a qualified vegetation ecologist to avoid and/or minimize potential Project effects.	9.2.3.2 9.2.8.1	Construction	EA follow-up program	Regulatory commitment
9-26	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	Targeted monitoring and inspection will be undertaken during Construction to verify that mitigation measures to reduce effects on Vegetation and Ecosystems, Listed Plant Species, and Wetlands VCs have been appropriately applied, maintained, and removed, where necessary. Environmental inspectors (on-site monitors) will be present during Construction to verify compliance and evaluate the success of mitigation measures outlined in Section 9.2.5, mitigation and management plans specific to Vegetation including the plans for erosion and sediment control management and monitoring of vegetation, and the Decommissioning Plan, and applicable approval conditions.	9.2.8.2	Construction	EA follow-up program	Regulatory commitment
9-27	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	Vegetation monitoring will be conducted periodically throughout all Project phases to reduce the potential for effects on vegetation associated with routine vegetation clearing and maintenance within the Project Area and to avoid the introduction and spread of invasive plant species. Vegetation monitoring will verify compliance and evaluate the success of mitigation measures outlined in Section 9.2.5, mitigation and management plans specific to Vegetation including plans for erosion and sediment	9.2.8.3	All phases	EA follow-up program	Regulatory commitment

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			control, environmental protection of vegetation and soil, and the Decommissioning Plan, and applicable approval conditions. These procedures will identify the key personnel (e.g., Managers, Superintendents and Technical Leads) responsible for document review, approval and implementation.				
9-28	Vegetation and Ecosystems, Listed Plant Species, and Wetlands	1	Vegetation and soil sampling and laboratory analyses for COPC commenced in 2017 at 10 PSPs for radon (further described in Section 9.2.3.1.2), and will continue to be conducted periodically throughout all Project phases to identify if plants within the Vegetation LSA are accumulating COPC within their tissues. Monitoring for COPC in vegetation will be completed in accordance with the methodologies outlined in the EMS, and as outlined in the ERA (Appendix 10-A in Section 10).	9.2.8.4	All phases	EA follow-up program	Regulatory commitment
9-29	Ungulates, Furbearers, and Woodland Caribou Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	All disturbed areas will be reclaimed during this phase, which is expected to result in positive effects on wildlife/avian habitat.	9.3.4.2.1 9.3.4.2.2 9.4.4.2.1 9.4.4.2.2	Decommissioning		Regulatory commitment
9-30	Ungulates, Furbearers, and Woodland Caribou Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	Project activities will be limited to regular monitoring and occasional inspections and all Project components will be removed, resulting in a reduced risk of vehicle collisions with wildlife, exposure to trace metals and radionuclides, hazardous materials (e.g., spills), and risk of entrapment.	9.3.4.2.2 9.4.4.2.2	Post-decommissioning		Regulatory commitment
9-31	Ungulates, Furbearers, and Woodland Caribou	1	Targeted monitoring programs (described below) will be completed during the Construction, Operation, and Decommissioning phases to verify that Project design and mitigation measures (Section 9.3.5) have been appropriately applied and maintained. Following verification, the success of Project design and mitigation measures will be evaluated to assist in the determination of additional mitigation measure requirements. - wildlife species routinely monitored (e.g., through the Project-wide implementation of the current wildlife card system) throughout the life of the Project in accordance with the management and monitoring plans within the EMS (including implemented setback distances during sensitive time periods, if applicable); and - progressive reclamation and revegetation of disturbed areas (i.e., transitioning into wildlife habitat) monitored in accordance with the Reclamation and Closure Plan.	9.3.8	All phases	EA follow-up program	Regulatory commitment
9-32	Ungulates, Furbearers, and Woodland Caribou	1	An adaptive management process will be employed, after applicable consultations and approvals, where implemented mitigation measures are found to be unsuccessful. Management plans will be considered living documents, and updated when warranted to include input from consultations, monitoring results, regulatory or legislative changes, and any updated, improved, or revised BMPs and scientific methods.	9.3.8 9.4.8	All phases	EA follow-up program	Regulatory commitment

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	Raptors, Migratory Breeding Birds, and Bird Species at Risk						
9-33	Ungulates, Furbearers, and Woodland Caribou Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	If unforeseen adverse effects are identified during follow-up programs, Denison will, as per its ongoing adaptive management process, adjust the existing mitigation measures or, if necessary, develop new mitigation measures to address those effects. This could result in Denison refining or modifying the design and implementation of management plans (see Section 16 Assessment Summary and Conclusions), mitigation measures, and Project operations, with the final approach selected depending on the issue identified. Interested Parties, Indigenous Groups, and government agencies will be involved in developing mitigation and adaptive management measures where applicable.	9.3.8 9.4.8	All phases	EA follow-up program	Regulatory commitment
9-34	Raptors, Migratory Breeding Birds, and Bird Species at Risk	1	Targeted monitoring programs (described below) will be completed during the Construction, Operation, and Decommissioning phases to verify that Project design and mitigation measures (Section 9.4.5) have been appropriately applied and maintained. Following verification, the success of Project design and mitigation measures will be evaluated to assist in the determination of additional mitigation measure requirements. - pre-construction nest surveys conducted in accordance with the EMS prior to the commencement of any vegetation clearing or soil disturbance; - avian species routinely monitored throughout the life of the Project (e.g., through the Project-wide implementation of the current wildlife card system) in accordance with the EMS (including implemented setback distances during sensitive time periods, if applicable); and - progressive reclamation and revegetation of disturbed areas (i.e., transitioning into avian habitat) monitored in accordance with the Reclamation and Closure Plan.	9.4.8	All phases	EA follow-up program	Regulatory commitment
10-1	Worker Health and Safety	1	Workers will also be subject to conventional workplace hazards. These will be managed through a conventional health and safety plan, in compliance with applicable federal and provincial legislation.	10.2.1.1	Construction, Operation, Decommissioning	EMS	Regulatory commitment
10-2	Worker Health and Safety	1	A Radiation Protection Program (RPP) ... will include workplace monitoring and mitigation measures designed to ensure that worker doses are kept as low as reasonably achievable (ALARA).	10.2.3.2	Operation; Decommissioning	EMS	Regulatory commitment
10-3	Worker Health and Safety	1	Under the Radiation Protection Program, a radiation work permit process will be in place for any non-routine work that may involve unusually high exposures, ensuring that risks are assessed and exposure controls are optimized in accordance with the ALARA principle.	Appendix 10-C, section 6.0.	Operation; Decommissioning	EMS	Regulatory commitment
10-4	Worker Health and Safety	1	In the drying area and the packaging/loading area, engineering controls will minimize the dust pathway. Engineering controls will include negative pressure enclosure of source equipment and exhaust, as well as ventilation controls in the main rooms (6 exchanges/hour was assumed). As an administrative control, dust levels in the room will be monitored, and individual worker exposures will be monitored and managed. Under normal operation, workers will not be inside the enclosure. PAPR will be available if needed as a control of last resort, for any non-routine situations, such as any necessary work within the enclosures. The approach will respect the hierarchy of control and will comply with Section 13 of the	10.2.4 ; Appendix 10-C, section 6.0; IR186 and IR187.	Operation	EMS; Engineering Design	Regulatory commitment

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			Uranium Mines and Mills Regulations. Actual dust levels will be confirmed during the commissioning phase and the control system will be optimized to ensure that doses are ALARA.				
10-5	Worker Health and Safety	1	In the core shack, an administrative level of respirable dust equal to ¼ of the ACGIH TLV of 0.27 mg/m ³ has been assumed. Time in the shack will be managed to control dose from inhalation of ore dust. Dust levels will be confirmed during the commissioning phase and the control systems will be optimized to ensure that doses are ALARA. It may be possible to increase air exchange in the core shack, above the planned 6 exchanges per hour, should this be necessary.	10.2.4 ; Appendix 10-C, section 6.0.	Operation	EMS; Engineering Design	Regulatory commitment
10-6	Worker Health and Safety	1	In the precipitate removal area, it was assumed that no more than 3 totes of filter cake will be in the area simultaneously at any time. The external dose from this source could be minimized by managing the quantity of filter cake in the work area, as well as worker proximity.	10.2.4 ; Appendix 10-C, section 6.0.	Operation	EMS	Regulatory commitment
10-7	Worker Health and Safety	1	At the special waste pad, external doses from ore cuttings were assumed to be mitigated by a berm around the pad, which provides shielding. However, this area is a potentially substantial source of external dose for non-routine work inside the berm, and any such work will be minimized.	10.2.4 ; Appendix 10-C, section 6.0.	Operation; Decommissioning	EMS; Engineering Design	Regulatory commitment
10-8	Worker Health and Safety	1	Radon levels will be monitored in the precipitate removal and yellowcake precipitation areas of the ISR plant, and in the core shack, to support management of radon exposure and dose.	10.2.4	Operation	EMS	Regulatory commitment
10-9	Worker Health and Safety	1	In general, it will be necessary to manage work sequence and schedule to avoid prolonged exposures to the identified sources, especially those identified as being significant to worker dose. Doses can be most effectively reduced by reducing exposure times and maximizing distances from the source, as well as by use of protective shielding.	Appendix 10-C, section 6.0.	Operation; Decommissioning	EMS	Regulatory commitment
10-10	Human Health	1	The future permanent resident is a hypothetical adult and one-year-old (male or female) who would reside full time at the Denison camp site after the Post-Decommissioning phase has been fully implemented, in the future centuries. Assumptions for a permanent resident after Post-Decommissioning should be refined near the time of Decommissioning with community input where possible.	10.1.6.1.1	Decommissioning	EMS	Regulatory commitment
10-11	Human Health	1	The presence and concentrations of radionuclides in the receiving environment would be monitored and the associated radiation dose estimates would be periodically reassessed in accordance with the processes outlined in the Environmental Management System.	10.1.6.1.4	All phases	EMS	Regulatory commitment
10-12	Human Health	1	Monitoring should focus on collecting data to verify ERA model predictions, as well as provide data to improve model predictions as the Project begins. Recommended monitoring would support Denison's environmental protection framework with the goal of reducing uncertainty over time through an iterative process. Environmental monitoring would follow requirements and guidance in CSA N288.4-19 (CSA 2019) as well as engagement with local communities	10.1.8/10.1.9	All phases	EMS	Regulatory commitment

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10-13	Human Health	1	Based on some short-term exceedances of air quality criteria at the camp and the fenceline, it is recommended that NO ₂ , particulate matter, and uranium in TSP and PM ₁₀ be monitored as part of any air emissions monitoring plan.	10.1.8	Construction	EA Follow up program	FUP commitment
10-14	Human Health	1	Denison is implementing an environmental monitoring program consistent with requirements and guidance in CSA N288.4-19: <i>Environmental monitoring programs at nuclear facilities and uranium mines and mills</i> (CSA 2019). Monitoring would focus on providing data to verify the predictions made by the ERA, to refine the models used in the ERA, and to reduce the uncertainty in the predictions made by the ERA. The environmental monitoring program should include collection of surface water, sediment, and soil samples as well as fish tissue samples, benthic invertebrate tissue samples, and country foods such as blueberries. Monitoring locations would be focused on Whitefish Lake, McGowan Lake and Russell Lake. Monitoring COPCs would include those identified as COPCs in the ERA, including metals and uranium-238 series radionuclides, and chloride and sulphate in lake waters. Monitoring could extend to include other COPCs for other purposes, such as meeting regulatory requirements for monitoring, or addressing COPCs of public interest based on experience at other uranium mines and process plants.	10.1.8	All phases	EMS	Regulatory commitment
10-15	Human Health	1	Denison will include PM ₁₀ and PM _{2.5} to the air quality monitoring plan during construction will be added to Section 6.1.8 and Section 16 in the EIS.	6.1.8, 16	Construction	EA follow-up program	FUP commitment
10-16	Human Health	1	Canadian Ambient Air Quality Standards (CAAQS) established under the national Air Quality Management System (CCME 2021b) were used for information purposes, but not selected as screening criteria. For future mitigation and follow up monitoring activities, the CAAQS will be utilized as the applicable standard.	10.1.4.2.1	Construction (when monitoring will occur)	EA follow-up program	FUP commitment
10-17	Human Health	1	To mitigate potential adverse effects on surface water quality, Denison will do the following: - Develop and implement a site-wide water management plan that provides an integrated framework to manage water quality that includes provision for water management practices for each of the primary site aspects, as well as areas of the site where contact water is expected. - Maximize the recycle and reuse of process water to reduce freshwater intake and release to Whitefish Lake. - Design discharge diffuser/outfall to provide effective mixing and dilution and to provide discharge flows that do not detrimentally affect sediments. - Develop site-specific effluent treatment to treat COPCs to appropriate release limits in accordance with federal and provincial standards and licence/permit conditions. - Discharge effluent under a scenario that will meet provincial and federal discharge criteria and be identified through permitting. Scenarios may include: - Discharge at a fixed rate while maintaining an appropriate minimum dilution ratio (i.e., discharge when able to meet the required dilution ratio and cease discharge during periods when unable to meet the necessary dilution ratio). - Discharge under a variable waste load allocation (i.e., discharge an appropriate effluent volume based on flow in the receiver to maintain minimum dilution ratio). - Manage discharge via a hybrid of these (i.e., discharge effluent at a fixed rate to maintain the required dilution ratio, but the fixed rate is varied on a seasonal basis [based on flow]). - Collect and monitor contact water to determine whether treatment is required prior to release to the environment and inform optimal levels of treatment. - Maintain the water management system in place during decommissioning until such time that water quality is suitable to release to the environment.	10.1.5	Ongoing throughout life of mine	EA follow-up program	Regulatory requirement

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			- Monitor and manage effluent, including contingency for effluent treatment as may be required, so that water discharge objectives are achieved as defined in applicable provincial and federal regulatory instruments. - Design and implement an Environmental Code of Practice that defines action levels and appropriate steps to be taken to mitigate elevated concentrations of chemical and radiological COPCs in treated effluent discharge to acceptable levels. - Implement Project-specific monitoring programs (e.g., effluent monitoring plan, environmental monitoring plan) that includes monitoring treated effluent, surface water and sediment quality and applying adaptive management if necessary. - Work with the associated communities to develop and implement the Project-specific monitoring programs and a framework to share the results for the purpose of assessing the performance of the water management system. - Develop and implement a decommissioning and reclamation plan to decommission and transfer the site to the Province under the Institutional Control Program.				
10-18	Human Health	1	To mitigate potential effects on air quality, Denison will do the following: - Use scrubbers on the ISR stack to control emissions. - Collect dust measurements during Construction, Operation, and Decommissioning, and determine whether the actual effect of Project activities is different than what was modelled. - Create and implement a dust management plan, including the application of water to control fugitive dust, in addition to other operational strategies to assist in dust control. - Plan vehicle and equipment routes to minimize travel distances, where possible. - Employ standard operating procedures and complete regular inspections of equipment machinery to make sure it is in good working order. - Avoid dust-generating activities (e.g., earthworks, material handling) during dry or high wind conditions. - Avoid dropping material from height. - Make sure all exhausts (e.g., mobile equipment, generators) are in good working condition. - Turn off vehicles and equipment when not being used. - Minimize or reduce vehicle and equipment speed by enforcing speed limits. - Apply water at least twice per day to unpaved roads and surfaces (during summer months). - Maintain unpaved road surfaces via grading or other maintenance practices to reduce the amount of silt (i.e., fines) present in the roadbed material.	10.1.5	Ongoing throughout life of mine	EA follow-up program	Regulatory requirement
11-1	ILRU/OLRU - Perceived Suitability of Lands and Resources	1	Denison will use high-quality, low sound emission equipment and regular maintenance will reduce noise associated with Project activities	11.1.5/ 11.2.5	All phases	Engineering design	Regulatory requirement
11-2	ILRU/OLRU - Perceived Suitability of Lands and Resources	1	High-noise activities will be located further away from human receptor(s), such as a local leaseholder	11.1.5/ 11.2.5	All phases	Engineering design	Regulatory requirement
11-3	ILRU/OLRU - Perceived Suitability of Lands and Resources	1	Noise-generating equipment will be situated behind on-site obstructions	11.1.5/ 11.2.5	All phases	Engineering design	Regulatory requirement
11-4	ILRU/OLRU - Perceived Suitability of	1	Monitoring will take place, including collecting sound level measurements from these sources (e.g., in the vicinity of the wellfield, the concrete batch plant, and along the access road from Highway 914) once they are operating and determine whether its actual impact is lower than that which was modelled	11.1.5/ 11.2.5	All phases	Environmental monitoring program	Environmental monitoring program

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	Lands and Resources						
11-5	ILRU/OLRU - Perceived Suitability of Lands and Resources	1	To control road dust during summer (May to October), water and/or chemical dust suppressant will be applied to all site roads. In the winter months (November to April), natural mitigation from snow/ice can help control unpaved road . vehicle speeds at the Project site are limited to 40 km/h along the site haul roads, which will also limit the amount of road dust generated. The roads are also maintained during the summer months using a grader, which is a lesser source of particulate matter along the roads.	11.1.5/ 11.2.5	All phases	Management plans, programs, and policies	Social responsibility
11-6	ILRU/OLRU - Perceived Suitability of Lands and Resources	1	Air emissions will be reduced by: - directing processing plant exhaust from drying and packaging areas through a stack prior to release outside of the building; - designing the stack height based on results of air dispersion modelling to be an appropriate height for optimal dispersion; and - employing battery-powered light vehicles where practical to reduce air emissions and noise levels and improve energy efficiency	11.1.5/ 11.2.5	All phases	Engineering design	Regulatory requirement
11-7	ILRU/OLRU - Perceived Suitability of Lands and Resources	1	Strategies to avoid or reduce the likelihood of total suspended particulate and particulate matter exceedances include: - limiting material handling activities during dry conditions and high winds; - limiting vehicle and equipment speeds on unpaved roadways/surfaces; - optimizing the number of vehicle and equipment movements and minimize travel distances, where possible; - maintaining unpaved roads via grading or other maintenance practices to reduce the amount of fine particles available for dispersion; and - collecting dust measurements during Project phases to determine whether the actual effect of Project activities is lower than what was modelled	11.1.5/ 11.2.5	All phases	Management plans, programs, and policies	Social responsibility
11-8	ILRU/OLRU - Perceived Suitability of Lands and Resources Quality of Life - Cultural Expression	1	Denison will implement an Environmental Monitoring Program consistent with Canadian Standards Association for nuclear facilities and mines. Monitoring will focus on providing data to verify the predictions made by the ERA, to refine the models used in the ERA, and to reduce the uncertainty in the predictions made by the ERA. The Environmental Monitoring Program will include collection of surface water, sediment, and soil samples as well as fish tissue samples, benthic invertebrate tissue samples, and country foods such as blueberries. Monitoring locations would be focused in the area of Whitefish Lake, McGowan Lake, and Russell Lake	11.1.5/ 11.2.5/ 12.1.5	All phases	Environmental monitoring program	Environmental monitoring program
11-9	ILRU/OLRU - Perceived Suitability of Lands and Resources Quality of Life - Cultural Expression	1	The KML propose that working cooperatively with Denison is a path towards reconciliation. For each concern brought forward by KML, KML proposed that each concern will be reviewed by Denison for the best possible solution and that effects on land and resources be either nil or minimal. This approach is consistent with Denison's Indigenous Peoples Policy	11.1.5/ 11.2.5/ 12.1.5	All phases	Ongoing engagement	Social responsibility
11-10	OLRU - Perceived Suitability of Lands and Resources	1	Surface lease agreements, which are required to conduct mining in Saskatchewan, also contain commitments for environmental protection, occupational health and safety, and socio-economic benefits for residents of Saskatchewan's North (Government of Saskatchewan 2018). One provision within surface lease agreements is compensation for commercial loss of income. Payments are typically made to individuals who: 1) held a lease or permit to use the lands immediately prior to the establishment of the mine's surface lease; and 2) used the land to generate commercial income, such as from trapping (Government of Saskatchewan 2018b). Should the need arise, compensation for loss of income may be disbursed to the trapper selected to take up trapping in the Project Area.	11.2.5	All phases	Management plans, programs, and policies	Regulatory requirement; Social responsibility

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
11-11	Heritage Resources	1	A Human Resources Management Plan has been developed to mitigate potential effects of the Project to Heritage Resources. The plan outlines steps Denison will take if a new heritage site is identified during activities taking place over the life of the Project. The management of archaeological resources includes the assessment of the discovery by a qualified archaeologist and mitigation measures including avoidance of the site, shovel testing, systematic and intensive shovel testing, excavation, and/or construction monitoring. The HRMP outlines mechanisms for Indigenous engagement including the communities, implementation of appropriate cultural protocols, the potential for storage of artifacts outside of the Royal Saskatchewan Museum, and the inclusion of Indigenous field assistants when possible.	11.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-1	Quality of Life - Cultural Expression	1	To reduce the potential negative effects of Project employment, Denison will implement culturally sensitive employment policies that support the attraction and retention of an Indigenous workforce. Encouragement will be made to speak languages of choice while at the site, except during safety sensitive situations. Denison will work with the Indigenous COI to make sure understanding exists regarding the culturally important periods for ERFN and KML #9 (Pinehouse), including important harvest times and cultural camp schedules. Denison will facilitate Indigenous employees taking time off to participate in cultural activities with family or with the broader community, where appropriate.	12.1.5	All phases	Ongoing engagement; Management plans, programs, and policies	Social responsibility
12-2	Quality of Life - Community Well-being and Infrastructure and Services	1	Establishment of health and wellness programming on-site, which will be accessible to all workers	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-3	Quality of Life - Community Well-being and Infrastructure and Services	1	A primary care paramedic will be contracted to provide care on site through all phases of the Project.	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-4	Quality of Life - Community Well-being and Infrastructure and Services	1	Denison will provide the appropriate level of First Aid and CPR training to employees to ensure adequate coverage	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-5	Quality of Life - Community Well-being and Infrastructure and Services	1	Health promotion and on-site health care programming will be designed to reflect the needs/interests of the workforce and may include topics such as tobacco cessation, health and stroke awareness, diabetes awareness, mental health and addictions support, cancer awareness, and nutrition awareness. Immunization programs may be administered through the on-site health team	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-6	Quality of Life - Community Well-being and Infrastructure and Services	1	Programming may include the development of life skills programming to address topics such as managing personal finances and coping with stressful situations.	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-7	Quality of Life - Community Well-being and Infrastructure and Services	1	Recreation options will be offered on site to promote health and wellness.	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-8	Quality of Life - Community Well-being and Infrastructure and Services	1	Denison will provide space for an on-site Elder counsellor to provide culturally relevant programing and support	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility

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12-9	Quality of Life - Community Well-being and Infrastructure and Services	1	An Employee and Family Assistance Program (EFAP) will also be part of each worker's benefits package and will provide supports to individuals and their families that may not be readily available in their communities	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-10	Quality of Life - Community Well-being	1	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.	12.2.5	All phases	Management plans, programs, and policies	Social responsibility
12-11	Quality of Life - Community Well-being and Infrastructure and Services	1	First aid facilities will be supplied during Construction.	12.2.5/ 12.3.5	Construction	Management plans, programs, and policies	Social responsibility
12-12	Quality of Life - Community Well-being	1	A no alcohol and drug policy will be established at the Project site.	12.2.5	All phases	Management plans, programs, and policies	Social responsibility
12-13	Quality of Life - Community Well-being and Infrastructure and Services	1	Denison's Environment, Health, Safety, and Sustainability Policy will be enforced.	12.2.5/ 12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-14	Quality of Life - Community Well-being	1	Liaison with LSA communities and relevant authorities (e.g., RCMP, health and service providers) will continue	12.2.5	All phases	Ongoing engagement	Social responsibility
12-15	Quality of Life - Community Well-being	1	Denison will plan a workforce transition plan prior to decommissioning of the mine.	12.2.5	Prior to decommissioning	Management plans, programs, and policies	Social responsibility
12-16	Quality of Life - Community Well-being	1	Culturally sensitive employment policies that support the Indigenous workforce will be implemented (e.g., having an Elder representative at the Project site to provide cultural programming)	12.2.5	All phases	Management plans, programs, and policies	Social responsibility
12-17	Quality of Life - Infrastructure and Services	1	Air transportation will be used to transport most workers between the Project site and designated pick-up and drop-off points in communities.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-18	Quality of Life - Infrastructure and Services	1	All drivers serving the Project will receive appropriate training related to the nature of materials being transported, including driver training to the highest standards based on the transportation of nuclear substances.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-19	Quality of Life - Infrastructure and Services	1	Vehicles transporting dangerous goods and/or hazardous products will display required placards and labels in accordance with provincial legislation and will follow designated highway corridors.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-20	Quality of Life - Infrastructure and Services	1	An Emergency Response Plan will be developed in case there is a spill during the transportation of dangerous goods and/or hazardous products.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-21	Quality of Life - Infrastructure and Services	1	All materials transported by truck will be compliant with any weight restrictions or permits, spring road restrictions, or geometric constraints set out by the Saskatchewan MOHI.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-22	Quality of Life - Infrastructure and Services	1	Denison will maintain Project roads and the main access road to the site.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility

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12-23	Quality of Life - Infrastructure and Services	1	Require Denison truck traffic to slow to 40 km/hr for a minimum of 2.5 km on either side of the culture camp(s) in September and October (dates may be adjusted at the communities' direction).	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-24	Quality of Life - Infrastructure and Services	1	Immunization programs may be administered through the on-site health team.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-25	Quality of Life - Infrastructure and Services	1	Workforce education will be provided to encourage healthy lifestyles.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-26	Quality of Life - Infrastructure and Services	1	Ongoing communication between Denison, LSA communities, and relevant authorities (e.g., RCMP, health and service providers) to provide updates, discuss any Project-related concerns, and make sure that the required resources are in place	12.3.5	All phases	Ongoing engagement	Social responsibility
12-27	Quality of Life - Infrastructure and Services	1	Mandatory safety orientations will be held for contractors and workers.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-28	Quality of Life - Infrastructure and Services	1	Health and safety management programs will be developed for Construction, Operation, and Decommissioning.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-29	Quality of Life - Infrastructure and Services	1	Workers will be trained in fuel handling, equipment maintenance, and fire prevention and response measures.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-30	Quality of Life - Infrastructure and Services	1	Project-specific contingency, emergency response, and spill prevention plans will be developed to reduce the likelihood and severity of accidents and potential fires.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
12-31	Quality of Life - Infrastructure and Services	1	Based on the outcomes of discussions with COI, Denison may provide support and/or training to local emergency services to make sure that staff are adequately prepared in the unlikely event of an accident, malfunction, or spill on Highways 914 or 165. This may include the provision of speciality materials or equipment to deal with an emergency response.	12.3.5	All phases	Management plans, programs, and policies	Social responsibility
13-1	Economics	1	Denison, through a Human Resource Management 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.	13.4	All phases	Management plans, programs, and policies	Social responsibility
13-2	Economics	1	Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan. This procurement approach may consider advance sharing of purchasing requirements of goods and services throughout all phases of the Project, efforts to increase the capacity and capabilities of businesses to increase successful bidding outcomes, and the development of a business registry.	13.4	All phases	Management plans, programs, and policies	Social responsibility
13-3	Economics	1	Denison will plan a workforce transition plan prior to Decommissioning of the mine.	13.4	All phases	Management plans, programs, and policies	Social responsibility
13-4	Economics	1	Denison has previously compensated a trapper potentially affected by exploration activities in and around the Project based on the potential for commercial loss, who has since passed away. This will be assessed going forward based on the potential for the Project to negatively effect commercial loss, and where appropriate, Denison will compensate accordingly.	13.4	All phases	Management plans, programs, and policies	Social responsibility

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13-5	Economics	1	Denison will negotiate with the Province of Saskatchewan to develop the Project's Surface Lease Agreement and the Human Resource Development Agreement, which will outline measures in relation to socio-economic parameters related to the Project.	13.4	All phases	Management plans, programs, and policies	Regulatory requirement; Social responsibility
14-1	Accident and Malfunctions	1	With respect to design related mitigation commitments the A&M assessment identified the following: • Secondary containment in fuel storage and dispensing areas • Firefighting system • Onsite traffic control (speed limits, signage) • Preventive and routine maintenance for vehicles • Storage inspection, maintenance (for infrastructure, including related to ISR operations) • Primary and secondary containment for drilling mud • Freeze wall (as a secondary containment feature) • Freeze wall monitoring • Lined collection ponds • Site grading to collection areas • Collection pond sized to accommodate PMP • Traffic control measures • Ambient air monitoring (releases to air) • Containment (with reference to stored chemicals) • Remote monitoring systems (for piping systems for ISR well field) • Pipes in trenches and secondary containment for ISR well field • No open drain from pumphouse (for ISR well field) • Redundancy in design (for ISR well field and freeze wall) • Control of pump and injection wells (for ISR well field and freeze wall) • Production plant containment, process sumps and secondary containment • Production plant ventilation • Line pad (clean rock storage) • Surface water monitoring • Groundwater monitoring • Double lined pad (special waste pad) • Leak detection (special waste pad) • Line pad (gypsum [clean] ppt) • Wind erosion control measures (gypsum [clean] ppt) • Double lined pad (iron [contaminated] ppt) • Leak detection (iron [contaminated] ppt) • Piping design pressure higher than pumps shutoff pressure (WTP) • Process monitoring (WTP)	14.0	All Phases (as appropriate)	EMS; Engineering Design	FUP commitment; Regulatory commitment (includes EMS, plans/procedures; Acts, Regs); Social responsibility commitment

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			- Secondary containment (WTP clarifier) - Recirculation of off-spec water to the process (WTP) - Ponds designed for PMP/PMF (water management infrastructure) - Fencing (of ponds to exclude wildlife) - Secondary containment (electrical transformers) - Redundancy (fire protection system)				
14-2	Accident and Malfunctions	1	With respect to Programs the A&M assessment identified the following: - Quality Management Program - Occupational Health and Safety Program - Radiation Protection Program - Environmental Protection Program - Emergency Preparedness and Response Program - Fire Safety Program - Maintenance Program - Wellfield and Surface Water Program	14.0	All Phases (as appropriate)	EMS; Engineering Design	FUP commitment; Regulatory commitment (includes EMS, plans/procedures; Acts, Regs); Social responsibility commitment
14-3	Accident and Malfunctions	1	With respect to Plans the A&M assessment identified the following: - Occupational health and safety plan - Personnel training and orientation plan - Spill management and response plan - Spill management and emergency response plan - Fire safety plan - Travel management plan (traffic) - Air traffic control plan (for air traffic) - Ground traffic control plan (for air strip) - Wildlife management plan - Waste management plan - Radiation protection plan - Traffic and transportation plan	14.0	All Phases (as appropriate)	EMS; Engineering Design	FUP commitment; Regulatory commitment (includes EMS, plans/procedures; Acts, Regs); Social responsibility commitment
14-4	Accident and Malfunctions	1	With respect to Procedures the A&M assessment identified the following: - Process monitoring and operational procedures - Wellfield development and control procedures - Security procedures - Environmental monitoring procedures - Personnel training procedures - Regular and preventive inspection and testing procedures - Surface water and flood management procedures	14.0	All Phases (as appropriate)	EMS; Engineering Design	FUP commitment; Regulatory commitment (includes EMS, plans/procedures; Acts, Regs); Social responsibility commitment

ID (EIS Section-chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
14-5	Accident and Malfunctions	1	Denison is open to considering jointly (with Cameco and Highways) to develop a dusting monitoring plan during the six months of the year when the roads have no snow/ice cover?	TRC 104	All phases	EMS (Transportation Management)	
14-6	Accident and Malfunctions	1	Denison will validate emergency response plan documentation associated with the transport of dangerous goods developed by third-party contractors responsible for that transport.	TRC 113	All phases	EMS (Transportation Management, Transportation of Dangerous Goods)	
14-7	Accident and Malfunctions	1	Denison will assess radiological dose to workers that may result from Accident and Malfunction Assessment Bounding Scenarios involving vehicular accidents resulting in releases of radioactivity to the aquatic (see Section 14.6.1 of the EIS) and terrestrial (see Section 14.6.7 of the EIS) environments as part of the licensing process.	IR-216	All phases	Licensing	Regulatory commitment (includes EMS, plans/procedures; Acts, Regs)
15-1	Effects of the Environment on the Project	1	Denison would be an industrial and commercial operator as defined in section 2(l) of <i>The Wildfire Act</i> and would have fire suppression obligations pursuant to section 19. This includes responsibility for initially controlling and extinguishing a wildfire burning within a part of designated lands on which the Project actively being conducted or is located. Denison must also submit a wildfire prevention and preparedness plan annually before the start of both the construction and operational phases of the Project in accordance with Section 20 of <i>The Wildfire Act</i> . The wildfire prevention and preparedness plan will include details outlined in <i>The Wildfire Act</i> including, but not limited to: a description of measures to be taken to protect infrastructure and assets from a wildfire threat, a map showing the location of work activities, the camp and its layout, road access, fuel types, water sources and the location of wildfire suppression equipment.	Section 15 / TRC 21, TRC-23, TRC-24, TRC-25	All phases	EMS (Fire Protection Program)	Regulatory commitment (<i>The Wildfire Act</i>)
15-2	Effects of the Environment on the Project	1	Denison understands that if major fires are present along the transportation route, then there may be temporary delays of material to and from the site. Denison would, if necessary, issue a no-travel order in the event that potentially serious or unsafe road conditions could contribute to a traffic accident (e.g., forest fires in proximity transportation routes). The Project will be able to operate safely during any temporary delays in transportation. In terms of worker health and safety while forest fire smoke is present, Denison will consider this through the Occupational Health and Safety Program. Information on 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 related to forest fires will be included in the Emergency Preparedness and Response Program. Additionally, Project plans related traffic, travel, and transportation will be developed through the permitting and licensing processes as the Project moves forward and transportation management as related to extreme events (including fire) would be considered in these plans.	TRC-116	All phases	EMS (Fire Protection Program, Occupational Health and Safety Program, Emergency Preparedness and Response Program)	Regulatory commitment
15-3	Effects of the Environment on the Project	1	Denison will develop an Emergency Preparedness and Response Program for the Project to address forest fires and extreme weather that may occur.	Section 15.3, 15.4, and 15.5	All phases	EMS (Fire Protection Program, Occupational Health and Safety Program, Emergency Preparedness and Response Program)	Regulatory commitment

ID (EIS Section- chronological number)	VC/KI (as applicable; related to mitigations)	Last Updated (register version)	Details of Commitment	EIS Section or IR/TRC	Project Phase	Commitment Tracker Method	Scope of Commitment
						Response Program)	

Table 3-2 Denison's Commitments to the Public, Indigenous Nations and Communities

ID	Last Updated (register version)	Details of Commitment	Commitment to	Documented In	Project Phase	Commitment Tracker Method	Scope of Commitment
01	1	Denison has previously compensated a trapper potentially affected by exploration activities in and around the Project based on the potential for commercial loss, who has since passed away. This will be assessed going forward based on the potential for the Project --to negatively effect commercial loss, and where appropriate, Denison will compensate accordingly.----	The ERFN Trapper	Section 4, Appendix 4-B and Section 13.3	All phases	Management plans, programs, and policies	Social responsibility
02	1	In 2023, ERFN and Denison concluded an Agreement in respect of the Project that provides, among other matters, various procedural and substantive commitments by Denison to ERFN and the support and consent of ERFN for the development and operation of the Project in a sustainable manner which respects ERFN's inherent, Aboriginal and Treaty rights, advances reconciliation with Indigenous peoples, and provides economic opportunities and other benefits to ERFN.	ERFN	Section 4.3.2.1.2	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
03	1	Denison is committed to engagement with ERFN where input will be solicited and opportunity for document review will be provided, as necessary, for the Environmental Management Program, including development of the Heritage Resource Management Plan, Emergency Preparedness and Response Plan, and Environmental Effects Monitoring Programs. Denison and ERFN have an agreed upon process for such activities in the future.	ERFN	Section 4.3.2.1.4 Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
04	1	Prior to executing decommissioning activities, Denison shall prepare and submit a detailed decommissioning plan (DDP) to regulators for acceptance. In this case the DDP would reflect input that will be solicited from ERFN and others prior to its submission and would also be informed by conditions on the ground at the Project site at that time, operational experience that has been gained and the regulatory landscape at that time. The decommissioning plan, including the mining area decommissioning objectives, will evolve over time becoming more detailed and specific as the Project advances. Denison is committed to working with ERFN to solicit input through this process.	ERFN	Section 4, Appendix 4-B,	Prior to decommissioning	Management plans, programs, and policies	Social responsibility, Regulatory requirement
05	1	Denison is committed to continued dialogue with ERFN on the details related to the sale, transport, off-site processing, and final disposal of the process precipitates.	ERFN	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
06	1	Effluent-based and receiver-based monitoring plans will be developed as the Project moves forward and Denison is committed to working with ERFN in that process.	ERFN	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
07	1	Denison is committed to including a consultation element with ERFN in the Heritage Management Plan, should an artifact be found during the development of the Project.	ERFN	Section 4, Appendix 4-B	All phases	Ongoing engagement	Social responsibility
08	1	Denison is committed to working with ERFN to understand how follow-up programs might be executed at the community level to address community perspectives.	ERFN	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility

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09	1	Denison will work with ERFN to align the ERA updates and reviews of those updates as recommended.	ERFN	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
10	1	To address potential concerns specific to Project related effects to wildlife species of interest to the Indigenous Communities of Interest (COIs), Denison has committed to collaborating with ERFN and KML on a monitoring regime suited to each of their interests and needs. As part of this program, Denison and the Indigenous COIs will be sharing information in an agreed upon fashion, about agreed-upon species of interest.	ERFN, KML, NVP	Response to FIRT IR-129	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
11	1	Denison continues to work with its Indigenous Communities of Interest and has committed to collaborating with ERFN and KML on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. It is expected that the data collected through such monitoring regimes would also be relevant to other Indigenous nations who may have interest in the Project.	ERFN, KML, NVP	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
12	1	Denison continues to work with its Indigenous Communities of Interest and has committed to collaborating with ERFN and KML on details and updates to the decommissioning plan which includes mining area remediation plans and associated post-decommissioning modelling of groundwater from the remediated mining area, suited to each of their interests and needs. As part of these updates, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that updates to the decommissioning plan and groundwater modelling would also be relevant to other Indigenous nations who may have an interest in the Project.	ERFN, KML, NVP	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
13	1	Denison continues to work with its Indigenous Communities of Interest and has committed to collaborating with ERFN and KML on a community specific monitoring regime, suited to each of their interests and needs. Denison has committed to engagement with ERFN and KML as it relates to effluent discharge criteria, suited to each of their interests and needs.	ERFN, KML, NVP	Section 4, Appendix 4-B	All phases	Ongoing engagement	Social responsibility
14	1	Denison will establish an Emergency Preparedness and Response Program to 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.	ERFN, KML, NVP	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies	Social responsibility
15	1	Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities.	ERFN, KML, NVP	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies	Social responsibility
16	1	Denison's vision in respect of this concern is that Denison and KML work together as partners in discussions about highways with the Provincial Government. However, in respect of actions Denison can undertake regarding traffic along the road at times important for the undertaking of cultural activities, Denison commits to (Section 12): 1) Assisting KML with the clear identification of the forthcoming culture camp along highway 914 (providing clear signage)	KML, NVP	Section 4, Appendix 4-B and Section 12.3.5	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility

ID	Last Updated (register version)	Details of Commitment	Commitment to	Documented In	Project Phase	Commitment Tracker Method	Scope of Commitment
		2) Having Project vehicle slow down to 40km/hr from mid-August to mid-October, during the times when KML members may be using the portion of the road near the culture camp. To be specific, this includes 2.5km before the entry into the culture camp, and 2.5km after the entry into the culture camp.					
17	1	Denison and the YNLR have identified the need to further discuss how cumulative effects was undertaken in relation to the Project, and have each committed to meeting in the first quarter of 2024.	YNLR	Section 4.3.4.2.5	All phases	Ongoing engagement	Social responsibility
18	1	Denison acknowledges that the Hatchet Lake Denesųliné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųliné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS, including in Section 3, Section 4, and Section 11.	YNLR	Section 4, Appendix 4-B	All phases	EIS (revised draft and final versions)	Social responsibility
19	1	Denison continues to work with its Indigenous Communities of Interest. Denison is committed to continual improvement in relation to such collaborative monitoring programs, in order to adapt to areas of interest which can change over time. YNRL will be informed throughout the monitoring program design and implementation process.	YNLR	Section 4, Appendix 4-B	All phases	Ongoing engagement	Social responsibility
20	1	Denison has been collaboratively working with the Nuhenéné through the YNLR office in a mutually agreed upon manner and will continue to do so.	YNLR	Section 4, Appendix 4-B	All phases	Ongoing engagement	Social responsibility
21	1	A Capacity Funding Agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. As part of this study agreement, Denison agreed to fully fund the Métis Knowledge Study. Denison received the Métis Knowledge Study from the MN-S on October 24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.	MN-S	Section 4, Appendix 4-B	All phases	EIS (revised draft and final versions)	Social responsibility
22	1	Denison has updated the revised draft EIS executive summary to acknowledge that the Project falls within the MN-S Homeland.	MN-S	Section 4, Appendix 4-B Executive summary	All phases	EIS (revised draft and final versions)	Social responsibility
23	1	The specific details related to hazardous waste management will be documented as part of the overall waste management program that will be developed as the Project advances from the environmental assessment process into licensing and permitting. Hazardous wastes will be managed consistent with regulatory requirements, using licensed third-party waste management/haulage providers and licensed waste management facilities. Denison will inform the MN-S and relevant locals when such documentation has been prepared through engagement mechanisms in place at that time.	MN-S	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
24	1	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3 and is committed to such engagement with respect to decommissioning planning, mitigation, and monitoring.	MN-S	Section 4, Appendix 4-B	All phases	Ongoing engagement	Social responsibility
25	1	Denison has been discussing the interests and concerns identified by PCBN on an on-going basis since March of 2023, and will continue to share information regarding the Project.	PCBN	Section 4, Appendix 4-B	All phases	Ongoing engagement	Social responsibility
26	1	Denison is committed to collaborating with Indigenous peoples and communities to build long-term, respectful, trusting, and mutually beneficial relationships. With respect to using Kitsaki-owned businesses to support	LLRIB	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility

ID	Last Updated (register version)	Details of Commitment	Commitment to	Documented In	Project Phase	Commitment Tracker Method	Scope of Commitment
		Denison's activities, Denison is proud of the work we have done to date with Kitsaki Management-owned companies including CanNorth and Northern Resource Trucking, and understand the opportunities for further work in the future as the Project progresses. Denison also understand the interests in general employment opportunities at the Project once approval is received to proceed, and are happy to have already received the contact information for the Community Relations Liaison Officer for Lac La Ronge Indian Band (LLRIB). This helpful contact will ensure that we have a fulsome listing of entities to which employment opportunities can be shared over the next while. Further, we understand as a company working in northern Saskatchewan, Denison wishes to respect and support efforts and initiatives that our neighbours, such as LLRIB feel are important.					
27	1	The plans within the air quality management program will incorporate monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested.	BNDN	Section 4, Appendix 4-B	All phases	Management plans, programs, and policies Ongoing engagement	Social responsibility
28	1	BNDN will be informed throughout the monitoring program design and implementation process.	BNDN	Section 4, Appendix 4-B	All phases	Ongoing engagement	Social responsibility
29	1	Denison will work with Indigenous COIs to understand culturally important periods relative to harvest times and cultural camps to facilitate Indigenous employees taking time off to participate in such activities.	Indigenous COIs	Section 4, Appendix 4-B and Section 12.1.5	All phases	Ongoing engagement	Social responsibility
30	1	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 (such as Northlands College) 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.	LSA communities	Section 4, Appendix 4-B and Appendix 4-C Section 13.4	All phases	Management plans, programs, and policies	Social responsibility
31	1	Denison will establish a procurement approach throughout all phases of the Project, prioritizing the procurement of goods and services for the Project toward businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan. This procurement approach may consider advance sharing of purchasing requirements of goods and services throughout all phases of the Project, efforts to increase the capacity and capabilities of businesses to increase successful bidding outcomes, and the development of a business registry.	LSA communities	Section 4, Appendix 4-B and Appendix 4-C and Section 13.4	All phases	Management plans, programs, and policies	Social responsibility
32	1	Denison remains committed to maintaining positive relationships with Indigenous communities and will be open to discussion on any issues or concerns that arise over the course of the Project.	All	Section 4.2 and Section 4.3 Section 4, Appendix 4-B, Appendix 4-C	All phases	Ongoing engagement	Social responsibility

ID	Last Updated (register version)	Details of Commitment	Commitment to	Documented In	Project Phase	Commitment Tracker Method	Scope of Commitment
33	1	Access north of the Key Lake gatehouse on Highway 914 is restricted and provides for controlled access for employees of northern mines, Indigenous resource harvesters from select communities, cabin owners, and lease holders.	All	Section 4, Appendix 4-B, Appendix 4-C Section 12.1 and Section 12.3	All phases	Management plans, programs, and policies	Social responsibility
34	1	Mitigation measures associated with potential effects to cultural continuity (including knowledge transfer and language) are described in Section 12.1.5 and include: - Implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation - Using a commuter rotation system has also shown to be effective in allowing Indigenous employees continued opportunities to spend time on the land, and important factor in the transmission of knowledge and language. Encouragement to speak languages of choice while at the site, except during safety sensitive situations, will be made.	All staff	Section 4, Appendix 4-B and Section 12.1.5	All phases	Management plans, programs, and policies	Social responsibility
35	1	Denison will provide space for an on-site Elder counsellor to provide culturally relevant programing and support.	All staff	Section 12.2.5	Operations	Management plans, programs, and policies	Social responsibility
36	1	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.	All staff	Section 12.2.5	Operations	Management plans, programs, and policies	Social responsibility
37	1	Services and programs will be provided on-site and will be accessible to workers. These services and programs may alleviate pressures on social and health services within LSA communities.	All staff	Section 12.3.5	Operations	Management plans, programs, and policies	Social responsibility
38	1	Health and wellness programming will be established on-site, including recreation options. Health promotion and on-site health care programming will be designed to reflect the needs and interests of the workforce and may include tobacco cessation, health and stroke awareness, diabetes awareness, mental health and additions support, cancer awareness, and nutrition awareness, among others.	All staff	Section 12.3.5	Operations	Management plans, programs, and policies	Social responsibility
39	1	Programming may include the development of life skills programming to address issues such as coping with stressful situations and/or managing personal finances.	All staff	Section 12.3.5	Operations	Management plans, programs, and policies	Social responsibility

4 References

- Canadian Nuclear Safety Commission (CNSC). 2023. Letter J. Way (CNSC) to J. Switzer (Denison) *RE: Results of the Federal-Indigenous Review Team technical review of the October 21st, 2022. Draft Environmental Impact Statement Submission for the proposed Wheeler River Project*. e-Doc: 6991467. March 20, 2023.
- Denison Mines Corp. (Denison). 2022. Wheeler River Project. Draft Environmental Impact Statement. October 2022.
- Saskatchewan Ministry of Environment, Environmental Assessment Branch (SK EAB). 2021. Guidelines for the Terms of Reference and Environmental Impact Statement. November 2021.