Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement

Number	Source	Reference to EIS[1], appendix, or TSD	Comment Summary (all original submissions can be found on Canadian Impact Assessment Registry reference: 80171)	Denison Response
1	Lac La Ronge Indian Band (LLRIB) (February 9, 2023)	General	Resource development projects in the Traditional Territory of LLRIB have had significant impact to community members and their traditional way of life. LLRIB is concerned about potential adverse impacts to the ability to hunt, fish and trap for food and/or carry out traditional uses including cultural, spiritual or other important sites near the proposed project area. LLRIB encourages Denison Mines to: • reach out to the LLRIB to engage LLRIB members and impacted land users. • support the LLRIB Heritage Fund which enables community members to practice traditional activities • reach out to LLRIB's economic development company, Kitsaki Management, to ensure local and Indigenous involvement	The Lac La Ronge Indian Band ("LLRIB") hosted Denison Mines Corp. ("Denison") at the Lac La Ronge Indian Band ("LLRIB") Traditional Lands & Resources Advisory Committee ("TLRAC") meeting in Missinipe, on August 30, 2023. Denison appreciated the invitation to provide the TLRAC with an update on the Wheeler River Project ("Project"), including responding to the specific concerns raised by LLRIB in its February 9, 2023 letter to the Canadian Nuclear Safety Commission providing comments on Denison's comprehensive Environmental Impact Statement for the Project. As we affirmed during the meeting, the Project is located in the N-18 furblock for registered trappers and is outside the publicly available information regarding the LLRIB Traditionally Occupied Territory. Denison heard the TLRAC's information and perspective shared with us that there are LLRIB land users in the area, irrespective of furblock boundaries, and there remains general concern that land users could be impacted by the Project. As Denison explained during the meeting, we would welcome any specific information about land users in and around the Project area. From the evidence Denison is aware of so far, we are of the view that the outcome of Denison's comprehensive effects assessment in the areas of aquatic and terrestrial environments, and the associated potential impacts to the ability to exercise Indigenous Rights, leads to the conclusion that there will be no significant adverse residual effects to land use activities resulting from the Project. We recognize that this is an evolutionary process, such that if further information arises which indicates a different or more nuanced conclusion, we will review it and consider whether changes to our current direction are appropriate. In accordance with our Indigenous Peoples Policy, 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 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. As mentioned in the meeting, since 2019, Denison has spent more than $1.1M dollars with Kitsaki-owned companies and has intentions to continue this positive trend as much as possible. 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. 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 and the TLRAC feel are important. As noted in your correspondence dated February 9, 2023 we understand that the Heritage Fund is such an initiative, and as such, Denison is pleased to contribute to the Heritage Fund for the amount of $5,000. We trust that this contribution will continue to support and encourage community members to practice traditional activities.

[1] Refers to EIS, unless otherwise noted above

2	Birch Narrows Dene Nation (BNDN) (February 28, 2023)	Section 5.7; 5.8.1	Comment #1: The Project is located within the treaty and ancestral lands of BNDN and maintains both current and historical significance to the community. BNDN Indigenous Knowledge, Land Use and Occupancy are not currently considered within the EIS. Should the Project proceed without the consideration of BNDN's Knowledge, Land Use and Occupancy, it may cause irreparable loss of culturally significant sites and access to resources that the community depends upon. It may also contribute to a loss in cultural transmission. Request/recommendation: a) Denison should provide BNDN with funds to conduct a community-led Indigenous Knowledge, Land Use and Occupancy Study for consideration within the EIS process. At minimum, the Study should consider BNDN's Indigenous Ecological Knowledge, commercial and non-commercial harvesting practices, and cultural occupation of the region (including historical sites). The Study should also consider cultural transmission, information about the history of the area and BNDN community members' perspectives on the Project. b) The community-led Indigenous Knowledge, Land Use and Occupancy Study should be a component of a broader process agreement between BNDN and Denison that serves as a pathway for obtaining BNDN's consent for the Project. c) Denison should work with BNDN to consider the appropriate integration of the results into all aspects of the EIS and management/monitoring plans, as well as any additional appropriate mitigation and/or accommodation measures. See Section 4.1 for additional information on this topic.	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison acknowledges and understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities occurring in and around the Project in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and/or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date. Project effects have been mitigated for the most intensive resource user(s), irrespective of affiliation. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local 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. Therefore, Denison does not anticipate separate funding for BNDN at this time. Further, the assessment has been completed based on Valued Components (VCs), including the VC of Indigenous Land and Resource Use. Key indicators for Indigenous Land and Resource Use include: • resource availability for harvesting subsistence resources (distribution and abundance of animals, plants, and wildlife for harvest and suitability of animals, plants, and wildlife for consumption); • land/water availability to practice traditional land use (TLU); and • perceived suitability of lands and resources therein. Measurable parameters are identified for each of the key indicators, as presented in Table 11.1-1 of the EIS. The assessment does not take a distinctions based approach (i.e., the potential impact on each Indigenous community is not evaluated separately), but rather on the key indicators and associated measurable parameters. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any BNDN uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal. As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible.
3	BNDN (February 28, 2023)	Heritage Baseline Study 2017 (Golder); Heritage Resource Impact Assessment 2020 (Golder); Heritage Resources Management Plan 2022 (Canada North)	Comment #2: Archaeology as a profession has been dominated in North America by non-Indigenous researchers, despite most sites being Indigenous in origin. It is positive that Golder Associates made efforts to engage and involve Indigenous communities (by including an ERFN representative in fieldwork and by considering ERFN and Pinehouse Kineepik Metis land use maps) in their 2017 heritage baseline study and 2020 heritage resource impact assessment. Notwithstanding, the proposed Project area is within BNDN's treaty and ancestral lands and there may be heritage sites that the community is aware of. BNDN was not involved in either of these studies and BNDN may have Indigenous Knowledge of important heritage sites within the Study Area that should be considered. Request/recommendation: a) Denison should provide BNDN with funds to conduct a community-led Indigenous Knowledge, Land Use and Occupancy Study for consideration within the EIS process. b) The Heritage Resources Management Plan should be updated following the consideration	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date. Project effects have been mitigated for the most intensive resource user(s), irrespective of affiliation. Denison continues to work with its Indigenous Communities of Interest with reserves and

			of Indigenous Knowledge, Land Use and Occupancy provided by BNDN. This may result in the requirement for further assessment and/or mitigation measures, which should be developed in consultation with BNDN. c) Denison should facilitate BNDN involvement in any additional archaeological fieldwork that takes place, including providing BNDN with capacity funding for members who participate. Terms to facilitate BNDN involvement in future archaeological work should be a component of a broader process agreement between BNDN and Denison. See Section 4.1 for additional information on this topic (p. 12-14).	residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local 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. Therefore, Denison does not anticipate separate funding for BNDN at this time. Following the implementation of the mitigation measures outlined in the Heritage Resource Management Plan (HRMP), the likelihood of residual effects is considered low and residual effects on Heritage Resources will occur infrequently and can be mitigated with the HRMP. Known archaeological resources identified in the Project Area were deemed to have low potential for archaeological interpretation and additional work or mitigation measures were not required for the sites; the Heritage Conservation Branch had no further concerns with these sites and work could proceed as planned. Should unknown archaeological and cultural resources be identified during the Project, effects will be mitigated using the HRMP. While effects to archaeological resources are irreversible, they can be mitigated by following the HRMP, by either avoiding additional damage to the resource by creating a buffer zone around the site, or by assessing the resource according to The Heritage Property Act to enable the full interpretation of the site before continuing with work. Furthermore, based on the low occurrence of known Heritage Resources in the Project Area (two), and the location of the Heritage Resources (near waterbodies, along an existing trail and away from the main developments), there is a low potential for the identification or disturbance of previously unknown archaeological sites throughout the life of the Project. Therefore, any residual effects (i.e., destruction of Heritage Resources) is considered to be negligible. Further, HRMP includes feedback from Indigenous nations with demonstrated significant land use activities in and around the Project. As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible. Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed.
4	BNDN (February 28, 2023)	Heritage Baseline Study 2017 (Golder) – methods; Heritage Resource Impact Assessment 2020 (Golder) – methods	Comment #3: The methodology within both the 2017 and 2020 heritage studies included 'judgmental' shovel probing and initial troweling through soil to identify cultural heritage material. While the discretion of a professional archaeologist needs to be taken into account, relying subjectively on which areas to shovel test and not employing a systematic approach is not reproduceable and may result in sites being missed; this is of particular concern given that large sections of the areas retaining potential were not subject to shovel testing. Further, troweling through soil rather than subjecting all excavated soil to sifting through 6mm mesh means that artifacts/ecofacts may easily be overlooked. Given that the north of Saskatchewan has not been thoroughly investigated archaeologically, and given that 76 sites and nine find areas were recorded just 35 km south of the Project area as part of Dr. David Meyer's multi-year archaeological investigation, the results of these assessments do not seem rigorous. Request/recommendation: a) BNDN recommends that Denison undertake further archaeological investigations based on the results of the BNDN TKLU study prior to construction of the project. b) Future archaeological assessment programs should be designed collaboratively with BNDN and other Impacted Indigenous Nations. See Section 4.1 for additional information on this topic (p. 12-14).	The 2017 and 2020 heritage studies were reviewed by the Heritage Conservation Branch. The HRIA was completed using standard pedestrian reconnaissance and visual inspection field techniques, complimented by the excavation of shovel probes and shovel tests and it was determined the site has limited interpretive potential. Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfill its key corporate principals for developing positive relationships (see draft EIS Section 4.2). Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local 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. Therefore, Denison does not anticipate separate funding for BNDN at this time. Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed.
5	BNDN (February 28, 2023)	Heritage Baseline Study 2017 (Golder) – methods; Heritage Resource Impact Assessment 2020 (Golder) – methods	Comment #4: The presence of strandlines are noted as being an indicator of archaeological potential; however, it is unclear within the reports whether any strandlines are present within the Study Area. Most of the investigations and shovel probes that took place were around existing waterbodies. Request/recommendation: Please indicate whether strandlines are present anywhere in the Study Area. See Section 4.1 for additional information on this topic (p. 12-14).	Strandlines, like other linear landforms, do increase archaeological potential, however heritage resources are only directly effected by Project activities and there are no strandlines located in the Phoenix Site area (Government of Saskatchewan. N.d. 250K Surficial Geology Linear Landforms. Available at: https://geohub.saskatchewan.ca/datasets/saskatchewan::250k-surficial-geology-linear-landforms/explore?location=57.247957%2C-106.370278%2C6.33 [Accessed November 29, 2023]).
6	BNDN (February 28, 2023)	Heritage Baseline Study 2017 (Golder) – methods; Heritage Resource Impact Assessment 2020 (Golder) – methods	Comment #5: It is unclear whether the locations identified by other Indigenous communities in their Land Use maps were investigated archaeologically and subject where appropriate to shovel testing. Knowing this will give confidence to BNDN that areas they may identify as retaining potential may undergo further assessment if necessary. Request/recommendation: Please indicate whether the areas identified by other Indigenous communities in their Land Use maps were investigated archaeologically. See Section 4.1 for additional information on this topic (p. 12-14).	Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed. Even the most thorough investigations may not identify all archaeological materials that may be present. Denison advises that if unanticipated archaeological materials or features are encountered as a result of construction or reclamation activities, all work in the immediate area should cease and the Heritage Conservation Branch and local authorities (if applicable) contacted.
7	BNDN (February 28, 2023)	Heritage Resources Management Plan 2022 (Canada North) – 4.0	Comment #6: The archaeological context provided is very Western/Scientific. Denison must also include historical/pre-historical accounts of Indigenous communities to provide an appropriate and comprehensive assessment of the archaeological context of the region. Request/recommendation: Denison must include a write-up of Indigenous historical and prehistorical accounts in consultation with relevant Indigenous communities. This write up must include historic context provided through oral history interviews as part of BNDN's community-led Indigenous Knowledge, Land Use and Occupancy Study for the Project. See Section 4.1 for additional information on this topic (p. 12-14).	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date. Project effects have been mitigated for the most intensive resource user(s), irrespective of affiliation. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local 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. Therefore, Denison does not anticipate separate funding for BNDN at this time. Following the implementation of the mitigation measures outlined in the Heritage Resource Management Plan (HRMP), the likelihood of residual effects is considered low and residual effects on Heritage Resources will occur infrequently and can be mitigated with the HRMP. Known archaeological resources identified in the Project Area were deemed to have low

				potential for archaeological interpretation and additional work or mitigation measures were not required for the sites; the Heritage Conservation Branch had no further concerns with these sites and work could proceed as planned. Should unknown archaeological and cultural resources be identified during the Project, effects will be mitigated using the HRMP. While effects to archaeological resources are irreversible, they can be mitigated by following the HRMP, by either avoiding additional damage to the resource by creating a buffer zone around the site, or by assessing the resource according to The Heritage Property Act to enable the full interpretation of the site before continuing with work. Furthermore, based on the low occurrence of known Heritage Resources in the Project Area (two), and the location of the Heritage Resources (near waterbodies, along an existing trail and away from the main developments), there is a low potential for the identification or disturbance of previously unknown archaeological sites throughout the life of the Project. Therefore, any residual effects (i.e., destruction of Heritage Resources) is considered to be negligible. Further, HRMP includes feedback from Indigenous nations with demonstrated significant land use activities in and around the Project. As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible. Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed.
8	BNDN (February 28, 2023)	Heritage Resources Management Plan 2022 (Canada North) – 5.1 1e & 1f	Comment #7: BNDN notes that there has been limited engagement of our Nation as part of the archaeological baseline studies undertaken at the site. The Wheeler River Project is within our Treaty and Ancestral Lands where our members have deep ancestral ties and continue to exercise our rights to this day. As stewards of the land since time immemorial and holders of both Treaty and Aboriginal rights in the Project area, Denison must engage with us as partners on their activities on our lands. This includes their planning and decision-making related to archaeological materials to which our members have ancestral and spiritual ties. Request/recommendation: - Indigenous communities should be consulted and engaged in decision making rather than merely informed if the archaeological material is expected to be Indigenous in origin. See Section 4.1 for additional information on this topic (p. 12-14).	Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed. Even the most thorough investigations may not identify all archaeological materials that may be present. Denison advises that if unanticipated archaeological materials or features are encountered as a result of construction or reclamation activities, all work in the immediate area should cease and the Heritage Conservation Branch and local authorities (if applicable) contacted.
9	BNDN (February 28, 2023)	Heritage Resources Management Plan 2022 (Canada North) – 5.1 7	Comment #8: Given the Ancestral and Treaty ties our members have to the project area, our members have valuable knowledge and context to inform the Heritage Resource Impact Assessment (HRIA) for the Project that must be considered prior to being reviewed or approved by any regulatory body. Request/recommendation: - The draft HRIA should be reviewed by BNDN and other impacted Indigenous Nations prior to being submitted for regulatory approval. See Section 4.1 for additional information on this topic (p. 12-14).	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date. Project effects have been mitigated for the most intensive resource user(s), irrespective of affiliation. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local 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. Therefore, Denison does not anticipate separate funding for BNDN at this time. Following the implementation of the mitigation measures outlined in the Heritage Resource Management Plan (HRMP), the likelihood of residual effects is considered low and residual effects on Heritage Resources will occur infrequently and can be mitigated with the HRMP. Known archaeological resources identified in the Project Area were deemed to have low potential for archaeological interpretation and additional work or mitigation measures were not required for the sites; the Heritage Conservation Branch had no further concerns with these sites and work could proceed as planned. Should unknown archaeological and cultural resources be identified during the Project, effects will be mitigated using the HRMP. While effects to archaeological resources are irreversible, they can be mitigated by following the HRMP, by either avoiding additional damage to the resource by creating a buffer zone around the site, or by assessing the resource according to The Heritage Property Act to enable the full interpretation of the site before continuing with work. Furthermore, based on the low occurrence of known Heritage Resources in the Project Area (two), and the location of the Heritage Resources (near waterbodies, along an existing trail and away from the main developments), there is a low potential for the identification or disturbance of previously unknown archaeological sites throughout the life of the Project. Therefore, any residual effects (i.e., destruction of Heritage Resources) is considered to be negligible. Further, HRMP includes feedback from Indigenous nations with demonstrated significant land use activities in and around the Project. As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible. Please see Section 11.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment for Heritage Resources. The Section describes how field assistants from local Indigenous communities were involved with the HRIA baseline studies, allowing for in-field consultation during the assessment to make sure that areas deemed to have potential by the land users were surveyed.
10	BNDN (February 28, 2023)	Heritage Resources Management Plan 2022 (Canada North) – 5.1 1	Comment #9: Discerning archaeological artifacts/ecofacts is difficult at times even to the trained eye; consequently, it is important to undergo training to understand what you could be looking for. Request/recommendation: a) Staff should undergo training regarding the cultural material they may encounter while on site b) BNDN and other Indigenous communities should be invited to attend this training See Section 4.1 for additional information on this topic (p. 12-14).	Section 5.1.1 describes how all staff working on the Project should be informed of the possibility that they could encounter archaeological resources during their work or leisure time, which will include the proper procedure to follow in the case of a chance find. This could be facilitated by a short archaeological education section in the employee orientation, outlining the types of sites and artifacts that could be encountered in the area, as well as what to do when a potential artifact or site is found. If the chance find is deemed to be an archaeological site, then an HRIA is required and a qualified archaeologist must complete the assessment. Section 11.3.5 Mitigation Measures describes the management of archaeological resources and 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 and implementation of appropriate cultural protocols.
11	BNDN (February 28, 2023)	Heritage Resources Management Plan 2022 (Canada North) – 5.3	Comment #10: In numerous instances the Heritage Resources Management Plan (HRMP), Denison has used noncommittal language to describe future Indigenous engagement related to heritage resources. BNDN notes that engagement of impacted Nations is essential for proper heritage resource management and as such the language in the HRMP should reflect the necessity of this engagement. Request/recommendation: - Throughout the HRMP, Denison must change the language of "should" to "will" where appropriate. For example: management options will be presented to the applicable Indigenous communities for feedback and will include consultation. See Section 4.1 for additional information on this topic (p. 12-14).	The Heritage Resources Management Plan will be revisited for use of language 'should' to 'will' where appropriate.

12	BNDN (February 28, 2023)	Heritage Resources Management Plan 2022 (Canada North) – 5.3.1	Comment #11: BNDN notes that Section 5.3.1 does not confirm that impacted Indigenous Nations will have the opportunity to participate in future archaeological fieldwork. While BNDN understands that many impacted Nations will have arrangements directly with Denison to facilitate member participation, this should additionally be made available to all impacted Indigenous Nations as part of best practices at the Project. Request/recommendation: - In addition to any provisions developed in a Project Agreement between BNDN and Denison for the Wheeler River Project, Denison should include a clause that confirms that all impacted Indigenous communities will be invited to have monitors participate in any additional fieldwork and that Denison will provide capacity funding for Nations that wish to participate. See Section 4.1 for additional information on this topic (p. 12-14).	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
13	BNDN (February 28, 2023)	Section 13.0	Comments #12, 14 and 15: BNDN is not included as a Local Study Area (LSA) Community despite being closer to the Project than other LSA Communities. The Project is situated on BNDN's ancestral lands. BNDN members currently and historically use the LSA for harvesting (commercial and personal) and ceremonial purposes. Without the LSA Community designation, BNDN members are less likely to be employed or trained through the Project. BNDN members are not entitled to priority training and employment provisions from Denison on the Project. Further, BNDN businesses and partnerships are not entitled to priority procurement provisions from Denison on the Project. Request/recommendation: - BNDN must be identified as a LSA Community. BNDN members and businesses must be eligible for LSA priority status for employment, training, and contracting opportunities. The EIS should be revised accordingly. - A formal agreement between BNDN and Denison is required to outline socioeconomic offsetting measures and benefits should the Project move forward. This must include ways for BNDN businesses and member owned businesses to participate in the Project. Denison references a Human Resource Development Plan (HRDP) as a mitigation measure to ensure local and regional community members are hired in priority. However, Denison does not provide sufficient details to allow Birch to assess the adequacy of the HRDP. Request/recommendation: - BNDN requests the ability to review and comment on Denison's Human Resource Development Plan to provide input and recommendations to encourage community participation and employment in the Project. See Section 4.2 for additional information on this topic (p. 19-23).	Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the Communities of Interest ("COI"). Economic benefits surrounding Project employment (including income and training) are likely to be targeted toward the communities identified within the spatial boundaries. Economic impacts extending beyond the LSA are likely to be diffused and undetectable within the broader economy. The spatial boundaries were selected based on the consideration of communities where Project recruitment is likely to be prioritized, consideration of previous EAs conducted in the region, and consideration of information shared through key persons in the interview program. The LSA for the assessment of the economy includes the following communities: ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village. Denison, through a Human Resource Development Plan, will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities (anticipated to be in institutions in northern Saskatchewan) and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, which could include such items as on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs. Priority for employment and training will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA.

14	BNDN (February 28, 2023)	Section 12.0 and 13.0	Comment #13: There is no BNDN specific Indigenous Knowledge or socioeconomic data presented in the EIS. Request/recommendation: - Denison must conduct Indigenous Knowledge and Community well-being Study (or similar) to gather BNDN specific information. These studies will allow for a more fulsome assessment of the Project on BNDN rights and interests. Additionally, BNDN specific data will enhance Denison's baseline data and help to inform mitigation and monitoring measures. See Section 4.2 for additional information on this topic (p. 19-22).	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. However, Denison understands this information from BNDN. As such, over the past year(s), Denison has met with BNDN and has respectfully requested further information from BNDN in respect to the land use activities to occurring in and around the Project, in order to more meaningfully understand the potential for adverse impacts to BNDN and therefore consider the potential for further studies and / or integration into the EIS of such information. Denison remains of the perspective that receipt of this information from BNDN is a necessary first step in this process, and has not received information in this regard to date. Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Economic benefits surrounding Project employment (including income and training) are likely to be targeted toward the communities identified within the spatial boundaries. Economic impacts extending beyond the LSA are likely to be diffused and undetectable within the broader economy. The spatial boundaries were selected based on the consideration of communities where Project recruitment is likely to be prioritized, consideration of previous EAs conducted in the region, and consideration of information shared through key persons in the interview program. The LSA for the assessment of the economy includes the following communities: ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village. The spatial boundaries selected for Community Well-being were chosen because they permit baseline characterization in sufficient detail to enable potential interactions between the Project and the well-being of the community. These boundaries were developed in consideration of where interactions are likely to occur. The spatial boundaries were derived based on the consideration of communities where Project recruitment is likely to be prioritized, consideration of previous EAs conducted in the region, and consideration of information shared through key persons in the interview program. The LSA for the Community Well-being VC includes ERFN (including Indian Reserves Wapachewunak 192D and La Plonge 192) and Patuanak, Northern Hamlet; Pinehouse Lake, Northern Village; and Beauval, Northern Village.
15	BNDN (February 28, 2023)	Section 12.0	Comment #16: While EIS does consider the effects of population changes related to the Project on social adaptability, demand for services and housing, it does not address the full range of potential impacts associated with a transient workforce. Significant research has been conducted to demonstrate the negative impacts of remote workers and work camps on Indigenous women and girls. This must be considered in the EIS. The EIS must include an assessment of all potential effects of a transient workforce and changes to population dynamics, including those disproportionately experienced by Indigenous women and girls, and other segments of the population. This must incorporate findings of research like the 2017 study completed by Lake Babine Nation and Nak'azdli Whut'en (Indigenous Communities and Industrial Camps), and/or related research in the context of the LSA. See Section 4.2 for additional information on this topic (p. 19-21).	Both the construction and operation camps will operate on a fly-in/out basis, meaning the opportunities for interactions between the workforce and Indigenous communities are limited as workers will be transported by air directly to the site. Section 12.2.4.2.1 provides the actions to minimize the extent the Project contributes to in- and out- migration in the LSA, including: • Denison will initially prioritize the COI in terms of employment opportunities and will work with the leadership of these communities to assist in determining hiring practices during all phases of the Project. Priority for hiring will then focus on Indigenous and non-Indigenous residents of the RSA and then beyond the RSA. • Employees will not be permitted to commute to the site by any means other than the fly-in/fly-out worker rotation systems (i.e., they cannot drive to the site). • Pick-up and drop-off points are being planned at two locally central points in communities within the LSA, at one additional site in Saskatchewan (i.e., Saskatoon), and potentially at other locations. • Housing for workers will be provided at the camps with free accommodations and meals. Although difficult to predict, communities in the LSA are not expected to experience any substantial population growth or change in demographics as a result of the Project, particularly with mitigation measures identified. Although the potential exists for some individuals to return to the COI, it is anticipated that this would be difficult to discern from existing in-/out-migration rates. As population and demographics are not expected to experience any change as a result of the Project, this pathway will not be carried forward to the residual effects assessment.

16	BNDN (February 28, 2023)	Section 12.0 and 13.0	Comment #17: BNDN notes that no specific management or monitoring plan has been included in the EIS documentation related to the verification of residual socio-economic impacts, both positive and negative, for the local economy. Request/recommendation: a) Denison must develop a Socio-Economic Monitoring Plan for the life of the Project to verify the effects assessment included in the EIS and to be included in the Project's approach to adaptive management. This Plan would include an approach, co- developed with Indigenous groups in the LSA (including BNDN), to monitoring the realization of the benefits and impacts of the Project (e.g., employment and procurement targets, training and capacity building, community investments, etc.) as mitigation and enhancement measures are implemented. Monitoring and subsequent regular evaluation would allow for the real-time adjustment of targets and/or an approach to adjusting enhancement measures or identifying offsetting benefits where targets are not met. See Section 4.2 for additional information on this topic (p. 19-21). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
17	BNDN (February 28, 2023)	Section 12.0 and 13.0	Comment #17: BNDN notes that no specific management or monitoring plan has been included in the EIS documentation related to the verification of residual socio-economic impacts, both positive and negative, for the local economy. Request/recommendation: b) The Crown must include the development of a Socio-Economic Monitoring Plan as a condition of approval for the Project. See Section 4.2 for additional information on this topic (p. 19-21). [Additional questions on this topic directed to the proponent are included in the CNSC table]	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
18	BNDN (February 28, 2023)	Appendix 9B Section 2.5.1 Appendix 8E Table 4	Comment #18: In several instances in the draft EIS Denison has noted that Indigenous Nations are concerned with the possibility of mercury contamination from mining operations. BNDN shares these concerns with other Indigenous Nations. Due to the very low concentrations of mercury present in the Phoenix deposit, Denison has not meaningfully studied the potential impacts the Project may have on altering mercury biogeochemistry in the downstream environment. BNDN notes that background mercury concentrations can be elevated in many unexpected and remote locations due to atmospheric deposition (often due to coal plants) (Jackson, 1997). BNDN is very concerned that Denison has not analyzed for mercury as part of their baseline soil geochemistry assessments for the Project, especially in wetlands downstream of the Project. Mercury concentrations in wetland soils are sensitive to changes in water chemistry that can	Although baseline concentrations of total mercury in sediment were not collected during the baseline program, Denison will collect background information pertaining to sediment total and methyl mercury from LSA lakes and rivers prior to site development. As indicated in draft 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; 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

			lead to increased mercury methylation. This is especially acute from increases in nutrients and sulphates which can active sulfate reducing microorganisms that methylate mercury (Liu, Li, & Cai, 2012). Table 4 of Appendix 8e shows that the effluent discharged to Whitefish Lake will have mercury concentrations almost 5,700 times background concentrations. This dramatic increase in sulfate loading to Whitefish Lake may not exceed water quality objectives unto itself but may be sufficient to meaningfully change mercury biogeochemistry in downstream wetlands. BNDN is very concerned with the complete lack of assessment and analysis of baseline mercury concentrations and the potential changes to mercury cycling that could be induced by the Project. Request/recommendation: a) BNDN requests that Denison undertake baseline studies of mercury concentrations in soils, with a focus on baseline concentrations of mercury in organic wetland soils downstream of the project. Note that mercury sampling should sample total mercury and methylmercury in all analyses, as well as porewater total mercury and methylmercury. The study design and implementation should be undertaken collaboratively with BNDN. b) BNDN recommends that the CNSC requires Denison to undertake a baseline assessment of mercury in soils (with a focus on wetlands) prior to construction of the Project. This may be established as a condition of approval for the Project. c) Depending on the findings of the baseline mercury in soils and wetlands studies, the CNSC should include a condition of approval on the Project that requires Denison to monitor mercury biogeochemistry in the receiving environment over the life of mine. See Section 4.3 for additional information on this topic (p. 25-28). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	changes in mercury concentrations in fish tissue over time. 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. Mercury data presented throughout the draft EIS represents total mercury. Denison agrees to include methylmercury as part of the constituents monitored in fish throughout all project phases. Engagement on licensing requirements, such as the development of the environmental monitoring program and the associated monitoring regime will occur to support Project permitting and licensing efforts. 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 applicable human health risk-based maximum permissible concentrations.
19	BNDN (February 28, 2023)	Appendix 7C Section 3.5.6.2.1 Figures 7.6-10 and 7.6-11	Comment #19: Figure 7.6-10 and 7.6-11 of the draft EIS show the results of Denison's modelling of uranium mobility and adsorption from the ore body following the decommissioning of the mine. The figures show that the model indicates that all dissolved uranium will be effectively removed from solution within a short distance of the orebody via adsorption to clays present in the bedrock. In Section 3.5.6.2.1 of Appendix 7c of the draft EIS Denison notes that there is very limited literature available on uranium fate and transport, especially in similar environments to the Wheeler River Project. Denison's uranium speciation model relies almost entirely on a single academic article studying the partitioning of uranium in the alteration halo surrounding the Cigar Lake uranium deposit. Of very important note is that this paper is focused on the pre-mining environment at Cigar Lake and does not examine how uranium partitioning may be dramatically altered by ISR mining. Health Canada published a document on uranium in drinking water in 2017 literature review of uranium mobility, complexation and chemistry in groundwater which documents the widely varying behaviour of uranium in groundwater depending on redox conditions, pH, pressure, and other ions available for complexation which may increase or decrease uranium mobility (Health Canada, 2017). Uranium will be present in extremely high concentrations (100 mg/l) in the restoration solution. Many other anions and cations which uranium is known to form complexes with will also be present in the solution at very high concentrations. The limited literature upon which Denison has developed their models to predict uranium mobility post- decommissioning is insufficient to confidently assert that the very concentrated restoration solution will behave as predicted. Uranium is a common groundwater contaminant around the world and is known to be stable in dissolved forms in groundwater in many locations. Furthermore, some studies have indicated that the effectiveness of adsorption as a mechanism for attenuation of uranium in solution is significantly overstated, especially in environments where there is competition from other ions, as there will be in the restoration solution (Gandhi, Sampath, & Maliyekkal, 2022). BNDN is very concerned that Denison has portrayed their groundwater contamination model in Appendix 7c with an inappropriate level of confidence given the level of uncertainty reasonably inferred from the lack of foundational literature relevant to the circumstances at Wheeler River and the well- understood complexity of uranium fate and transport in groundwater. It is not impossible to imagine that surface water contamination could eventually occur, especially given the exceptionally high concentrations of uranium in the restoration solution. By consenting to the Wheeler River Project, BNDN is supporting a process that will be irreversible	Denison's engagement with BNDN is consistent with the identification of BNDN as an Indigenous Community who has expressed an interest in the Project. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation (ERFN) and Kineepik Métis Local (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. As such, Denison will not be developing a process agreement with the BNDN to address concerns raised about pertaining to long-term groundwater quality for the Wheeler River Project. This comment is also applicable to other comments where the same request was made by the BNDN. The balance of this response pertains to groundwater quality and the numerical groundwater model presented in draft EIS will focus on the technical content of the concerns raised. Denison's groundwater SME and author of the modelling report (Appendix 7C) acknowledges that the modelling report did not include a lengthy discussion of uranium speciation and mobility. However, the reactive transport modelling done using the PHREEC geochemical code was carefully informed by relevant literature, and was certainly not restricted to consideration of one study (Cigar Lake). In Section 3.5.3 of Appendix 7C we reference important studies pertaining to uranium complexation in solution by carbonate species (Guillaumont et al. 2003; Gorman-Lewis et al., 2008; Grenthe et al., 2020) and ternary complexes of uranium with calcium and magnesium and carbonates in solution (Dong and Brooks, 2006). These complexation reactions were added into the Project-specific PHREEQC database developed as part of the work presented in Appendix 7C. The database was updated to include solution-phase complexes of uranium in Guillaumont, 2003, which is a comprehensive summary of known reaction constants for uranium with dissolved-phase ligands. Further, the consideration of sorption of uranium-carbonate complexes to quartz, geothite and illite is shown in Appendix E of Appendix 7C, and relies on information from multiple publications. The reactive transport modelling was done using piChem (FELOW + PHREEQC) because of the ability of that approach to carefully consider speciation of uranium, and the potential interactions of uranium with other species in solution.

			once it commences and may be very difficult to manage should the underlying modeling assumption prove to be inaccurate by a significant margin. As a Nation whose members put a very high emphasis on the protection of groundwater resources, BNDN requires substantially greater reassurance through dialogue with Denison and further studies to have confidence that the Project will not irreparably degrade the natural environment in our Ancestral Lands. Request/recommendation: - Denison must develop a process agreement with BNDN to work through our concerns related to long-term groundwater contamination from the Project. This process agreement would lay out the pathway to obtaining BNDN consent for the Project through providing our Nation with confidence that the groundwater and surface water near to the project will not be irreparably contaminated. The process agreement will include additional studies and consultation activities with BNDN that Denison must undertake. The satisfaction of all terms in the process agreement would be defined by the signing of a Project Agreement between Denison and BNDN. - BNDN recommends that Denison commit to funding bench-scale studies to validate the outputs from their FEFLOW and PHREEQC modelling. The bench-scale studies should be undertaken by an independent academic. See Section 4.3 for additional information on this topic (p. 25-28).	The comment to which the BNDN refer in Section 3.5.6.2.1 of Appendix 7C is: "[t]o the best of our knowledge, there is very little information published about the solid-phase speciation of uranium and other constituents associated with ore bodies and the overlying and underlying rocks in the Athabasca basin". This is not speaking specifically to the speciation of uranium in the solid phase. Experimental work that provide information on solid-phase speciation include sequential extraction schemes and spectroscopic studies, such as recent work by Bayle et al., 2023 (https://pubmed.ncbi.nlm.nih.gov/37417589/). Research on the solid-phase speciation of uranium is not addressed in Health Canada (2017). As indicated, we were not able to find research pertaining to sequential extractions of spectroscopic studies of uranium in the solid phase for relevant materials/conditions. It is for this reason that we presented results of solid-phase uranium speciation in the available study by Percival 1989. It is acknowledged that this study was for Cigar Lake. The relevance of the work for the Wheeler River Project is high.
20	BNDN (February 28, 2023)	Section 7.6.2.1 Appendix 7C Section 4.6	Comment #20: In Section 7.6.2.1 of the draft EIS, Denison mentions that they anticipate the outward migration of lixiviant as is observed at other ISR operations globally, and has incorporated their assumed concentrations of metals and the extent of area affected by flare from the ISR operations. Section 4.6 of Appendix 7c states that the flare zone is expected to extend 11 to 13 m but have modelled with a “conservative 50 m flare zone. It is not clear how Denison derived their assessment that the flare zone would extend 11 to 13 m and that a 50 m flare zone is considered conservative for the purposes of modelling. BNDN requires further information to have confidence that the design is as conservative as the Proponent has suggested. Request/recommendation: - BNDN requests that Denison provide further information on how the size of the area above the deposit affected by flare was calculated and how they determined that 50% restoration solution was determined as the appropriate concentration to base water quality modelling. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN’s concerns related to long term groundwater contamination from the Project. See Section 4.3 for additional information on this topic (p. 25-28).	Groundwater modelling and flow path analysis calibrated to field conditions have evaluated upward solution migration and demonstrated that the maximum height that injected fluids will migrate upwards from the ore zone during active mining is likely between 11 to 13 m (Section 2 of the draft EIS). For conservatism, a 50-m vertical zone above the deposit was assumed to be potentially disturbed by mining activities. Denison specified 50m flare threshold based on their commitment to maintain inward hydraulic gradients, and or adding extraction wells as necessary to limit the migration of the flare. With the engineered controls described above, flare is not anticipated above 11-13 m. However, the decision was made to assume 50% of the restored solution uniformly between 15 and 50 m above the mineralized zone because there will be a natural gradient from 100% restored solution to 0% restored solution (i.e., baseline conditions) over this distance. The uncertainty associated with this decision was addressed in the uncertainty analysis presented in Section 4.7 of Appendix 7C, where 100% restored solution was assumed to be present over the entire 50 m height above the ore zone. The results of the model under both scenarios was consistent: no water quality effects above groundwater screening criteria, apart from those that reflect natural conditions, in Whitefish Lake. Over the life of the Project, groundwater quantity and quality monitoring activities will be completed to assess the performance of various components of the Project associated with engineering mining designs and performance and infrastructure designs to protect groundwater. A detailed Groundwater Monitoring Plan (GWMP) will be prepared to support licensing. The GWMP will include an Excursion Contingency Plan, and measures for adaptive management. The GWMP will be informed by the 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 the commitments made within the Geology and Groundwater section of the EIS. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.

21	BNDN (February 28, 2023)	Appendix 7C Section 3.2.2.1	Comment #21: Section 3.2.2.1 of Appendix 7C of the draft EIS describes the natural redox conditions in the ore zone as naturally reducing. The operation of the wellfield will result in the groundwater in the ore zone becoming oxidizing. Post decommissioning, the groundwater in the ore zone can be reasonably anticipated to return to baseline (reducing) redox conditions. BNDN notes that as redox conditions becoming increasingly reducing post closure, adsorption kinetics of contaminants adsorbed to clays could shift so that contaminants desorb from clays and are remobilized into solution. It is not clear to BNDN that the evolution of redox geochemistry and its implication on adsorption kinetics has been adequately considered by Denison. Request/recommendation: - BNDN requests further information on how increasingly reducing groundwater conditions post decommissioning may impact adsorption kinetics of contaminants expected to adsorb to clays. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN's concerns related to long term groundwater contamination from the Project. See Section 4.3 for additional information on this topic (p. 25-28).	Solution-phase concentrations of metals and uranium are what influence the desorption of these elements from clays over time; but the BNDN is correct that there may be hysteresis, or a kinetic component to desorption to equilibrium conditions. Re-establishment of reducing redox conditions - primarily through scavenging of residual oxidant with pyrite - with progressive movement of natural groundwater through the mining area in the Decommissioning period is anticipated to result in concentrations of metals and uranium at baseline conditions because the same mineral phases as are present now are expected to control the solubility of those elements. Secondary minerals may influence concentrations for a small number of constituents. In all cases. concentrations of these elements will not exceed those assumed in the model. In the model as presented, desorption from clays was taken into account for protons that had sorbed to chlorite in the mining area as a sensitivity analysis. The desorption of protons did not have an adverse effect on the water quality in Whitefish Lake. See draft EIS Appendix 7-C Sections 3.5.6.4 and 4.7. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.
22	BNDN (February 28, 2023)	Appendix 7C Section 3.4	Comment #22: In Section 3.4 of Appendix 7C Denison reports that they have excluded colloids from their post- decommissioning geochemical modelling. Denison has also noted that colloids would serve to enhance mobility of contaminants and they could precipitate out of solution. BNDN is concerned that by excluding the precipitation of colloids with adsorbed contaminants as a pathway for contaminant transport, Denison has significantly underestimated the mobility of contaminants and the consequent risks to the receiving environment. Request/recommendation: - BNDN requests that Denison prepare an additional geochemical model that considers the roles that colloids could potentially contribute to contaminant transport. The findings of this additional model (along with the other models) should be reviewed with BNDN. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN's concerns related to long term groundwater contamination from the Project. See Section 4.3 for additional information on this topic (p. 25-28).	The authors acknowledged in Appendix 7C the potential for transport of COPCs in association with colloids was possible, and used previous research in a highly relevant system (Cigar Lake) to make the professional judgement that this process would not significantly alter the results of the numerical model. Colloid transport is not included routinely in reactive transport modelling because of the difficulty in a) accurately measuring the colloidal fraction in groundwater under existing conditions as the basis for the numerous assumptions that would need to made to include them in numerical modelling and b) the challenges with applying modelling approaches that have been developed at the scale of regional models (e.g., Molnar et al., https://www.pure.ed.ac.uk/ws/portalfiles/portal/109261315/109261203._Molnar._PFV.pdf). Refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.
23	BNDN (February 28, 2023)	Appendix 7C Section 4.0	Comment #23: In Section 4.0 of Appendix 7c of the draft EIS, Denison reports that the composition of restoration solution 1 and restoration solution 2 were derived from metallurgical testing. While this is likely the best, BNDN notes that the initial solution used in the geochemical modelling is enormously consequential in the accuracy of the modelling and require further confirmation and confidence that the restoration solutions are accurate to within a reasonable margin of error for the geochemical modelling. Request/recommendation: - BNDN requests that Denison provide further information on how the chemistry in restoration solution 1 and restoration solution 2 were derived and any evidence they can provide that gives them confidence that these solutions are an accurate reflection of what will be observed in the wellfield. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN's concerns related to long term groundwater contamination from the Project. See Section 4.3 for additional information on this topic (p. 25-28).	Further information on how the chemistry in restoration solutions #1 and #2 were derived and evidence providing confidence that the reflect conditions that are expected in the mining area with remediation of the mining area is provided in the Denison Feasibility Report (2023) and a summary is attached as part of Denison's response to Federal Indigenous Review Team (FIRT) information requirement #67. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.

24	BNDN (February 28, 2023)	Appendix 7C	Comment #24: BNDN notes that Denison has not provided any discussion on the extent to which the lixiviant and the solution used to flush the wellfield at the end of operations will interact with the underlying paleo weathered bedrock. BNDN notes that is it possible that there are mineral phases within the paleo weathered bedrock that are also readily soluble when exposed to the lixiviant. While BNDN recognizes that the paleo weathered bedrock has a low permeability, it is unclear to BNDN as to whether the lixiviant will contribute to mobilization of contaminants from the paleo weathered bedrock that requires consideration in the post-decommissioning groundwater model. Request/recommendation: - BNDN requests that Denison provide any available information on how the bedrock may be altered (through dissolution of soluble mineral phases) by the lixiviant and the flushing of the wellfield during decommissioning, and whether this has been factored into their post-decommissioning groundwater model. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN's concerns related to long term groundwater contamination from the Project. See Section 4.3 for additional information on this topic (p. 25-28).	In the modelling presented in Appendix 7-C, the mining area is assumed to span the entirety of the depth of the paleoweathered zone within the area of the freeze wall, as described in Section 4.6. Thus, in the Decommissioning period, the water quality in that entire portion of the paleoweathered zone was assumed to be equivalent to that of the "restored solution". This reflects, as the BNDN notes, the dissolution of soluble minerals associated with the paleoweathered zone due to interaction with the mining solutions. This assumption is conservative because the whole of the paleoweathered zone does not have the uranium mineralization of the ore zone, nor the concentrations of other COPC-containing mineral phases. Some alteration of the clays is expected, as is some bleaching (loss of iron-rich minerals); however, there is uncertainty with respect to the specific changes in the nature of the paleoweathered zone that have continued to be explored by Denison through experimental/metallurgical work. The decision was made in the numeric modelling to treat the portion of the paleoweathered zone within the freeze as geochemically unreactive - meaning that no sorption to clays or desorption from clays (with the exception of chlorite in the "pH tail" scenario (Section 3.5.6.4) was assumed for this zone. Thus, sorption of COPCs to clays in the paleoweathered zone within the numeric model occurred only outside of the freeze wall footprint, where the minerals will not have been exposed to mining solutions and will not have been altered. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.
25	BNDN (February 28, 2023)	Appendix 7C Section 5.2.2	Comment #25: In section 5.2.2 of Appendix 7c of the draft EIS Denison reports the assumptions built into their post- decommissioning groundwater modelling. BNDN notes that Denison has assumed that adsorption reaction sites are assumed to be available uniformly throughout the subsurface parameter zones. The presence of sufficient adsorption sites is a primary variable which determines the outcomes of the groundwater modelling, as adsorption of ions out of solution is the primary means by which contaminant transport is attenuated in Denison's modelling. BNDN is concerned that the presence of a variable that is so consequential to the findings of the model is based primarily on assumptions with limited information to base the assumptions upon. Request/recommendation: - BNDN requests that Denison provide justification for the assumption that adsorption sites will be uniformly available throughout the sub-surface parameter zones. BNDN requests that Denison provide information on how they estimated the extent to which adsorption sites are already saturated prior to mining. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN's concerns related to long term groundwater contamination from the Project. See Section 4.3 for additional information on this topic (p. 25-28).	We note the uncertainty assessment in the draft EIS tests conditions where less sorption sites are available (1/10th of the characterized amount). Further, refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances. Denison is committed to continue to engage with Indigenous Nations and communities to solicit input. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.
26	BNDN (February 28, 2023)	Appendix 7C Table 3-10	Comment #26: Table 3-10 of Appendix 7c of the draft EIS shows the expected adsorbing mineral properties of the mineral phases to which contaminants are expected to adsorb out of solution. BNDN notes that the lixiviant and restoration solution could affect the ability of adsorption. In particular, the clays immediately surrounding the orebody are within the freeze wall and will be directly exposed to the lixiviant during operations, which may impact the clays ability to adsorb contaminants out of solution. BNDN notes that the clays immediately surrounding the orebody may be soluble in the presence of the lixiviant or may be altered to have a lower capacity to adsorb metals. BNDN requires further information from Denison to have confidence that the clay phases which play a crucial role in contaminant attenuation will not have their adsorptive capacity impacted by the operation of the wellfield. Request/recommendation: - BNDN requests that Denison provide available information on whether clay mineral phases are anticipated to dissolve through the ISR mining process, and whether the restoration solution will impact the ability of clays to effectively adsorb contaminants. This item would be best addressed and resolved with BNDN through the process agreement to address BNDN's concerns related to long term groundwater contamination from the Project. See Section 4.3 for additional information on this topic (p. 25-28).	Please see Denison's response above to BNDN Comment #24. Sorbing phases including clays were excluded from the mining area in the numeric model. Sorption occurs only to materials outside of the mining area that are not exposed to, and thus no altered by interaction with the mining solutions. Please refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.

27	BNDN (February 28, 2023)	Section 1.1.1	Comment #26: In Section 1.1.1 of the Draft EIS, Denison notes that "the Gryphon deposit is not amenable to ISR mining and, accordingly, is not included in the EIS". Denison has previously reported that the Gryphon deposit has nearly as much uranium as the Phoenix deposit. While the Gryphon deposit is not amenable to ISR, it is potentially still an economic resource which Denison may wish to mine. While the Gryphon deposit is not in scope for this environmental assessment, BNDN expects to be kept informed of future potential mining activities on the Wheeler River Project which Denison may be considering, including additional exploration on the Property, as future activities on the Property will also have impacts on our Treaty and aboriginal rights and interests. Request/recommendation: - Given the potential longer term mining activities at the Wheeler River project beyond the Phoenix deposit, BNDN requests that any project agreement between BNDN and Denison include terms for ongoing dialogue related to future exploration and project development activities at the Wheeler River Project and at all Denison Projects on BNDN Ancestral Lands. See Section 4.3 for additional information on this topic (p. 25-28).	Denison acknowledges that, if development of the Gryphon deposit as an underground mine is proposed in the future, this would require additional regulatory review and approval as well as engagement with Indigenous Communities of Interest. Please also refer to the first part of Denison's response to BNDN comment #19 in regard to BNDN's suggestion of a process agreement.
28	BNDN (February 28, 2023)	Section 2.3.3.1.3	Comment #28: In Section 2.3.3.1.3 of the draft EIS Denison describes the proposed decontamination, demolition and disposal activities at the Project. BNDN notes that Denison has described a detailed process for decommissioning the injection and recovery wells but has not described how the freeze wells will be decommissioned. BNDN notes that the freeze well holes may serve as preferential pathways for contaminated groundwater movement. Given the proximity of freeze wells to the orebody and the number of freeze wells proposed to be drilled, proper closure of freeze wells is also important for protection water quality long term. Request/recommendation: a) BNDN request that Denison clarify the process by which they will decommission the freeze wells. b) BNDN requests that Denison decommission the freeze wells using the same process as is proposed for the decommissioning of the injection and recovery wells. See Section 4.3 for additional information on this topic (p. 25-28).	The freeze holes will be decommissioned in the same manner as the ISR wellfield injection and recovery wells. All wells once decommissioned will undergo a mechanical integrity and leak off test prior to being grouted and sealed internally preventing interaction of surface water from the underlying aquifer at the mineralized depth. The freeze pipes, which will be located inside the freeze holes, will simply be unthreaded and removed from site after the freeze wall is no longer required.
29	BNDN (February 28, 2023)	Section 2.3.3.1.3	Comment #29: Denison describes the thawing of the freeze wall as part of the decommissioning of the mine. BNDN notes that water expands when frozen and could potentially be capable of expanding pre-existing joints and fractures within the host rock. BNDN is concerned that the thawing of the freeze wall could lead to expanded joints and fractures which would allow for far more rapid contaminant transport away from the ore body and restoration solution than is modelled in the post-decommissioning groundwater model. Request/recommendation: - BNDN request that Denison provide evidence from academic literature or other mine sites employing freeze wall technology to determine the extent the freeze wall could expands joints and fractures within the rock once thawed, including at unconformities or other pre-existing structural weaknesses within the host rock. See Section 4.3 for additional information on this topic (p. 25-28).	Please refer to the Attachment to IR-10 for information on the freeze wall integrity and basis for the design, which relies on site field data and lived experience from several existing Saskatchewan mining operations.
30	BNDN (February 28, 2023)	Figure 2.2-15 Section 2.2.3	Comment #30: Denison notes that they have made the conservative assumption that no water would be recycled as mining solution as part of their water balance calculations. BNDN agrees that this conservative assumption is appropriate for assessment of potential impacts of the Project. While this assumption is appropriate for the environmental assessment, BNDN wishes to understand the proportion of industrial wastewater that may be recycled on site and any commitments Denison is willing to make regarding continual refinement of the water treatment process to increase the proportion of water that is recycled. Request/recommendation: a) BNDN requests that Denison commit to continual refinement of the Industrial Waste Water Treatment Plant (IWWTP) treatment process to maximize the amount of water that is recycled to the deposit. b) BNDN recommends that the Crown include a condition of approval for the project regarding continual improvement of water treatment to maximize recycling. c) BNDN requests that Denison share available information on the proportion of water that they currently anticipate being able to recycle. See Section 4.3 for additional information on this topic (p. 25-28). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	The EIS carried forward two options for the source of freshwater: 1) surface water and 2) groundwater. This freshwater will meet all Project needs for potable water, drilling, and process water and allow Denison to obtain the water from groundwater wells or from the surface water (Whitefish lake). The effluent quality and volume predictions in the EIS provide a bounding scenario of the basis of the assessment of Project effects. Denison is undertaking a sequential EA and licensing process under the Nuclear Safety and Control Act. For context, the EA process for a Project under CEAA 2012 and the Saskatchewan Environmental Assessment Act is long and complex. As such, the inputs and outputs (including IWWTP water recycle volumes and effluent quality) developed for the IWWTP were necessary and determined by Denison's Project engineers early in the EA process to allow for the EIS biophysical and human assessments to advance. Detailed design information on the IWWTP, including recycle volumes, were not available, which is standard for engineering and EA sequencing for major projects. Denison intends to continue to refine effluent quality and volume predictions as part of the BATEA assessment and licensing phase of the Project. The predictions provided in the EIS will continue to bound the assessment, and provide a conservative representation of risk to human health and the environment. Further, more detailed information regarding the design and operation of the IWWTP and water management infrastructure (including discharge rates, recycle rates among many other things), as informed in part by the BATEA assessment, will be included with

				Denison's application for the license to operate which will provide opportunity for review and comment by Interested Parties. For reference, the IWWTP would be commissioned prior to the Operation phase as no discharge of treated effluent would occur until that time.
31	BNDN (February 28, 2023)	Figure 2.2-15 Section 2.2.3.2	Comment #31: In Section 2.2.3.2 and Figure 2.2-15 of the draft EIS, Denison describes their water balance for the project and anticipated water needs to operate the ISR wellfield. BNDN notes that the EIS does not describe how Denison derived their estimate for the quantity of water required to operate the ISR wellfield. BNDN is concerned that the volume of water required to operate the wellfield may be substantially greater than is estimated in the draft EIS. Utilizing greater volumes of water in the wellfield would have cascading effects throughout the water balance, including greater demand on the IWWTP, greater storage volumes required in the process water storage pond, greater UBS holding pond capacity and greater volumes of effluent discharge to Whitefish Lake. BNDN is concerned with the potential cascading risks associated with an inaccurate assessment of the volume of water required to operate the ISR wellfield. BNDN also wishes to understand whether it is possible that Denison will be required to operate the wellfields at a higher pressure, even if only temporarily. BNDN notes that operating wells at higher pressure come with additional workplace and environmental hazards, especially when dealing with a strongly acidic lixiviant. Request/recommendation: a) To demonstrate that Denison has not significantly underestimated the volume of water required to operate the wellfield, BNDN requests that Denison provide evidence that the volume of water required to operate the wellfield is accurate. This should include an assessment of their level of confidence they have in their estimated water consumption. b) BNDN requests that Denison provide BNDN with information on potential contingency measures (such as constructing additional process water pond capacity) should their estimated water consumption be underestimated c) Denison must commit to updating their mixing zone assessment should they find it necessary to discharge greater quantities of effluent to Whitefish Lake than is estimated in the draft EIS. d) Denison must document the implications of operating the wellfield at a substantially higher pressure than currently expected. See Section 4.3 for additional information on this topic (p. 25-28).	a) Based on Denison's site-specific drilling, development, and pumping requirements over several years of exploration activities, the wellfield drilling water estimates presented in the EIS water balances are achievable. Denison's recently released feasibility study reaffirms the EIS assumptions related to water use and water recycle abilities. b) A key aspect of Denison's management system will be ongoing evaluation of the Project's performance compared to EIS predictions as well as continual improvement and adaptive management, as required. Should water consumption needs fall below those outlined in the EIS, Denison will follow all required permitting, licensing, and engagement with Indigenous nations and communities to describe and assess what those continency measures would be. c) The near-field analysis (Section 8.2.4.2.3) identified that under all flow regime scenarios (i.e., 7Q10, monthly low, and monthly average), constituents are expected to be well mixed within Whitefish Lake (LA-5) and below the most restrictive criteria for the protection of aquatic life (Table 8.2-10; Appendix 8-C and Appendix 8-D). Additionally, the extent of the mixing zone in Whitefish Lake is estimated to be less than 5 m under all flow scenarios assessed (Table 8.2-11). Denison will comply with the Water Security Agency's Guidelines for Effluent Mixing Zones and Denison would update modeling if the base assumptions associated with the discharge of treated effluent to Whitefish Lake were changed, as needed. d) Wellfield pressures were described in the draft EIS, Sections 2.2.1.4.2 and 2.2.1.4.3. In terms of pressures, ISR mining is planned at nominal pressures of 100 psi and intermittent pressures of up 250 psi.
32	BNDN (February 28, 2023)	Table 2.3-3	Comment #32: Table 2.3-3 of the draft EIS shows Denison's proposed mining area decommissioning objectives, which are the groundwater quality objectives for the residual water in the ore zone following the flushing of the system during mine decommissioning. BNDN is surprised to see that relatively high concentrations of metals are expected to remain in the restoration solution as a final objective, such as 100 mg/l uranium and 2 mg/l cobalt, amongst many other metals. BNDN notes that potential risks to groundwater and surface water could be dramatically reduced through more stringent mining area decommissioning objectives. It is also feasible that processing efficiencies and high uranium prices may allow for substantially lower concentrations of uranium to be mined economically. The long-term contamination of groundwater from the high concentration of metals in the restoration solution is one of BNDN's primary concerns with the Wheeler River Project, and BNDN would strongly prefer that Denison strive to minimize the residual contamination remaining in groundwater following decommissioning to the greatest extent possible. Request/recommendation: a) BNDN requests that Denison provide documentation that estimates the time, efforts and costs associated with reducing concentrations of metals in the restoration solution by 1 order of magnitude and 2 orders of magnitude. Note that these calculations should include costs that could be recovered by processing subeconomic UBS. b) BNDN requests that Denison work with BNDN through terms defined in a BNDN project	Groundwater remediation targets provided in the draft EIS were from derived from metallurgical test results completed from 2017 to 2021 with over 125 kg of material recovered from Phoenix deposit that underwent leaching and neutralization test work (see response to IR-67). In 2022 and 2023, metallurgical test work continued to further optimize remediation and strategies and confirm test work results presented in the draft EIS. It is expected that metallurgical test work will continue in the future to further optimize remediation targets, and this will be advanced through updates to the Decommissioning Plan. The Feasibility Field Test (FFT) provided additional confirmation that pH target and remediation targets could be met. Data gathered during the neutralization phase of the FFT provide confidence that groundwater targets proposed in the draft EIS can be met technically and economically. Based on laboratory testing and the results of the 2022 field testing, subsurface remediation is planned to consist of rinsing the ore zone with 35 pore volumes of fresh water, slowly raising the pH and then pumping about 75 pore volumes of basic solution through the same portion of the ore zone. This basic solution will in effect further raise the pH to a level that impedes further leaching of the deposit and reduces aqueous concentrations of contaminants of concern to below their environmental target levels. Refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final mining area decommissioning

			agreement to establish achievable decommissioning objectives that would be satisfactory to BNDN. c) BNDN requests that the Crown place a condition of approval upon the Wheeler River Project that Denison is required to work with BNDN to establish mutually agreeable mining area decommissioning objectives. d) BNDN requests that Denison undertake a study of ISR operations elsewhere in the world to determine the lowest concentrations of UBS that could be processed economically utilizing industry best practices and commit to exceeding global standards. See Section 4.3 for additional information on this topic (p. 25-28). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	objectives will be developed prior to initiation of groundwater remediation as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for approval. The DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time.
33	BNDN (February 28, 2023)	Section 2.2.2.2.2 Figure 2.2-18	Comment #33: In Figure 2.2-18 of the draft EIS, Denison shows the proposed design of the double composite liner system for the ponds on site and the uranium bearing solution (UBS) holding area. BNDN notes that the risks associated with temporary storage of UBS is much greater than other contact water on site which is proposed to be stored in a similar means. As such, BNDN is concerned that the proposed UBS holding area does not have adequate leak detection given the additional risk associated with the UBS relative to contact water on site. BNDN also notes that open air storage of UBS presents the risk of incidental interactions with wildlife near to the project (such as birds), which would potentially be acutely toxic. BNDN is also concerned that there is no leak detection system below the secondary HDPE geomembrane and geosynthetic clay liner. Should the secondary containment layers also become compromised, Denison does not have a system planned to detect this. Request/recommendation: a) BNDN requests that Denison commit to storing UBS in appropriate tanks as opposed to open air storage. b) BNDN requests that Denison include a leak detection pipe in the prepared subgrade below the secondary containment as well as between the primary and secondary containment layers. BNDN also requests that the prepared subgrade be engineered to facilitate maximum utility of the leak detection below the secondary containment. See Section 4.3 for additional information on this topic (p. 25-28).	As outlined in draft EIS Section 2.2.2.2.2, Denison will evaluate options to use tanks instead of holding area as engineering advances. It is also important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1). Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. The details requested by BNDN will be developed to support licensing and will be included in Management System programs / plans including for example the Groundwater Monitoring Plan and the Emergency Response and Preparedness Plan.
34	BNDN (February 28, 2023)	Figure 2.3-1	Comment #34: Denison shows an additional ore body to the Southwest of Phase 5. Denison has not included this additional ore body in the mine plan in the draft EIS and has not discussed whether they have intentions to mine this ore body or undertaking a project change at a later date to include this additional ore body. It is unclear whether this additional ore body has any implications for the long term groundwater quality modelling either through the additional orebody altering anticipated groundwater chemistry, or the restoration solution dissolving metals in the additional orebody increasing overall metal loading. Given the probable difference in groundwater and mineral geochemistry in the additional orebody relative to the overlying sandstone and underlying basement rock, there is likely to be interaction between the restored solution and the additional orebody post-closure. Request/recommendation: a) BNDN requests that Denison clarify whether they are considering adding the additional orebody to the southwest of Phase 5 into the mine plan, including clarifying whether the additional ore body is amenable to ISR mining. b) BNDN requests that Denison clarify what the anticipated permitting associated with the additional ore body would be. c) BNDN requests that the post- decommissioning groundwater modelling for the Project include interactions between the additional ore body and the restoration solution to understand if the ore body poses a risk of additional metal loading to groundwater. See Section 4.3 for additional information on this topic (p. 25-28).	a) and b) The small deposit to the SW of Phase 5 is amendable to ISR, but is of lower grade than the areas targeted in mining phases 1 through 5 and mining of that low grade areas is not being considered at this time. It is noted that The Project mining and milling capacity will be bound by the assumptions in the EIS, which includes a production rate higher than the current reserves. The Project would be reviewed to determine what if any changes to the design basis would be anticipated and then what permitting would be required, should additional mining beyond what is contemplate by the EA be considered in the future. c) The additional modelling recommended by the review comment is unnecessary at this time. The low grade area is not considered in the mine plan at this time. Should that change, as noted above, the Project would be reviewed to determine what if any changes to the design basis would be anticipated and then what permitting would be required. Such modeling as envisioned by the review comment would be done that time as may be required. Hydrogeological investigations have been ongoing in the field and in laboratories since 2014. Packer, open hole, and cross hole tests have been completed in conjunction with exploration drilling programs. As well, permeability tests have been completed on sections of available competent core within the Phoenix deposit. Open hole water level surveys have been completed across the site in 2015, 2017, 2021 and 2022. Data gathered during the field tests have been utilized for both the EA groundwater model as well as the mining model. The primary direction of groundwater flow at depth is to the north east, which means restored solutions will move away from the small deposit to the SW. Additionally, as noted in the response to BNDN Comment #32, the restored solution will be basic and will further raise the pH to a level that impedes further leaching of the

				deposit and reduces aqueous concentrations of contaminants of concern to below their environmental target levels.
35	BNDN (February 28, 2023)	Section 2.2.1.3 Section 7.6.2.1	Comment #35: Denison intends to use a freeze wall as tertiary containment for the operation of the wellfield during operations. In general BNDN is supportive of this containment measure but requires further information to have confidence that the freeze walls will operate as designed. In particular, BNDN notes that while the freeze wall will be continuous from the ground surface all the way into the basement rocks underlying the orebody, the freeze wall is by far the most consequential immediately around the ore body itself. The orebody is approximately 400 m below the ground surface (where the earth would be significantly warmer) and the lixiviant is expected to be at least 10 degrees warmer than the surrounding groundwater would be. Considering that the cold brine will need to be injected nearly half a kilometer into the earth where warm lixiviant will be injected into the wellfield, BNDN is concerned that the freeze wall may be ineffective in and around the ore body where it is required. Furthermore BNDN is concerned that the monitoring system for assessing the stability of the freeze wall may not adequately detect the continuity of the freeze wall at depth. As such, BNDN is concerned that the freeze wall may be ineffective and in fact obscure our ability to recognize contamination of the surrounding groundwater from the freeze wall operating ineffectively. Request/recommendation: a) BNDN requests that Denison provide information to demonstrate that the freeze wall will in fact be frozen in and around the ore body. If there is any doubt that the freeze wall will indeed be frozen around the ore body, Denison should describe further measures they can undertake to ensure that the freeze wall is frozen as intended around the ore body. b) Denison must provide BNDN with further information on how they will monitor the performance and continuity of the freeze wall. c) BNDN requests further information on the proposed groundwater monitoring program around the wellfield. d) BNDN requests the opportunity to review the groundwater monitoring plan and to review groundwater monitoring data as part of a BNDN-Denison environmental committee developed through a BNDN-Denison project agreement. See Section 4.3 for additional information on this topic (p. 25-28).	a) Please refer to the Attachment to IR-10 for information on the freeze wall integrity and basis for the design, which relies on site field data and lived experience from several existing Saskatchewan mining operations. b) The following explains how the continuous freeze wall will be monitored. The alignment of the freeze wall is located 25 m offset from the lateral extent of the recoverable ore and the freeze wall will grow in thickness both towards the ore and away from the ore. The freeze wall will solidify all liquid porewater and develop into a contiguous impermeable barrier many metres thick. Ground temperature monitoring will be installed through a series of continuous fiberoptic temperature and pressure wells from surface to the depth of impermeable basement rock below the unconformity. Such monitoring wells/systems will be installed on both the ore (inside) and non-ore (outside) sides of the freeze wall to confirm the thickness of frozen ground. There will be sufficient operational controls in place to verify that the freeze plant is operating, to measure the temperature in the ore zone, and to measure the temperature on opposite sides (inside and outside) of the freeze wall so that early detection of any upset conditions can be identified and addressed. Options for addressing issues include: lowering the temperature of the freeze system to draw more heat out; increasing the freeze coolant flow rates in freeze wells nearer to active ISR cells; and/or to adaptively manage the lixiviant injection and recovery rates in cells located nearest to the freeze wall. c) Regarding the monitoring program: A framework for the groundwater monitoring plan was provided in Section 7.8.2 of the draft EIS and is commensurate with the level of development of the Project. Further details regarding the Environmental Management Program and its associated plans (of which the groundwater monitoring plan is one) will be developed later in 2023 and 2024 as part of the licensing process. Engagement on licensing requirements, including on program and plan documentation will occur at that time. d) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project, such as BNDN. Denison does not anticipate separate funding for BNDN at this time.
36	BNDN (February 28, 2023)	Section 2.9.1.3.1	Comment #36: Denison documents their conceptual level environmental protection program, including several proposed management and monitoring plans which they will develop to manage operations on site. The environmental protection measures which Denison undertakes at the Project site are highly consequential to BNDN, and BNDN requires the opportunity to provide our knowledge and input into environmental protection measures developed for activities within our Ancestral Lands. Request/recommendation: a) BNDN requests that Denison commit to involving BNDN in the development, review and approval of all environmental monitoring plans developed for the Project. Details of BNDN involvement in the development of environmental monitoring plans should be undertaken within an Environmental Committee, with specific terms defined within a BNDN-Denison Project Agreement for the Wheeler River Project b) BNDN requests that the CNSC impose a condition of approval on the project which states	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce

			the requirement for Denison to consult with BNDN on all environmental management and monitoring plans for the project. See Section 4.3 for additional information on this topic (p. 25-28). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
37	BNDN (February 28, 2023)	Section 7.6.2.3	Comment #37: In Section 7.6.2.3 of the draft EIS and the geology and groundwater summary table in Appendix 16A, Denison states that they expect no residual effects to groundwater quality during the operations, decommissioning or future centuries period of the Project. Denison has also not placed a significance determination on the impacts to groundwater quality based on the findings of the draft EIS due to groundwater being considered an intermediate VC. BNDN disagrees with both the residual effects assessment and the fact that groundwater quality has been assessed solely as an intermediate VC. The protection of groundwater resources is highly important to BNDN. Our members place immense value on clean spring water and the protection of groundwater more generally. The advancement of the Wheeler River Project will permanently impair groundwater resources in and around the Wheeler River Project. The contamination of groundwater at the Project will have a significant impact on our members' connection to the land and ability to exercise our Treaty and Aboriginal rights. BNDN see the limited interpretation of residual effects and the lack of inclusion of groundwater quality as a receptor VC as a significant oversight in the assessment of impacts of the Project on the environment and BNDN Treaty and Aboriginal rights. This must be corrected to properly assess the Project and thus ensure that project impacts are appropriately mitigated and accommodated. Request/recommendation: a) Denison must apply a significant determination to groundwater quality and quantity for all projects phases, including the future centuries period. The significance determination must be developed following consultation and engagement with BNDN. b) Denison must re-evaluate the residual effects of the project on groundwater quality including the future centuries period. This re-evaluation must be following consultation and engagement with BNDN. c) BNDN requests that the CNSC work with our Nation to understand the significant impacts that the permanent contamination of groundwater caused by the project will have on our Treaty and Aboriginal rights. See Section 4.3 for additional information on this topic (p. 25-28). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	The Groundwater Quality VC was carried through the EIS as an intermediate VC. The shallow and deeper groundwaters are not considered to be a potable water source currently nor in the future within the LSA (defined in Section 7.1.3.1), as detailed in Section 7.1.1.1.Within the LSA, the Groundwater VC was considered an intermediate VC as it is a pathway to the aquatic environment and considered in the future centuries period in Section 8. It is also important to note that the mining area is 400 m below surface and the existing/baseline groundwater quality in the ore zone area is poor (e.g., high in iron and uranium compared to shallower groundwater; Figure 7.3-11). Section 7.6 describes the residual effects evaluation for geology and groundwater, including for the life of mine (0 to 38 years) and the future centuries period. It is Denison's opinion that the approach associated with evaluating Project effects to groundwater quality is appropriate and reasonable for the reasons presented in the draft EIS. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a community specific monitoring regime, suited to each of their interests and needs, in an agreed-upon fashion. One of the key goals of such collaboration with each Indigenous nation will be to provide the information necessary to the communities such that it provides confidence to community members regarding the impacts from the Project to the aspects of the environment which matter the most to them. 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 First Nations who may have interest in the Project. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
38	BNDN (February 28, 2023)	Section 7.8.2	Comment #38: Section 7.8.2 of the draft EIS documents the groundwater monitoring proposed for the surface facilities and the ISR recovery area. It also describes a conceptual excursion contingency plan wherein Denison has proposed their plans to manage situations where groundwater contamination occurs beyond what is predicted in the EIS. BNDN notes that Section 7.8.2 lacks information on the involvement of Indigenous Nations related to groundwater monitoring. As stated previously, BNDN is highly concerned with the level of impact the Project will have on groundwater resources. As such BNDN requires Denison to communicate excursions of groundwater and the consequent management of excursions to our Nation. Request/recommendation: a) BNDN requests that Denison revise Section 7.8.2 to include Indigenous engagement and input for groundwater monitoring results and the management of observed groundwater excursions. The manner in which Denison engages BNDN on groundwater monitoring and management will likely occur through an Environmental Committee, which should be defined in a BNDN-Denison Project Agreement. b) BNDN requests that the CNSC impose a condition of approval on the Project that clarifies	Denison agrees with BNDN's comment that groundwater monitoring will be an important component of the Project as it advances. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

			that Denison is required to engage with impacted Indigenous Nations such as BNDN on groundwater monitoring and management. See Section 4.3 for additional information on this topic (p. 25-28). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
39	BNDN (February 28, 2023)	Appendix 8D	Comment #39: In Appendix 8d, Denison documents their baseline aquatics studies undertaken for the Wheeler River EIS. Denison has included some lakes and rivers upstream of the Project as background sites for understanding project impacts to the aquatic environment. BNDN notes that there are many additional sites throughout our Ancestral Lands which would benefit from ongoing aquatic monitoring and would be potentially suitable for the Project as background sampling sites. Request/recommendation: - BNDN requests that Denison work with our Nation to identify potential additional background sampling sites within our Ancestral Lands for aquatic monitoring for the life of Project. The details of such should be defined in the BNDN-Denison project agreement. See Section 4.3 for additional information on this topic (p. 25-28).	Denison appreciates and acknowledges the recommendation. At this time Denison believes suitable candidate references areas are available upstream of the Project site in areas located in the same drainage system / watershed. While proximity to the Project is only one of many considerations for suitable reference area selection in this case the ability to be able to compare relevant measurement endpoints between "reference" vs "potentially influence" sampling locations where the primary difference between locations is the point source discharge is compelling rationale. Additionally, data that have been collected from upstream areas as part of baseline programs provides the opportunity to implement aquatic monitoring according to a Before After Control Impact (BACI) design, that will provide the ability to monitor change temporally (among sampling periods) and spatially (among sampling areas), thereby providing a more robust means by which to assess potential mine related effects, which is a powerful means by which to assess and isolate potential mine related effects from natural environmental change. Given the above, Denison does not see that there is rationale for investigating lakes over a regional extent to establish reference areas for aquatic monitoring as is suggested.
40	BNDN (February 28, 2023)	Section 2.2.1.4.2	Comment #40: In Section 2.2.1.4.2 of the Draft EIS Denison discusses the operation of the wellfield during the operations phase of the mine. BNDN notes that many of the details in this section are conceptual in nature and thus could require significant refinements in design to achieve the desired recovery consistently throughout the life of mine. Amongst other concerns related to operations of the ISR wellfield, BNDN is concerned that Denison may alter the chemical composition of the lixiviant used in the ISR wellfield which could cause inadequately understood changes in potential effects of the Project to the environment. These effects could include significant changes to the final restorative solution at the end of mine life or significant changes in the treatment requirements for the IWWTP that impact the ability of Denison to achieve effluent quality criteria for significant periods of time. Request/recommendation: a) BNDN requests that Denison provide information on: - The likelihood of the chemical composition of the lixiviant changing throughout the life of project - Potential changes to the lixiviant composition - The implications for long term groundwater quality and effluent treatment from changes in lixiviant chemistry b) BNDN requests that Denison commit to ongoing communications and engagement with BNDN regarding changes to the wellfield operation throughout the life of mine. The terms of engagement should be defined in a BNDN-Denison project Agreement. See Section 4.3 for additional information on this topic (p. 25-28).	a) It is important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1). Detailed ISR mining-related information needed to support licensing and permitting has not been included in the EIS; it will be provided to regulators as part of permitting and licensing. For the EIS, an initial understanding of the mine plan and mining area remediation was needed to initiate the assessment of migration of constituents of potential concern in groundwater out of this area in the post-decommissioning period. The findings and conclusions of the EIS were also used, in turn, to inform and bound the engineering and feasibility work. As part of the metallurgical test program, over 125kg of core from the Phoenix deposit has been leached in a variety of settings, including bottle rolls, column tests, and intact core tests. This has helped to predict concentrations of both the lixiviant as well as the production solutions. The lixiviant (mining solution) concentrations will vary depending on each individual well production profile. To ensure reagent consumption is effective and efficient it will be varied during the life of each well dependent on its characteristics. The initial acidification of the well requires a lower acid content to ensure the formation does not plug due to precipitation, whereas during periods of high production the well can accept a higher acid concentration. Towards the end of the recovery curve, the uranium is more difficult to access and therefore the strength of the acid or the flow rate to the well need to be optimized to ensure efficient use of reagents. It is expected that the lixiviant concentrations will vary between 0-60 g/L H_2SO_4, and 0-20g/L H_2O_2 and will be situationally dependent. There is also the capability to add $Fe_2(SO_4)_3$, however it is not expected that this will be required in significant concentration due to the natural abundance of iron in the deposit. b) Please see response to Comment #19 for Denison's response on a Project agreement.
41	BNDN (February 28, 2023)	Appendix 8E Table 4	Comment #41: Table 4 of Appendix 8e of the draft EIS shows the predicted site discharge concentrations of the contaminants of potential concern (COPCs). BNDN notes that the concentrations of a number of COPCs do not achieve water quality objectives that is the best available technology economically achievable (BATEA). Example COPCs include copper, molybdenum, selenium, uranium, vanadium, zinc and ammonia. BNDN requires proponents operating on our Ancestral Lands to, at a minimum, achieve BATEA standards for effluent treatment and discharge. This takes reasonable and appropriate precaution without imposing unreasonable costs on the operation. Request/recommendation: a) BNDN requests that Denison commit to achieving BATEA criteria for all COPCs in their effluent.	a) Denison is undertaking a sequential EA and licensing process under the NSCA. For context, the EA process for a Project under CEAA 2012 and the Saskatchewan Environmental Assessment Act is long and complex. As such, the inputs and outputs (e.g., effluent quality) needed for the EIS were developed by Denison's Project engineers early in the EA process to allow for the biophysical and human assessments to advance. An example of one of these outputs is the IWWTP effluent quality. The effluent quality predictions in the EIS provide a bounding scenario of the basis of the assessment of Project effects. As stated in the Draft REGDOC 2.9.2 Denison understands that a BATEA assessment be conducted to determine the predicted design release characteristics as part of the licence application for a new facility or activity. Outside of the EIS process, the Project detailed engineering is progressing, including the design of the IWWTP and associated refinement of effluent quality predictions. Denison is

			b) Denison must work with BNDN to identify mutually agreeable and appropriate effluent discharge criteria for their effluent. BNDN expects that identifying suitable effluent discharge criteria will be undertaken through an Environmental Committee with a terms of reference defined in a BNDN-Denison project agreement c) BNDN requests that the CNSC impose a condition of approval on the Project that BNDN is engaged. See Section 4.3 for additional information on this topic (p. 25-28). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	following Draft REGDOC 2.9.2 to arrive at a treatment option that remains within the bounds of the EA, which ultimately predicts no significant impacts to the receiving environment. The maximum design release characteristics for the IWWTP will be provided as part of Denison's licence application to the CNSC. b) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to engagement with English River First Nation and Kineepik Métis Local as it relates to effluent discharge criteria, suited to each of their interests and needs. Denison does not anticipate working closely with BNDN on this topic.
42	BNDN (February 28, 2023)	Appendix 8E Table 7	Comment #42: Table 7 of draft EIS Appendix 8e shows the anticipated size of the mixing zone under 3 different flow conditions, including the calculated 7Q10 flow. While BNDN understands that Denison expects to discharge relatively small volumes of effluent to Whitefish Lake compared to a conventional open pit or underground mining operation, BNDN is concerned that the mixing zone assessment underestimates the magnitude of impact that the project will have on Whitefish Lake. Request/recommendation: - BNDN requests that Denison undertake a plume delineation study and provide BNDN the opportunity to review the findings of the study through the BNDN-Denison Environmental Committee for the Wheeler River Project. See Section 4.3 for additional information on this topic (p. 25-28).	The prediction uncertainty analysis (i.e., "sensitivity analysis") presented in Appendix 7-C included an evaluation of the change in the model prediction (i.e., plume migration) with respect to changes in the conductivity of materials along the flow path to the receptor, Whitefish Lake (i.e., Scenarios 4, 5, and 6) as well as regarding the hydraulic conductivity of the mined-out ore zone. As such we feel that the work requested by the reviewer has already been completed and reported upon within the draft EIS. In addition, the uncertainty of the Intermediate Sandstone Aquifer was evaluated (see IR55), where higher hydraulic conductivity within the Intermediate Sandstone Aquifer were found to reduce the proportion of water from the ore zone reaching Whitefish Lake, which would have the effect of further reducing (i.e., diluting) concentrations simulated and presented in the EIS documentation. As such, the conditions documented in the draft EIS are already conservative with respect to the uncertainty in these parameters. The near-field analysis (Section 8.2.4.2.3) identified that under all flow regime scenarios (i.e., 7Q10, monthly low, and monthly average), constituents are expected to be well mixed within Whitefish Lake (LA-5) and below the most restrictive criteria for the protection of aquatic life (Table 8.2-10; Appendix 8-C and Appendix 8-D). Additionally, the extent of the mixing zone in Whitefish Lake is estimated to be less than 5 m under all flow scenarios assessed (Table 8.2-11). Denison will comply with the Water Security Agency's Guidelines for Effluent Mixing Zones. The above notwithstanding in-field confirmation of the extent of the effluent mixing zone is anticipated following commissioning of the IWWTP and effluent discharge system during the Operation phase of the Project. As a result of the continued technical review until October 2024, Denison will conduct a sensitivity analysis of low flows and high flows to assess how low and high flows may change under future climate conditions and the potential implications on water quality predictions made during the EA phase. As a result of the continued technical review until October 2024, Denison has made the commitment that the final diffuser configuration will not change the environmental assessment conclusions of risk to aquatic receptors and that the water quality will remain below guideline
43	BNDN (February 28, 2023)	Appendix 10A	Comment #43: BNDN notes that the environmental risk assessment (draft EIS Appendix 10a) makes no mention of potential impacts the project may have on mercury biogeochemical cycling and the consequent risks to the environment and human health. This is unsurprising given the lack of baseline sampling of mercury in sediments and soils, especially wetland soils. The lack of baseline mercury sampling is a significant oversight given the significant impact that mining operations can have on mercury biogeochemistry, including mercury methylation, and mobility of mercury species within the environment. BNDN is very concerned with the complete lack of assessment of this important consideration for the project and the consequent inability for our members to adequately understand the potential risks to our Treaty and Aboriginal rights from these risks. Note that the absence of baseline information gathered can be reasonably considered an impact on our Treaty and Aboriginal rights as our members will avoid exercising our rights if BNDN lack the information to have confidence that it is safe to do so.	Although baseline concentrations of total mercury in sediment have not been collected during baseline sampling to date, Denison will collect background information pertaining to sediment total and methyl mercury from LSA lakes and rivers prior to site development. 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; 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. 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. 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. 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 applicable human health risk-based maximum permissible concentrations.
44	BNDN (February 28, 2023)	Table 2.2-4	Comment #44: In Table 2.2-4 of the Draft EIS, Denison documents their planned chemical used for the project. BNDN notes that Denison intends to use zero-valent iron (ZVI) in the IWWTP, but not as part of the remediation solution for the mine. BNDN notes that ZVI is used to treat contaminants in groundwater around the world. Denison has not discussed whether they have investigated the possibility of utilizing ZVI to remediate the wellfield during decommissioning. Protection of groundwater is of exceptional importance to BNDN. BNDN is concerned that Denison has not made a complete or comprehensive effort to understand how to minimize negative impacts to groundwater from the project using proven technologies that may be suitable for remediating the restoration solution in the wellfield during the decommissioning phase of the mine. Request/recommendation: - BNDN requests that Denison investigate the suitability of using zero-valent iron to remediate the groundwater within the wellfield as part of the decommissioning process. See Section 4.3 for additional information on this topic (p. 25-28).	Refinement of the mining area decommissioning objectives and associated modelling will be done through updates to the Decommissioning Plan, and will be bounded by the objectives evaluated in the EIS. The use of zero-valent iron will be evaluated, as applicable.
45	BNDN (February 28, 2023)	8.2.4.1.1 Site Water Management	Comment #45: BNDN is concerned that the small volume of Effluent Monitoring and Release Ponds may create a lack of operational flexibility. For example, in the EIS, it is stated that: "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." – EIS, pp 723 If water quality in these ponds exceeds discharge criteria then there may be a need to store water so that additional treatment and monitoring can occur prior to discharge. However, only having capacity for three days of storage means it is unlikely the Proponent would be able to adequately treat water prior to reaching storage capacity, resulting in a need for emergency release of poor- quality water. Request/recommendation: a) BNDN requests that additional storage capacity be included as part of the design for water management system. This must include adequate storage capacity to ensure Denison has the ability to retain water for sufficient time to allow treatment, in the event that exceedances of water quality discharge criteria occur. Alternatively, Denison can commit to halting discharge (and operations if required) should water quality exceed discharge criteria. Discharge into Whitefish Lake would resume once water quality in the Effluent Monitoring and Release Ponds has been returned to below discharge criteria. b) BNDN requests that the CNSC impose a condition of approval for the Project that requires Denison to must meet effluent discharge criteria prior to discharge and must halt operations if treated effluent in the monitoring and release ponds does not meet effluent discharge criteria. See Section 4.4 for additional information on this topic (p. 48-51). [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	a) During Construction, no effluent is expected to be released to the aquatic environment. Contact water stored in the Clean Waste Rock Pond during Construction will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / license requirements. The sequence for Construction activities will occur in a logical manner based on Project execution plans. For example, construction of the wellfield runoff pond will be prioritized during the early part of Construction and it will able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the Clean Waste Rock Pond. Other secondary contingency measures are also available should the volume of water requiring management exceed site infrastructure storage volume. This could include use a hydrovac for offsite disposal. Section 2 Project Description, Section 2.2.3.9 Treated Effluent Monitoring and Release Ponds of the draft EIS outlines Denison's commitment to test effluent prior to discharge to Whitefish Lake, to ensure it meets federal and provincial discharge limits. Any pond not meeting the criteria will be recycled back to the Industrial Wastewater Treatment Plant via the process water pond. b) Denison expects the Provincial Approval to Operate a Pollutant Control Facility will contain specific effluent quality limits and monitoring to confirm effluent quality meets the approved limits. Denison will also be required to meet conditions in CNSC licensing documentation, as well as MDMER effluent discharge criteria.
46	BNDN (February 28, 2023)	Appendix 8D Aquatic Environment Baseline Study	Comment #46: Fish community sampling is an important component of baseline studies for many reasons, including identifying species present (including any species at risk) and evaluating relative abundance (e.g. CPUE). A robust program should include multi- season and multi-year approach. This allows improved characterization of seasonal habitat use and accounts for natural variability. In the baseline aquatic assessments, the Proponent has focused fish community sampling in fall 2016, with some limited additional sampling of in spring 2017. This low level of effort will make it difficult to draw meaningful comparisons with monitoring work that will occur during the life of mine. Furthermore, CPUE has only been reported for electrofishing effort. As a result, there is very	It is Denison's and their aquatic SME's opinion that the baseline fish community sampling efforts, including information provide from Indigenous and local resource users, provide a sufficient basis for conducting an effects assessment (draft EIS Section 8.3 Fish and Fish Habitat). Based on the information collected there is a good understanding of fish species presence / absence, relative abundance, fish habitat characteristics including areas that contribute to important life history stages (e.g., spawning areas) and fish habitat use. Denison does not believe further extensive baseline collection are needed to support the environmental assessment process but will implement targeted aquatic surveys prior to site development (see below).

			limited information available for relative abundance of fish in important waterbodies, including Whitefish Lake, McGowan Lake, and Russell Lake. **BNDN notes that a raw representation of total effort is provided in table A-13 of Appendix 8D but requests that an assessment of total effort, total catch, and CPUE be presented in the EIS for each capture method/location** Request/recommendation: a) BNDN requests that the Proponent build on the existing data for fish community sampling by collecting an additional round of spring and fall sampling. b) BNDN requests that an assessment of total effort, total catch, and CPUE be provided for each capture method/location where fish sampling has occurred. See Section 4.4 for additional information on this topic (p. 48-51).	With respect to inclusion of the additional information requested the following is noted. Both detailed and summary data are presented in the Baseline Aquatic Environment Report that was provided as an appendix to the draft EIS. Effort and catch by sampling gear type by sampling location are shown for example in Table A-13 of the Baseline Aquatic Environment Report and metrics such as CPUE and total catches can be derived from these data if desired. Denison does not see the need to derive these metrics for presentation in the final version of the EIS (and supporting documents). This is in part related to the fact that the aquatic effects assessment did use abundance / relative abundance metrics such as CPUE as measurable parameters (MPs; a parameter or metric associated with a key indicator that can be used to detect and measure Project-related changes) to represent the fish and fish habitat VC, nor would it have been practical to use them for this purpose. There would be no practical or reliable way to derive such a prediction of change relative to Protect-aquatic habitat interactions. While abundance / relative abundance metrics may be reported during future monitoring they would not likely be seen as a key measurable parameters for fish monitoring. More subtle measures of fish health would be used for this purpose - it is reasonable to assume that fish health measures will be more sensitive to change than abundance measures and provide an earlier indication of potential Project-related effects. This is what is envisioned and required by the MDMER EEM program, whereby measures of fish health (e.g., growth, reproduction, condition) are used to assess potential effects. As noted above, Denison will implement targeted aquatic surveys prior to site development. At this time it is envisioned that a pre-development EEM program survey following guidance provided in the Metal Mining Technical Guidance Document will be implemented at the site, with sampling at future effluent exposed and reference areas. Best practice is to undertake an analysis of candidate reference areas using the existing baseline information and investigate their utility as controls prior to project development. Execution of the pre-development EEM represents a Before-After-Control-Impact (BACI) design for aquatic monitoring, that will provide the ability to monitor change temporally (among sampling periods) and spatially (among sampling areas), thereby providing a more robust means by which to assess potential mine related effects.
47	BNDN (February 28, 2023)	8.2.5 Mitigation Measures	Comment #47: The Proponent has identified one mitigation measure that includes sharing of monitoring results to assess performance of water management system (EIS, pp 8-90, 8.2.5 Mitigation Measures). BNDN is supportive of this type of information sharing and believes that it can be an important component of transparency and trust- building between the Proponent and other parties. However, it is important that information sharing be done in a way that is accessible to community members. Request/recommendation: - BNDN requests involvement in discussions with Denison about sharing of information related to water quality monitoring (and environmental monitoring more broadly). Some methods of communication that may support accessibility of data include: o Public-facing summary reports on a regular schedule (e.g. quarterly or annually) o Real-time access to environmental monitoring data through online database portals. o Semi-regular community meetings hosted in Turnor Lake (e.g. every 12-18 months, as decided in conjunction with BNDN leadership within a Project Agreement with BNDN). o Presentations to BNDN staff, leadership, and/or community members by BNDN Environmental Monitors. The specific methods used for information sharing and appropriate levels of support from Denison can be determined through consultation with BNDN. See Section 4.4 for additional information on this topic (p. 48-51).	Denison agrees with BNDN that water quality monitoring will be interest to Indigenous nations and communities. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. 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. BNDN will be informed throughout the monitoring program design and implementation process. Further details on the Public Information Program and Public Disclosure will form part of the documentation submitted in support of the CNSC licensing for the Project. It is also noted for further reference that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm), and the Eastern Athabasca Regional Monitoring Program (www.earmp.ca/). Results from these programs provide relevant information and can complement Denison's Project-specific monitoring program. One forum for discussion of monitoring results is the Northern Saskatchewan Environmental Quality Committee(https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-saskatchewan-environmental-quality-committee). Please see response to Comment #19 for Denison's response on a Project agreement.

48	BNDN (February 28, 2023)	8.5 Fish Health	Comment #48: The Proponent has completed predictive modelling for concentrations of contaminants in fish tissue. For example, results of modeling for selenium indicate that concentrations will fluctuate throughout operations but remain below the recommended criterion of 2.83 mg/kg wet weight (from the US EPA). Should the Project proceed, information on contaminants in fish tissues will be highly relevant for BNDN and land users who eat fish from the area. Request/recommendation: - BNDN requests that results of fish tissue monitoring (e.g. EEM studies) be shared in a publicly available and accessible way. This must include comparisons with guidelines and information on other contaminants of importance (e.g. mercury). Discussions regarding how this information can be shared with BNDN should occur alongside the discussions related to water quality monitoring results (see comment above). See Section 4.4 for additional information on this topic (p. 48-51).	Denison agrees with BNDN that results of fish tissue monitoring will be interest to Indigenous nations and communities. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. 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. BNDN will be informed throughout the monitoring program design and implementation process. Further details on the Public Information Program and Public Disclosure will form part of the documentation submitted in support of the CNSC licensing for the Project. It is also noted for further reference that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm), and the Eastern Athabasca Regional Monitoring Program (www.earmp.ca/). Results from these programs provide relevant information and can complement Denison's Project-specific monitoring program. One forum for discussion of monitoring results is the Northern Saskatchewan Environmental Quality Committee(https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis-and-northern-initiatives/northern-saskatchewan-environmental-quality-committee). Please see response to Comment #19 for Denison's response on a Project agreement.
49	BNDN (February 28, 2023)	8.3 Fish and Fish Habitat	Comment #49: Increased fishing pressure in Whitefish Lake from employees working at the Project site and increased ability for visitors due to improved access could negatively impact fish populations. Preferred species, large-bodied fish, and older individuals are most likely to be targeted. This may have negative consequences on the population structure of fish in the lake as well as the ability of BNDN members to exercise fishing rights. Request/recommendation: - BNDN recommends that the policies Denison sets related to staff and contractors fishing while on site are determined collaboratively with BNDN through the Environmental Committee defined in a BNDN-Denison project agreement. See Section 4.4 for additional information on this topic (p. 48-51).	Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. As described in the draft EIS, 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. To prevent entry of land users from entering the Project Area, Denison will control access to the property with both a north and south security gate. Overall, given a lack of resources to access fishing locations and store fish harvests, workforce fishing is expected to cause minimal disturbances to local users. Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take a distinctions based approach (i.e., the potential impact on each Indigenous community is not evaluated separately), but rather on the key indicators and associated measurable parameters. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal. As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible. Detailed Project plans and programs related to staff and contractor fishing will be developed to support Project permitting and licensing efforts.

50	BNDN (February 28, 2023)	8.3.4 Assessment of Project- related Effects	Comment #50: The EIS provides very few details regarding how spills, leaks, and other accidents and malfunctions will be managed to mitigate the impacts on fish and fish habitat. Over the life of the mine there will inevitably be accidents and malfunctions. One of the most common environmental issues that will be encountered is leaks and spills. These can typically be managed through good monitoring and preparedness, though if they occur near water, the ability to clean them quickly is difficult and can result in harm to aquatic communities. Request/recommendation: - BNDN request additional information regarding the development of spill prevention programs, emergency management procedures, and monitoring and remediation programs for accidents and malfunctions. Representatives from BNDN need to be included in the planning and execution of monitoring and remediation activities to provide community perspectives in Project activities. One method through which BNDN can be involved in these discussions is through the development of an Environmental Committee (see comment #51 also). See Section 4.4 for additional information on this topic (p. 48-51).	A standalone Accidents and Malfunctions (A&M) assessment was completed and is summarized in Section 14 of the EIS (full report is Appendix 14-A of the EIS). The A&M assessment considered almost 70 accident scenarios including many that would relate to the unplanned release of chemicals and radiation to the environment with potential to effect country foods. Specific scenarios including the release of chemicals and radiation to the aquatic environment and to the terrestrial environment adjacent to the ERFN and KML culture camps located along Hwy 914. The overall risks in consideration of likelihood and consequence were characterized as low. The assessment concluded that with planned engineering / environmental design features, mitigation measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical. Section 2.9.1.3 of the draft EIS provides Denison's commitment to develop an Environmental Management System, which includes an Emergency Preparedness and Response Program (EPRP) and an Environmental Protection Program (EPP; including an Environmental Monitoring Plan). The EPRP would be established 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. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. The EPP would be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets that Denison may set. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. A such, the details of these programs and plans will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the current stage of the Project approvals process. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and program spatial boundaries will be sufficiently extensive to measure EIS predictions.
51	BNDN (February 28, 2023)	8.3.8 Monitoring and Follow-up	Comment #51: There is no discussion on how Indigenous communities, such as BNDN, will be included in environmental management, emergency management, monitoring, and remediation. This includes issues related to ongoing permitting or specific remediation such as in the case of an accident or malfunction. Request/recommendation: - To support BNDN's ongoing participation in monitoring and oversight of the Project, BNDN request the establishment of an Environmental Committee or similar oversight mechanism. The purpose of the committee will be to review monitoring data and monitoring reports produced during the life-of-mine to ensure that the environmental protection is sufficient for all VCs. The committee can also participate in permitting throughout the life-of-mine for all relevant applications (e.g. Fisheries Act Authorizations, water permits, Closure Plan updates etc.) and provide input to management plans (e.g. EPPs, Surface Water Management Plan, Environmental Monitoring Plans, etc.). The specific details of such a committee can be developed through consultation with BNDN and must be formalized through a BNDN-Denison project agreement. See Section 4.4 for additional information on this topic (p. 48-51).	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

				The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
52	BNDN (February 28, 2023)	8.3.5 Mitigation Measures	Comment #52: Mitigation measures are an important component of Project management which are critical for environmental protection. Upon review of the suggested mitigation measures, BNDN has identified some opportunities for additional mitigation. Request/recommendation: - BNDN request that the following standard mitigation measures be included as part of the list described in Section 8.3.5: o Maintain vegetated buffers of at least 100m with all waterbodies wherever practical; o All equipment must be inspected prior to use on-site to ensure that they are clean and free of soil or other contaminants; o Maintain spill kits on all vehicles used on-site; o All machinery will be kept in good working order and inspected regularly for drips, leaks, and spills; o In the event of a spill, Denison will take all necessary actions, where it is safe to do so, to immediately stop the spill, contain contaminants, clean up and dispose of contaminated materials; o Denison will maintain a record of all spills and report upon each spill within 48 hours, including information on spill response, cleanup, and remediation; o Vehicle refueling will occur at a distance of at least 100m; o Fuel tanks will be located in areas that are lined and contained; o Fuel tanks will be located at least 500m from known waterbodies. See Section 4.4 for additional information on this topic (p. 48-51).	Denison acknowledges the input and will consider the suggestions as the project moves forward. The draft EIS contains a number of mitigations referenced in different biophysical and human environment assessments; these mitigations together form Denison's fulsome commitment list of Project mitigation measures moving forward. Many of the proposed additional mitigation measures are already included in the draft EIS. A few examples are provided here: - Section 2.2.7.6: No fuels, oils, or other hazardous substances will be stored within 100 m of any water body. No equipment maintenance or re-fuelling will be conducted within 100 m of a water body. - Section 2.8: Fuel storage and distribution infrastructure will be constructed in accordance with applicable legislation requirements; Fuels will be stored in approved, above-ground, double-walled storage tank(s) equipped with secondary containment in accordance with provincial regulations and standards; Stationary and mobile equipment will be fueled with a fuel-dispensing truck. - Section 9.2.5.2.7: Standard operating procedures will be employed, and regular inspections of equipment and machinery will be completed to verify they are in good working order; Vehicles and equipment will be maintained in good working condition (e.g., no leaks) and furnished with industry-standard spill response kits. Denison also notes that Section 2.9.1.3 of the draft EIS provides Denison's commitment to develop an Environmental Management System, which includes an Emergency Preparedness and Response Program (EPRP) and an Environmental Protection Program (EPP; including an Environmental Monitoring Plan). The EPRP would be established 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. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. The EPP would be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets that Denison may set. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. A such, the details of these programs and plans will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the current stage of the Project approvals process. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate any funding to BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

53	BNDN (February 28, 2023)	8.3 Fish and Fish Habitat	Comment #53: Unfortunately, due to the nature of planning and licensing for complex projects such as the Wheeler River mine, there are many documents, plans, licenses and approvals which may not be available for review during the environmental assessment process or which will take place subsequent to completion of the assessment. For example, Denison will be preparing important documentation governing environmental management of the Project following the Environmental Assessment. While these are not currently available, there is a need to engage with BNDN to obtain input on these documents as planning progresses. Request/recommendation: - BNDN requests that Denison consult with our staff members and advisors on important environmental documentation/plans/licenses that are not available as part of the EA process. This list includes, but is not limited to: o Surface Water Management Program o Erosion and Sediment Control Plan o Fish Salvage Plan o Spill Response Plan o MDMER approvals and EEM plans o Saskatchewan Water Security Agency permits for o Aquatic habitat protection o Operating a waterworks o Operating a sewage works o Effluent Monitoring Plan o Environmental Monitoring Plan(s) o Decommissioning and Reclamation Plan Engagement with BNDN on these plans should occur through an Environmental Committee or similar oversight mechanism (see above). The specific details of such a committee can be developed through consultation with BNDN and must be formalized through a BNDN- Denison project agreement for the Wheeler River Project. See Section 4.4 for additional information on this topic (p. 48-51).	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
54	BNDN (February 28, 2023)	8.4.3.1 Methodology and Metrics	Comment #54: The collection of sediment samples was completed using cores and grab petit Ponar in three upstream reference locations (LA-7A, LA-8, and LA-9), Whitefish Lake (LA-5 and LA-6), McGowan Lake (LA-1), and Russell Lake (LAB-1 and LAB-2). Sediment quality testing was conducted to characterize COPC including nutrients, metals, and radionuclides. Only the top 2 cm of cores of grab samples were analyzed in the lab. It is not clear in the methodology why laboratory analysis was limited to the top 2 cm. Request/recommendation: - BNDN requests additional information on the rational for only analyzing COPC within the top 2 cm of sediment samples. This should include information on whether this limited data will negatively affect the ability to evaluate potential impacts of groundwater contamination entering Whitefish Lake from below during operations, decommissioning, and future centuries. See Section 4.4 for additional information on this topic (p. 48-51).	Baseline sediment chemistry was conducted on the 0-2cm horizon as this is the area in contact with surface water and the zone inhabited by benthic invertebrates. It is also the sediment layer in which changes in sediment chemistry would be expected to change in response to Project-related inputs and thus provides the most appropriate data for comparison to follow-up monitoring. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).

55	BNDN (February 28, 2023)	8.4.3.2.3 Metals	Comment #55: Despite significant concerns regarding the presence of mercury in water and sediment, the Proponent has elected not to test sediments for it. BNDN acknowledges that the mining process does not use mercury and it is present in low levels in the background environment. However, for the purposes of good stewardship, communications, and trust, having an assessment of the background levels of mercury is important to BNDN. Request/recommendation: - BNDN requests that the proponent sample sediments for mercury to establish background levels. This is information that is culturally important given the potential harm and the psychological toll of mercury in aquatic ecosystems. Background levels can then be compared with ongoing monitoring throughout the life of mine. See Section 4.4 for additional information on this topic (p. 48-51).	Denison will collect background information pertaining to sediment total and methyl mercury from LSA lakes and rivers prior to site development.
56	BNDN (February 28, 2023)	Table 8.5-2: Baseline Fish Tissue Chemistry Summary	Comment #56: In Section 8.5 Fish Health, the Proponent has included a summary table with information on contaminants in fish tissue and bone tissue. The information provided does not include total number of samples. Request/recommendation: - BNDN requests table 8.5-2 be updated with information on total number of fish (n) samples for each location. See Section 4.4 for additional information on this topic (p. 48-51).	The requested information is presented in Appendix 8-D in the draft EIS.
57	BNDN (February 28, 2023)	9.2.5.2 Additional Vegetation- specific Mitigation Measures	Comment #57: The Proponent has committed to using seed that is certified weed-free, with a valid “Certificate of Seed Analysis” for the revegetation process. Request/recommendation: - BNDN recommends that, in addition to using weed-free certified seeds, consultation occur with Indigenous communities, including BNDN, to select an appropriate seed mix that closely mimics the pre- construction plant community and includes plants of medicinal and traditional importance. This could be done by either sourcing seed mix from a local seed distributor, or using wild seed propagated from plants collected from the Project Area. In addition, the seed mix should contain native plant species only. See Section 4.5 for additional information on this topic (p. 59-60).	Specific details of the seed mixture and overall reclamation plan will be developed through updates to the Decommissioning Plan, on which Interested Parties will be provided opportunity for review and input. The decommission plan in the EIS is a conceptual plan. A preliminary decommissioning plan will be included with licence application and reviewed and updated during operations. Prior to executing Decommissioning activities, Denison shall prepare and submit a detailed decommissioning plan to regulators for acceptance, which builds on the preliminary decommissioning plan. Additionally, Denison has partnered with the University of Saskatchewan and Northwest Communities Environmental Services (an Indigenous-owned environmental company) under the Developing Eco-Restoration Together (DERT) program. This unique project aims to co-create ecological restoration practices that centre Indigenous peoples, worldviews, and values while also braiding knowledge from the land, Indigenous knowledge, and western science. The project is supported by the three partners but is ultimately guided by the Indigenous Project Advisory Board, and the Community Liaison/Education Coordinator. Through restoration trials, community engagement, and various planting techniques, Denison, with their partners are seeking to return ecosystem functions in areas where they have been previously disturbed (e.g., exploration cutlines). Through collaboration with community members, University of Saskatchewan, industry partners, two graduate students, and local youth, this project is expected to ultimately inform the creation of a framework for effective restoration practices in northern Saskatchewan that centre on caribou and Indigenous communities.
58	BNDN (February 28, 2023)	9.3.4.2.1 Alteration and/or Loss of Habitat Figure 9.3-9 Available Habitat for Moose	Comment #58: The EIS uses a 500 m buffer around the Project Area to define indirect habitat alteration for moose (Figure 9.3-9). This includes habitat alteration from sensory disturbance such as anthropogenic noises, vehicle traffic, aircraft traffic, and increased predator access. However, the EIS references scientific research that states that roads and vehicle traffic can affect moose habitat selection, resulting in habitat avoidance up to 1 km from roads (Shanley and Pyare 2011). Furthermore, the EIS acknowledges uncertainty concerning the available background and baseline information used to identify available moose habitat in this assessment. Without considering a larger avoidance buffer (as demonstrated in various research) around proposed anthropogenic disturbances, BNDN believe that the EIS underestimates the potential extent of moose habitat alteration. To be more conservative, a 1000 m buffer should be used surrounding the Project area. Request/recommendation: - BNDN recommends using a 1000 m buffer surrounding the Project Area to measure the extent of moose habitat alteration. BNDN believe this analysis will provide a more accurate and conservative outcome with respect to potential project impacts to moose. See Section 4.5 for additional information on this topic (p. 59-60).	It is Denison's and their terrestrial SME's opinion that the approach used to characterize moose habitat alteration provided a sufficient basis for conducting the ungulate (VC) moose (KI) effects assessment (draft EIS Section 9.3). The Project Area had a 500 m buffer applied to account for indirect effects/habitat alteration; this area is within the wildlife LSA. Availability of habitat is not a key limiting factor for moose populations.

59	BNDN (February 28, 2023)	9.3.5.2.7 Mitigation Measures	Comment #59: One of the mitigation measures implemented to protect ungulates, furbearers, and Woodland Caribou includes de-icing the Project roads for winter traction, which will result in fewer wildlife collisions. Salt used for de-icing is likely to attract ungulates, including moose, to roadways to satisfy their mineral requirements (Rea et al 2021). Request/recommendation: - BNDN requests that the Proponent revise this mitigation measure to explicitly state that salt will not be used for de-icing Project roads to avoid attracting ungulates to the Project Area. This mitigation measure can be found in section 9.3.5.2.7 Road and Traffic Management. See Section 4.5 for additional information on this topic (p. 59-60).	Denison has committed to using alternative measures on Project roads for de-icing and winter traction (e.g., sand, gravel) or dust suppression (e.g., water) whenever practicable (Section 12.0).
60	BNDN (February 28, 2023)	9.3.6.4.1 Alteration and/or Loss of Habitat Figure 9.3-14	Comment #60: The EIS uses a 500 m buffer around the Project Area to define Woodland Caribou habitat alteration from sensory disturbance. However, scientific research expects up to 5 km (or greater) of Caribou avoidance around mining Projects, and that related semi- permeable barriers, such as roads, likely exacerbate this effective habitat loss [(Smith et al. 2000; Dyer et al. 2001; Courtois et al. 2008; Vistnes and Nellemann 2008; Nagy 2011; Polfus et al. 2011; Leblond et al. 2011, 2013; CPAWS Wildlands League 2013; Johnson et al. 2015)]. Without considering a larger avoidance buffer (as demonstrated in various research) around proposed anthropogenic disturbances, we believe that the EIS underestimates the potential extent of Caribou habitat alteration. Request/recommendation: - BNDN requests that the Proponent present the extent of caribou habitat alteration/loss from the proposed Project within a range of uncertainty informed by scientific research. Specifically, the percent alteration of habitats must be presented using a 500 m (low end) up to a 5,000 m (high end) buffer. BNDN believe this analysis will provide a more accurate range of outcomes with respect to potential project impacts to caribou. See Section 4.5 for additional information on this topic (p. 59-60).	It is Denison's and their terrestrial SME's opinion that the approach used to characterize caribou habitat alteration provided a sufficient basis for conducting the caribou effects assessment (draft EIS Section 9.3).The Project Area had a 500 m buffer applied to account for indirect effects/habitat alteration; this area is within the wildlife LSA (refer to Figure 9.3-9 for a map showing the spatial areas). The 500 m buffer for habitat alteration was selected in accordance with ECCC's assessment of disturbed areas, which buffered (500 m) anthropogenic disturbances to evaluate the habitat. The alteration of available habitat is quantified in this EIS by applying a buffer of 500 m around the Project Area in which Project effects in the form of sensory disturbance are likely to affect available the habitat and make it functionally unavailable for use. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan. The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat. The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit (once available) and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and SK ENV. Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes.
61	BNDN (February 28, 2023)	9.4.3.3 Bird Species at Risk Appendix 9-B	Comment #61: Incidental observations of Barn Swallow (Hirundo rustica) occurred during baseline studies (Appendix 9- B). This bird SAR was not included as a Key Indicator for this Valued Component. Instead, the EIS represents the Barn Swallow using two other SAR birds including the Olive-sided Flycatcher (Contopus cooperi), and Common Nighthawk (Chordeiles minor). This does not make ecological sense because Barn Swallows use distinct habitat and exhibit distinct breeding behaviour from these other SAR. Therefore, the barn swallow should be its own key indicator because it will have unique levels of habitat alteration/loss and levels of mortality than the other species. In addition, Barn Swallows have a higher likelihood of being impacted by project activities than the other representative SAR, because they nest directly on artificial structures. The EIS states that species that nest on buildings are more susceptible to entrapment in Project components. This species is listed as Threatened on SARA Schedule 1. In Canada, the Migratory Birds Convention Act, 1994 protects Barn Swallow, its nests, and eggs. Request/recommendation: a) BNDN requests that the Barn Swallow is included as its own key indicator for the VC Bird SAR within the EIS. b) Additional surveys should be conducted to confirm the presence of any Barn Swallow nests	The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. The methodology for the habitat-based assessment appropriately evaluated potential adverse effects on avian species using the accepted VC and KI approach for focus of the assessment. As described in the EIS, the Common Nighthawk (similar to the Barn Swallow) is an aerial insectivore that uses a variety of habitats, including anthropogenically disturbed and cleared areas (Section 9.4.3.3.1). As such, effects on these anthropogenically disturbed areas were appropriately assessed in the habitat-based EA methodology. Since Barn Swallows nest almost exclusively on human-made structures, specific Barn Swallow exclusion methods will be added as mitigation measures to the EIS (Section 9.4.5). If Barn Swallow nests should be encountered, any subsequent activities would be conducted in accordance with the 2022 Migratory Birds Regulations. The habitat-based approach for the assessment supports the use of surrogates that are known to utilize the same habitat types. Habitat loss and alteration were assessed for the Key Indicator species included in this Valued Component. A conservative approach of identifying available habitat for these species was chosen to include habitat for those species not directly assessed (i.e., Barn

			on all buildings in the Project Area prior to commencement of construction. c) If Barn Swallow nests are located, contact the SK MOE for regulatory advice on the appropriate actions given the specific situation. d) The Proponent should monitor all barn swallow nests found within the Project Area to confirm their continued usage throughout the lifecycle of the mine. If avoidance of nests is observed near Project activities, the Proponent should adopt an adaptive management approach and provide additional nesting sites elsewhere. Specifically, the Proponent could consider installing nesting structures in suitable areas to provide alternative nesting options for Barn Swallows. e) Staff should be trained to identify and report barn swallows and their nests. f) Future monitoring programs during the life of the project must include the barn swallow. See Section 4.5 for additional information on this topic (p. 59-60).	Swallow through Common Nighthawk habitat). Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as to Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on barn swallow. As a result of the continued technical review until October 2024, the additional specific commitment has been made: Denison has committed to pre-construction and pre-clearing surveys for multiple species. Surveys will be completed by a qualified professional biologist that will refer to available guidance and protocols.
62	BNDN (February 28, 2023)	9.4.3.3 Bird Species at Risk Appendix 9-B	Comment #62: Incidental observations of Horned Grebe (Podiceps auratus) occurred during baseline studies (Appendix 9- B). This species is listed as Special Concern on SARA Schedule 1. The Horned Grebe was not included as a Key Indicator for this Valued Component. Instead, the EIS represents this species with two other bird SAR, Yellow Rail (Coturnicops noveboracensis), and Rusty Blackbird (Euphagus carolinus). The Horned Grebe uses distinct habitat from these other species. Therefore, the Horned Grebe should be its own key indicator because it will have different levels of habitat alteration/loss and levels of mortality. Request/recommendation: a) BNDN requests that the Horned Grebe is included as its own Key Indicator for the VC Bird SAR within the EIS. b) b. Future monitoring programs during the life of the Project must include the Horned Grebe. See Section 4.5 for additional information on this topic (p. 59-60).	The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. While Horned Grebe was not included as a avian SAR in the draft EIS, the EIS identified Yellow Rail and Rusty Blackbird as a surrogate species. To focus the effects assessment on key species, it was decided to use the provincially listed Yellow Rail (and Rusty Blackbird) as surrogates for Horned Grebe. Horned Grebe use similar wetland habitat types for nesting, foraging and protective cover as Yellow Rail. The habitat-based approach for the assessment supports the use of surrogates that are known to utilize the same habitat types. Habitat loss and alteration were assessed for the Key Indicator species included in this Valued Component. A conservative approach of identifying available habitat for these species was chosen to include habitat for those species not directly assessed (i.e., Horned Grebe through Yellow Rail and Rusty Blackbird habitat). As such, potential effects on these habitat types were assessed appropriately in the draft EIS. Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as Attachment to IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on Horned Grebe. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.
63	BNDN (February 28, 2023)	9.4.3.3 Bird Species at Risk	Comment #63: The Bank Swallow (Riparia riparia), a bird SAR may be present within the terrestrial RSA. This species was not included in the EIS as a key indicator for bird SAR. This species is listed as Threatened on SARA Schedule 1. The breeding range of the Bank Swallow (Riparia riparia) overlaps with the terrestrial RSA. Bank swallows breed in varying natural and artificial habitat with sand-silt substrates including vertical banks, riverbanks, bluffs, stockpiles, aggregate pits, and roadcuts (COSEWIC 2013). Suitable habitat may be present because soil surface textures across the RSA are predominantly sand textured (sand, loam sand/sandy loam and silty sand). The creation of soil stockpiles during construction may create suitable breeding habitat for this species. Request/recommendation: a) BNDN requests a justification for excluding the Bank Swallow from the EIS. b) If a valid justification does not exist, BNDN requests this species be added as a Key Indicator for bird SAR unless it can be proven not present in the RSA. c) All soil stockpiles should be monitored for Bank Swallow nesting activity before the stockpiles are disturbed when needed for site reclamation.	The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as Attachment to IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bank swallow.

			d) If Bank Swallow nests are located, contact the SK MOE for regulatory advice on the appropriate actions given the specific situation. See Section 4.5 for additional information on this topic (p. 59-60).	
64	BNDN (February 28, 2023)	9.4.3.3.2 Information from Indigenous Knowledge, Local Knowledge, and Engagement	Comment #64: The EIS states that knowledge providers reported that multiple Whooping Cranes (Grus americana) have been observed along the Wheeler River, Moore River, and along the Cree River (outside of the terrestrial RSA) (19-LK-ERFNTrap- 134.169) (19-LK- ERFNTrap-134.170). Whooping Cranes are listed as Endangered on SARA Schedule 1. The EIS does not include this species as a key indicator for SAR birds, nor does it include an explanation why this species was omitted despite being reported by a knowledge provider from English River First Nation. Request/recommendation: a) BNDN requests an explanation for excluding this species despite being reported by a Trapper from English River First Nation. If a valid justification does not exist, the species Whooping Crane (Grus americana), should be included as a key indicator for SAR birds. b) Future monitoring programs during the life of the Project must include surveys for the Whooping Crane. See Section 4.5 for additional information on this topic (p. 59-60).	The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. The local trapper's observation of Whooping Crane was outside of the avian RSA. The rationale for the selection of the SAR Key Indicators was provided in draft EIS Section 9.4.1. For these reasons, Whooping Crane was not included as a SAR Key Indicator in the draft EIS. for further reference as noted above subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS (a new SAR appendix (new Appendix 9-D). It has been included as Attachment to IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bank swallow As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.
65	BNDN (February 28, 2023)	9.4.3.3.3 Baseline Studies	Comment #65: Short-eared Owls (Asio flammeus) were not observed during the baseline surveys (Appendix 9-B). This is likely because targeted surveys for this species were not conducted. The detection probability of Short-eared Owls is very low at sunrise when the breeding songbird point count surveys were conducted. Short-eared Owls are most detectable from one hour before sunset to half an hour after sunset. Request/recommendation: a) BNDN requests that short-eared Owls continue to be assumed present within suitable habitat, unless proven otherwise by a qualified biologist using the Short-Eared Owl Survey Protocol (Saskatchewan Ministry of Environment 2015). b) Future monitoring programs should utilize the protocol developed by the Saskatchewan Ministry of Environment to better (2015) understand whether this species is present. See Section 4.5 for additional information on this topic (p. 59-60).	The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. Short-eared Owl were included as a KI of the Bird SAR VC in the EIS. A review of life history requirements and discussion on effects assessment are included in the EIS (Section 9.3). In the EIS, Short-eared Owl were assumed to be present and breeding in the Project study areas. As described in the EIS, pre-construction surveys will be conducted prior to the commencement of any vegetation clearing or soil disturbance. Avian species will also be routinely monitored throughout the life of the Project. Results from the surveys and monitoring activities are expected to inform the adaptive management process to update Project design and identify the need for additional mitigation measures, if required. As a result of the continued technical review until October 2024, the additional specific commitment has been made: Denison has committed to pre-construction and pre-clearing surveys for multiple species. Surveys will be completed by a qualified professional biologist that will refer to available guidance and protocols.
66	BNDN (February 28, 2023)	9.4.3.3.3 Baseline Studies	Comment #66: Yellow Rail (Coturnicops noveboracensis) were not observed during the baseline surveys (Appendix 9-B). This is likely because targeted surveys for this species were not conducted. The Yellow Rail is nocturnal; therefore, survey effort must take place between 23:00-3:00. Therefore, this species would not have been observed when the breeding songbird point count surveys were conducted. Request/recommendation: a) BNDN requests that Yellow Rail should continue to be assumed present within suitable habitat, unless proven otherwise by a qualified biologist using the Yellow Rail Survey Protocol (Saskatchewan Ministry of Environment 2014). b) Future monitoring programs should utilize the protocol developed by the Saskatchewan	The process and rationale for selection of VCs and establishment of KIs and associated MPs is described in Section 5.3 in Section 5. Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs were selected based on their likelihood of interaction with the Project, as well as their contributing roles to biodiversity and ecosystem function. Yellow Rail were included as a KI of the Bird SAR VC in the EIS. A review of life history requirements and discussion on effects assessment are included in the EIS (Section 9.3). In the EIS, Yellow Rail were assumed to be present and breeding in the Project study areas. As described in the EIS, pre-construction surveys will be conducted prior to the commencement of any vegetation clearing or soil disturbance. Avian species will also be routinely monitored throughout the life of the Project. Results from the surveys and monitoring activities are expected to inform the adaptive

			Ministry of Environment (2014) to better understand whether this species is present. See Section 4.5 for additional information on this topic (p. 59-60).	management process to update Project design and identify the need for additional mitigation measures, if required. As a result of the continued technical review until October 2024, the additional specific commitment has been made: Denison has committed to pre-construction and pre-clearing surveys for multiple species. Surveys will be completed by a qualified professional biologist that will refer to available guidance and protocols.
67	BNDN (February 28, 2023)	Appendix 9-B	Comment #67: Two bat species, Little Brown Bat (Myotis lucifugus) and Northern Myotis (Myotis septentrionalis) were detected during passive acoustic surveys in 2019 (Appendix 9- b). These species are listed as Endangered by COSEWIC and SARA schedule. Despite being present, bats were completely excluded from the EIS. Areas that will be cleared for mine development and operations could contain maternity roost trees. Based on Appendix 9-b, this habitat was not adequately evaluated through field surveys. Request/recommendation: a) BNDN requests justification for excluding bat species from the EIS despite two Endangered species confirmed present. b) BNDN also request the Proponent put protocols in place to identify and assess bat maternity roost trees prior to clearing and employ mitigation measures such as retaining maternity roost trees, modifying the timing of clearing, and offsetting for the destruction of habitat for endangered species. See Section 4.5 for additional information on this topic (p. 59-60).	Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS and has been included in the response to YNLR (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been included here as Attachment IR-131. This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bats. As a result of the continued technical review until October 2024, the additional specific commitment has been made: Denison will conduct additional bat baseline surveys prior to commencing any work/activities at the project site. Denison will use the baseline data to verify the EA predictions.
68	BNDN (February 28, 2023)	9 Terrestrial Ecology 9.1.8 Monitoring and Follow-up 9.2.8 Monitoring and Follow-up 9.3.8 Monitoring and Follow-up 9.4.8 Monitoring and Follow-up	Comment #68: Denison's proposed terrestrial ecology mitigations described are generalized and conceptual in the EIS. With the level of detail provided in the EIS, it is not possible for BNDN to comment on the adequacy or effectiveness of the proposed mitigation measures or whether proposed mitigations will meaningfully diminish Project impacts on BNDN rights and interests. Request/recommendation: - BNDN holds invaluable indigenous knowledge related to terrestrial ecology topics including traditional and medicinal plants, ungulates, furbearers, game birds etc. within the RSA. BNDN must be meaningfully involved in the development and implementation of the various management and monitoring plans mentioned throughout Chapter 9 of the EIS to ensure that proposed impacts are sufficiently reduced. These plans include but are not limited to the wildlife monitoring plan, avian monitoring, and Woodland Caribou Management Plan. The role that BNDN will have in developing management and monitoring plans should be defined within a project agreement between BNDN and Denison. See Section 4.5 for additional information on this topic (p. 59-60).	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
69	BNDN (February 28, 2023)	Section 6.0	Comment #69: Denison's air dispersion model does not include any receptor locations related to BNDN traditional land and resources use (TLRU) and Indigenous Knowledge (IK) sites. BNDN members use the lands and waters in the Project area for TLRU and ceremonial purposes. Request/recommendation: - BNDN TLRU and IK sites should be considered in Denison's air quality assessment. The geographic locations for TLRU and IK should be inputted into the air dispersion model as special receptors. This will provide site specific data for BNDN land users who use the LSA so they can effectively assess the Project's impact on land use and rights. See Section 4.6 for additional information on this topic (p. 67-71).	Scoping of the air quality assessment followed a conservative approach and described where modelled concentrations returned to background levels. The air quality assessment included human receptors in the Project Area and Local Study Area (refer to draft EIS, Figure 6.1-3). These receptor locations are consistent with what was presented in the ERA (Section 10.1 and Appendix 10-A).

70	BNDN (February 28, 2023)	Section 6.0	Comment #70: Denison states in the EIS "the Cameco McArthur River Operation and Key Lake sites are currently in Care and Maintenance mode; therefore, there is currently no truck traffic between the sites on Highway 914. When these sites are to become operational again, there is potential for a cumulative effect at sensitive locations near the highway." On November 28th, 2022, operations resumed at Cameco's McArthur River Uranium Mine and Key Lake Mill. Denison did not model Cameco related air emissions in their air dispersion model. The EIS model does not account for any of Cameco's air emissions from the mill, mine, and associated truck traffic between sites. Without this data included in the model, the EIS does not adequately account for the cumulative effects of Cameco's McArthur River Mine and Key Lake Mill on the atmospheric environment. Request/recommendation: - Denison must redo air dispersion modeling to account for the Cameco McArthur River Uranium Mine and Key Lake Mill which have resumed operations since the EIS was released. Without this data included in the model the EIS does not accurately capture baseline conditions or cumulative effects on the atmospheric environment. Fugitive dust and uranium emissions (and potentially other contaminants) have increased potential for exceedances with the resumption of Cameco's operations, as exceedances are already predicted with the Wheeler River Project alone. See Section 4.6 for additional information on this topic (p. 67-71).	Please refer to Section 6.1.3.2 and 6.1.7. The regional SK MOE data presented in Table 6.1-12 were conservatively used to represent background concentrations of TSP, PM10, PM2.5, CO, SO2, and NO2 for the Wheeler River Project air quality assessment. While traffic associated with Cameco Operations was not modelled, conservative regional background concentrations from the Saskatchewan Air Quality Modelling Guideline (SK MOE 2012a) and the La Loche monitoring station were used for particulate matter, NO2, SO2, and CO (see Section 6.1.3.2.5 and Appendix 6-A). The La Loche monitoring station is located near anthropogenic sources, while the Project is in a remote area removed from anthropogenic sources. Accordingly, emissions to air from traffic associated with Cameco's operations are captured by the regional background concentrations used in the air dispersion model and are considered in the assessment of Project-related effects discussed in Section 6.1.4. Model predictions of COPC concentrations and depositions were added to background levels and compared to the available standards summarized in Table 6.1-5 at receptors located outside the property boundary. To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial 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 monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested.
71	BNDN (February 28, 2023)	Section 6.0	Comment #71: The Project is predicted to produce exceedances for TSP of 313% over the regulatory limit. 24-hour TSP concentrations exceed the criterion 28% of the time during Construction, 21% of the time during Operations. These exceedance conditions do not include TSP emissions from Cameco's McArthur River Mine and Key Lake Mill which have now resumed operations. There is also the potential for wildfire smoke to further exacerbate dust emissions. TSP exceedances represent a potential health risk for land users and workers near the Project site. Especially for at-risk groups such as elders, youth, and people with existing respiratory conditions. Request/recommendation: a) Denison must employ additional mitigation measures to reduce TSP emissions on site including enhanced dust suppression efforts. b) Denison must remodel TSP to include emissions from Cameco's McArthur River Mine and Key Lake Mill. c) Please provide information on how TSP will be monitored during the Project and how Denison will know when exceedance conditions are occurring. d) Please provide information on how adaptive management will be used when a TSP exceedance is discovered. Including discussion on how the Project will be managed during poor air quality events caused by wildfire smoke. e) Please provide information on how exceedances conditions near the Project site will be communicated to the public. See Section 4.6 for additional information on this topic (p. 67-71).	a) A change in a measurable parameter is not a significant effect, per the EA methodology outlined in Section 5. This threshold approach is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue. Denison directs BNDN to Table 6.1-19 to 6.1-21 for the complete residual effect characterization for TSP exceedances. This includes a consideration of the residual effect related to TSP in the full context of direction, magnitude, geographic extent, duration, frequency, reversibility, context, and likelihood. In Section 10.1 of the draft EIS, the SMEs concluded that while there were predicted exceedances of air quality criteria for particulate matter, they were not identified for further assessment in the HHRA—these COPCs are unlikely to be associated with a human health or environmental risk, and any exposures to people at elevated concentrations would be infrequent, short-term, and highly localized. b) Please refer to Section 6.1.3.2. The regional SK MOE data presented in Table 6.1-12 were conservatively used to represent background concentrations of TSP, PM10, PM2.5, CO, SO2, and NO2 for the Wheeler River Project air quality assessment. While traffic associated with Cameco Operations was not modelled, conservative regional background concentrations from the Saskatchewan Air Quality Modelling Guideline (SK MOE 2012a) and the La Loche monitoring station were used for particulate matter, NO2, SO2, and CO (see Section 6.1.3.2.5 and Appendix 6-A). The La Loche monitoring station is located near anthropogenic sources, while the Project is in a remote area removed from anthropogenic sources. Accordingly, emissions to air from traffic associated with Cameco's operations are captured by the regional background concentrations used in the air dispersion model and are considered in the assessment of Project-related effects discussed in Section 6.1.4. Model predictions of COPC concentrations and depositions were added to background levels and compared to the available standards summarized in Table 6.1-5 at receptors located outside the property boundary. c) and d) To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial 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 monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested. 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.

				e) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
72	BNDN (February 28, 2023)	Section 6.0	Comment #72: The Project is predicted to produce exceedances for PM10 of 232% over the regulatory limit. 24- hour PM10 concentrations exceed the criterion 17% of the time during Construction, 12% of the time during Operations. These exceedance conditions do not include PM10 emissions from Cameco's McArthur River Mine and Key Lake Mill which have now resumed operations. There is also the potential for wildfire smoke to further exacerbate dust emissions. PM10 exceedances represent a potential health risk for land users and workers near the Project site. Especially for at-risk groups such as elders, youth, and people with existing respiratory conditions. Request/recommendation: a) Denison must employ additional mitigation measures to reduce PM10 emissions on site including enhanced dust suppression efforts. b) Denison must remodel PM10 to include emissions from Cameco's McArthur River Mine and Key Lake Mill. c) Please provide information on how PM10 will be monitored during the Project and how Denison will know when exceedance conditions are occurring. d) Please provide information on how adaptive management will be used when a PM10 exceedance is discovered. Including discussion on how the Project will be managed during poor air quality events caused by wildfire smoke. e) Please provide information on how exceedances conditions near the Project site will be communicated to the public. See Section 4.6 for additional information on this topic (p. 67-71).	a) A change in a measurable parameter is not a significant effect, per the EA methodology outlined in Section 5. This threshold approach is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue. Denison directs BNDN to Table 6.1-22 and 6.1-23 for the complete residual effect characterization for PM10 exceedances. This includes a consideration of the residual effect related to PM10 in the full context of direction, magnitude, geographic extent, duration, frequency, reversibility, context, and likelihood. In Section 10.1 of the draft EIS, the SMEs concluded that while there were predicted exceedances of air quality criteria for particulate matter, they were not identified for further assessment in the HHRA—these COPCs are unlikely to be associated with a human health or environmental risk, and any exposures to people at elevated concentrations would be infrequent, short-term, and highly localized. b) Please refer to Section 6.1.3.2. The regional SK MOE data presented in Table 6.1-12 were conservatively used to represent background concentrations of TSP, PM10, PM2.5, CO, SO2, and NO2 for the Wheeler River Project air quality assessment. While traffic associated with Cameco Operations was not modelled, conservative regional background concentrations from the Saskatchewan Air Quality Modelling Guideline (SK MOE 2012a) and the La Loche monitoring station were used for particulate matter, NO2, SO2, and CO (see Section 6.1.3.2.5 and Appendix 6-A). The La Loche monitoring station is located near anthropogenic sources, while the Project is in a remote area removed from anthropogenic sources. Accordingly, emissions to air from traffic associated with Cameco's operations are captured by the regional background concentrations used in the air dispersion model and are considered in the assessment of Project-related effects discussed in Section 6.1.4. Model predictions of COPC concentrations and depositions were added to background levels and compared to the available standards summarized in Table 6.1-5 at receptors located outside the property boundary. c) and d) To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial 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 monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested. 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. e) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations

				who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
73	BNDN (February 28, 2023)	Section 6.0	Comment #73: The Project is predicted to produce exceedances for uranium of 148% over of the regulatory limit. These exceedance conditions do not include uranium emissions from Cameco's McArthur River Mine and Key Lake Mill which have now resumed operations. Uranium exceedances represent a potential health risk for land users and workers near the Project site. Additionally, uranium deposition in the aquatic and terrestrial environment can cause effect pathways to humans through the food chain through the consumption of edible/medicinal plants, berries, fish, and wildlife. Request/recommendation: a) Denison must employ additional mitigation measures to reduce uranium emissions on site including enhanced scrubber systems and containment measures. b) Denison must remodel uranium to include emissions from Cameco's McArthur River Mine and Key Lake Mill. c) Please provide information on how uranium emissions will be monitored during the Project and how Denison will know when exceedance conditions are occurring. d) Please provide information on how adaptive management will be used when a uranium exceedance is discovered. e) Please provide information on how exceedance conditions near the Project site will be communicated to the public. See Section 4.6 for additional information on this topic (p. 67-71).	a) A change in a measurable parameter is not a significant effect, per the EA methodology outlined in Section 5. This threshold approach is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue. Denison directs BNDN to Table 6.1-27: Air Quality – Summary of the Characteristics Ratings for Residual Effect 9 (Operation, 24-hour Uranium Exceedances) for the complete residual effect characterization. This includes a consideration of the residual effect (24-hour U exceedance during operation) in the full context of direction, magnitude, geographic extent, duration, frequency, reversibility, context, and likelihood. Further, in Section 10.1 of the draft EIS, all relevant radionuclides were assessed in the HHRA in terms of their contribution to the total radiological dose to human and ecological receptors and COPCs identified for air were radionuclides (U-238, U-234 and radon); refer to Table 10.1-7 for a summary of human health exposure pathways. The HHRA estimated dose and risk during all Project phases to the following receptors: camp worker, seasonal resident, recreational fisher/hunter, fisher/trapper. The incremental radiation dose to all human receptors during all Project phases is predicted to be below the regulatory public dose limit of 1 mSv/yr and the dose constraint of 0.3 mSv/yr during all Project phases. Overall, since the radiation dose estimates would be below the public dose limit, no discernable health effects are anticipated due to exposure of these receptors to radioactive releases from the Project. b) Please refer to Section 6.1.3.2. The Key Lake data from camp high volume air samplers from 2009 to 2018 (Table 6.1-13) were selected to represent background concentrations of uranium, arsenic, and nickel for the Wheeler River Project air quality assessment. Model predictions of COPC concentrations and depositions were added to background levels and compared to ambient air quality standards and criteria. c) and d) To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial 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 monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested. e) As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

74	BNDN (February 28, 2023)	Section 6.0	Comment #74: The Saskatchewan MOE Air Quality Modelling Guidelines specifies that the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) should be used for assessments in Saskatchewan. Denison opted to use the CLAMET/CALPUFF dispersion model for the EIS. Request/recommendation: - Please provide additional rationale for the selection of the CALPUFF model over the provincially recommended AERMOD. See Section 4.6 for additional information on this topic (p. 67-71).	As described in Section B.1 of Appendix 6-A, staff at the Saskatchewan Ministry of Environment (Air Quality Branch) were consulted on the selection of CALPUFF and development of the CALMET meteorological data set, beginning in 2019. The CALMET consultation included an initial discussion about the general approach, and once the CALMET runs were completed, two technical memos were produced and reviewed by Ministry staff including: 1) a memo completed in March 2020 summarizing the general CALMET approach and results (e.g., wind roses, temperature data, precipitation data); and 2) a follow-up memo completed in May 2021, which answered specific questions posed by Ministry staff. Ministry staff also completed a review and provided feedback on the CALPUFF model setup in August 2021. The specific rationale for the use of CALPUFF in lieu of AEROMOD as documented in the March 2020 memo was as follows: the domain size needed to generate inputs for the human health and ecological risk assessment (HHERA) is estimated to be 60 km by 60 km. The Saskatchewan Air Modelling Guide recommends CALPUFF for long-range transport (i.e., > 50 km); CALPUFF includes wet and dry removal processes and chemical transformation algorithms that are needed to generate inputs for the HHERA and the terrestrial and aquatic assessments; and, the approach is consistent with other uranium mines in the area.
75	BNDN (February 28, 2023)	Appendix 6-C Climate Baseline and Greenhouse Gas Emissions Report	Comment #75: Carbon dioxide emissions related to air travel for Project personnel were not included in the GHG emissions calculations. Project related emissions from air travel would be significant source due to the remote nature of the site. The GHG emission estimate included in EIS Appendix 6-C does not provide a fulsome representation of Project related GHG emissions. Request/recommendation: - Denison must include emissions from air travel for project personnel in the GHG emissions calculations. This will provide a more accurate representation of project- related GHG emissions. See Section 4.6 for additional information on this topic (p. 67-71).	Assessment of upstream or Scope 3 GHGs under Environment and Climate Change Canada's Strategic Assessment of Climate Change guide are only required for projects that are likely to exceed the upstream threshold of 500 kt of CO2e per year. The upstream GHG emissions for the Project are expected to be well below this threshold (draft EIS Section 2.5) and in the range of 25 to 31 kt of CO2e.
76	BNDN (February 28, 2023)	Section 6.0	Comment #76: Denison acknowledges the Project's contribution to climate change through GHG emissions but does not outline a plan to offset GHG emissions. Other mines in Canada, including the Canadian Malartic Mine in Quebec have GHG offset plans in which carbon emissions are tracked and offsetting activities are developed in collaboration with local First Nations (Canadian Malartic, 2014). Request/recommendation: - Denison must develop a GHG/Carbon offsetting plan to mitigate potential impacts of the Project to climate change. Denison could work with BNDN and other local First Nations on initiatives that help to offset the Project's GHG emissions (e.g. tree planting, wetland restoration, carbon offsets). This would demonstrate a commitment to corporate social responsibility, climate stewardship and reconciliation on Denison's behalf. See Section 4.6 for additional information on this topic (p. 67-71).	Denison anticipates being subject to ECCC's reporting requirements for emitters over 10,000 tonnes CO2e and the information is collected under section 26 of the Canadian Environmental Protection Act. In order to meet these reporting requirement, Denison will be tracking Scope 1 and 2 GHG emissions. Options to offset the Project's GHG emissions will be considered as the Project advances. In draft EIS Section 2.5 Greenhouse Gas Emissions Denison has committed to looking for opportunities to optimize energy management and improve the energy intensity of the Project where practical.
77	BNDN (February 28, 2023)	Section 6.0	Comment #77: The Project is reliant on burning diesel for construction, supplementary power generation, mine processing activities, and mine equipment. The GHG intensive nature of the Project's construction and operation phases are a concern for BNDN and not consistent with federal or provincial directives to reduce GHGs. Cleaner technology and fuel sources are available to reduce the Project's GHG emissions. For a project based around supplying fuel for the energy transition, a more progressive approach that utilizes Best Available Technology is required in order to reduce GHG emissions. Request/recommendation: - Where feasible Denison must implement the use of low carbon technology and fuels in the final Project design to reduce GHG emissions. Specifically, Denison should redesign the Project to: o Replace all diesel electricity generation with LNG/CNG generators (and add in renewables where feasible) for construction phase o Replace all diesel powered mine equipment and vehicles with electric or LNG/CNG models o Use renewable energy sources for electricity generation (e.g. wind, solar) as early in the project lifecycle as possible See Section 4.6 for additional information on this topic (p. 67-71).	Thank you for the comment. The EIS is a planning tool and the details of Project design including use of fuels will be evaluated by Denison as the Project advances. However, we note that in Section 2.5 Greenhouse Gas Emissions of the draft EIS that Denison will look for opportunities to optimize energy management and improve the energy intensity of the Project where practical. In terms of EIS scoping for the basis of effects assessments, Denison took a conservative approach to estimating combustion products use by assuming back-up diesel generators were running continually (worst-case scenario). This is expected to bound actual Project fuel use.

78	BNDN (February 28, 2023)	Section 6.0	Comment #78: Denison does not specify how it will monitor air contaminant concentrations during all phases of the Project. Continuous on-site ambient air monitoring for all COPCs (including particulates, metals, and radon) is the only way to truly assess the Project's impact on air quality and compliance with government standards. Request/recommendation: - Denison must conduct continuous on-site monitoring for all contaminants of concern (including particulates, metals, and radon) in order to assure regulatory compliance and verify the accuracy of air dispersion models and EIS predictions. See Section 4.6 for additional information on this topic (p. 67-71).	To confirm the residual effects of the Project on Air Quality and demonstrate compliance with provincial 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 monitoring requirements directed by provincial and federal regulators and by Indigenous groups and other Interested Parties as requested.
79	BNDN (February 28, 2023)	Section 6.0	Comment #79: Denison does not specify how BNDN will be involved in air quality monitoring during construction, operations and decommissioning phases of the Project. Request/recommendation: a) BNDN requests the implementation of robust and long-term environmental monitoring to verify protection of the environment, including community-led monitoring during Construction and Operations of the Project. b) Denison must develop specific roles and responsibilities to BNDN members in relation to air quality monitoring and site wide environmental monitoring. This should include, at a minimum, one environmental monitor position for BNDN. This would provide increased transparency and confidence to Denison's environmental management practices and performance. See Section 4.6 for additional information on this topic (p. 67-71).	As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. Denison does not anticipate separate funding for BNDN at this time. BNDN will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The details of monitoring and follow-up plans are being developed to support the separate process of Project licensing and permitting. The specific means by which provincial and federal authorities, and Indigenous Nations and communities will be engaged in developing the follow-up and monitoring program, including the information-sharing program, are currently under consideration with the Denison project team. It is noted that Section 4.2.1 of the draft EIS provides the variety of ways in which Denison has engaged with Interested Parties to date and it is assumed it would continue to use these means and others that may be identified to fulfil its key corporate principals for developing positive relationships (see draft EIS Section 4.2).
80	BNDN (February 28, 2023)	Section 2.2.2.2.2 Uranium Bearing Solution Holding Area	Comment #80: The Proponent states that the UBS holding area will have leak detection (Figure 2.2-18). The system is shown as a pipe running under the pond. Request/recommendation: a) BNDN requests more details on the leak detection system used for all ponds shown in Figure 2.2-18. b) BNDN requests that Denison respond to all the following questions in writing: • Is the pipe connected to an automated sensing system? • If not, how frequently is the system monitored? • What chemical or physical indicator(s) are used to detect a leak? • What are the detection limits/thresholds for each indicator? • What is the precision of each indicator? - Who is notified, and how quickly would a response be mobilized? See Section 4.7 for additional information on this topic (p. 77).	It is important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1).Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. The details requested by BNDN will be developed to support licensing and will be included in Management System programs / plans including for example the Groundwater Monitoring Plan and the Emergency Response and Preparedness Plan.
81	BNDN (February 28, 2023)	Section 2.2.2.2.2 Uranium Bearing Solution Holding Area Section 2.2.4.5 Process Precipitate Pond	Comment #81: The Proponent states that the UBS holding area will have leak detection (Figure 2.2-18). The system is shown as a pipe running under the pond. Request/recommendation: - BNDN requests to know what specific containment/restoration methods will be used in the event that a leak is detected, and how quickly they would be implemented. This applies to both the UBS holding area and process precipitate pond. See Section 4.7 for additional information on this topic (p. 77).	It is important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1).Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. The details requested by BNDN will be developed to support licensing and will be included in Management System programs / plans including for example the Groundwater Monitoring Plan and the Emergency Response and Preparedness Plan.

82	BNDN (February 28, 2023)	Section 2.2.2.2.2 Uranium Bearing Solution Holding Area	Comment #82: The Proponent states that the UBS holding area will be designed as a pond contained by a double composite liner system (Figure 2.2- 18), and that options to use tanks instead of holding area will be evaluated as engineering advances. Request/recommendation: - BNDN requests that Denison undertake a risk assessment for the design of the UBS holding area. BNDN recommends the safer, less environmentally risky option be selected and that BNDN can review and provide input into the decision that Denison makes. See Section 4.7 for additional information on this topic (p. 77).	As outlined in draft EIS Section 2.2.2.2.2, Denison will evaluate options to use tanks instead of holding area as engineering advances. It is also important to note that Denison is completing a sequential EA and licensing process for the Project (see draft EIS Section 1). Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. The details requested by BNDN will be developed to support licensing and will be included in Management System programs / plans including for example the Groundwater Monitoring Plan and the Emergency Response and Preparedness Plan.
83	BNDN (February 28, 2023)	Section 2.2.1.4.5	Comment #83: The Proponent states that the wellfield pipelines will be designed to have secondary containment or catchment and have leak detection systems in place at key locations. BNDN requests more details on the leak detection system used for wellfield lines. Specifically, BNDN requests that Denison respond to the following questions: - Is an automated sensing system used? - Will automated controls shut off pressure in the event of a significant leak? - If no automation is used, how frequently is the system monitored? - What chemical or physical indicator(s) are used to detect a leak? - What are the detection limits/thresholds for each indicator? - What is the precision of each indicator? - Who is notified, and how quickly would a response be mobilized? See Section 4.7 for additional information on this topic (p. 77).	Wellfield piping system will transport the mining solution to and from the processing plant. The flow rates and pressures of the individual well lines will be monitored in the pumphouses. 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. The specific details requested by BNDN in this comment are not available at this time and will be developed as part of detailed design to support Project licensing and permitting. Denison considers the EA to be a planning and decision-making tool that assesses the potential effects of the Project in a careful and precautionary manner and integrates results of engagement with Indigenous nations and communities. Denison views the EIS as an important planning tool that will be used to support future activities and represents one stage in the rigorous overall approvals process for a uranium mining facility in Canada. Denison completed feasibility designs for the Project in 2023. The engineering design of the wellfield pipelines including control measures to monitor and respond to leaks will be included in the detailed design information provided to the CNSC during Project licensing.
84	BNDN (February 28, 2023)	Section 2.2.1.4.5 Primary Containment of Mining Solution – Wells	Comment #84: The Proponent states that the well designs and operational monitoring of the wellfield will mitigate accidental release of mining solution or UBS in the sandstone above the mining area Request/recommendation: - BNDN requests to know how Denison will monitor the integrity of wells once in production. Will tests be conducted at regular intervals? See Section 4.7 for additional information on this topic (p. 77).	The well designs and operational monitoring of the wellfield will mitigate accidental release of mining solution or UBS in the sandstone above the mining area. Each well will have double containment: mining solution will travel inside an inner casing with the outer casing acting as secondary containment for the mining fluids. Wells will be continually monitored for operational parameters such as injection pressures, injection flow rates, and recovery flow rates. 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. 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 to do mining zone space creation. 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 devices for pressure and temperature that can detect a breach in the well casing if one were to occur. As a 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.
85	BNDN (February 28, 2023)	Section 2.2.1.4.5 Fuel Storage and Dispensing Facility	Comment #85: The Proponent states that fuels will be stored in approved, above-ground, 25,000 L double-walled storage tank(s) equipped with secondary containment in accordance with provincial regulations and standards. Request/recommendation: - BNDN requests to confirm when the permanent fuel storage facility will be constructed. If temporary fuel storage for construction is required, indicate how much, how it will be stored and dispensed, and show on a sketch where it will be located. Construction fuel requirements for site development may be significant. See Section 4.7 for additional information on this topic (p. 77).	Details on when Denison will construct the permanent fuel storage facility or precisely where temporary fuel storage tanks will be located are not available at this phase of the Project and these details are not required to support EIS review. However, at the EIS stage it is important to note that Denison is committed to construction and operating all fuel storage and distribution infrastructure in accordance with applicable legislative requirements. Fuels will be stored in approved, above-ground, double-walled storage tank(s) equipped with secondary containment in accordance with provincial regulations and standards. In Saskatchewan, the permitting process for hazardous substances including above ground storage tanks for diesel, propane, gas, and jet fuel are governed by The Hazardous Substances and Waste Dangerous Goods Regulations; Environmental Code Chapter E-10.2 Reg 3 (HSWDG). Denison will need to apply for an Approval to Construct, Install, Alter and Expand a Storage Facility and Store Hazardous Substances and/or Waste Dangerous Goods and secure an approval from the Ministry of Environment pursuant to The Environmental Management and Protection Act, 2010, and The

				Hazardous Substances and Waste Dangerous Goods Regulations. Denison will have to adhere to the Terms and Conditions of the approval, complete regular inspections of the facilities, and maintain an Emergency Response Contingency Plan. The Ministry of Environment staff also conduct regular inspections to ensure the conditions of the approval are being followed.
86	BNDN (February 28, 2023)	Section 2.2.4.5 Process Precipitate Pond	Comment #86: The Proponent states that process precipitates may be stored in totes inside the process precipitate pond. Request/recommendation: - BNDN requests details on the procedures for placement and handling of precipitate totes within the pond. Care should be taken to ensure that equipment and totes do not compromise the pond lining. Totes should be sealed and transport of totes from the plant to the pond should be carefully planned to minimize the risk of a spill, and in the event of a spill ensure that runoff is captured on the site. See Section 4.7 for additional information on this topic (p. 77).	The precipitate pond is proposed as a lined area with berms (as shown in Section 2, Figure 2.2-18) and may be more clearly described as being a lined pad. As such, process precipitates can be placed into totes, which can be placed on the lined area ('pond') for containment during storage. Details on the plans for precipitate management, placement and handling will be developed to support Project licensing and permitting. Denison agrees the integrity of the liner and totes are important considerations which will be factors in the plans. We also refer BNDN to the following draft EIS sections and comments responses: - Waste Management: Waste management is described in Section 2.2.4 of the draft EIS and includes discussion of all waste types that will be generated by Project-related activities. The following is noted in Section 2.2.4 for reference, "Conventional waste, radiologically contaminated waste, and hazardous waste will be managed at the Project. 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. A waste management program will be developed for the Project to support licensing and permitting. The waste management program and associated plans developed to support licensing will be based on the 4 R's: Reduce, Reuse, Recycle, and Recover, and will detail how each type of waste generated on site will be managed. Resources used to develop the waste management program will include, but are not limited to, the CNSC's REGDOC-2.11 series, related Canadian Standards Association (CSA) standards, and the Hazardous Substances and Waste Dangerous Goods Regulations (Government of Saskatchewan 2000)." - Water Management: Water management is described in Section 2.2.3 of the draft EIS and includes Denison's commitment to capturing any contact water. 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. Refer to Figure 2.2-17 for runoff collection assumptions. - Emergency Preparedness and Response Program: Please also see Denison's response to BNDN comment 87 below for information on the Emergency Preparedness and Response Program.
87	BNDN (February 28, 2023)	Section 2.8 Project Design Features	Comments #87 and 88: Denison states that they 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 Request/recommendation: - BNDN requests a description of the safety and spill response training programs that employees will undergo. What is the duration of each training program and how often will retraining be conducted? - BNDN requests to know what resources will be kept on site for management and clean- up of spills, for example spill kits, absorbents, neutralization agents, vacuum trucks, PPE, hand tools, etc. See Section 4.7 for additional information on this topic (p. 77).	The details requested related to the Emergency Preparedness and Response Program are being developed to support licensing efforts. The EIS is a planning tool to provide an assessment of the potential Project effects on the human and biophysical environment; at the EIS stage a detailed Management System is not required. A brief description of the Emergency Preparedness and Response Plan is provided in the draft EIS, Section 2.9.1.3.5: and included below for reference. Please also refer to draft EIS, Section 14 Accidents and Malfunctions for an assessment of the potential accidents and malfunctions that could occur in association with the Project and a description of the potential effects on human health or the biophysical environment, considering environmental design features and mitigation measures that would be implemented to reduce such effects. 2.9.1.3.5 Emergency Preparedness and Response Program The Emergency Preparedness and Response Program would identify how the Project will

				prepare for and addresses emergencies that may affect the health and safety of persons, the environment, and the protection of property. The objectives of the program would include the following: • identification of accidents and emergencies and the actions and responsibilities in the event of an emergency; • Project requirements for emergency response equipment and personnel; • internal incident command structure to effectively manage complex, lengthy, and large scale emergencies; • required communications with external emergency services, statutory bodies, and public, Indigenous groups, and regulatory agencies; • development of appropriate emergency procedures; and • assurance of availability of vital information during an emergency. Emergency Preparedness and Response Program would be developed consistent with guidance provided by CNSC in REGDOC-2.10.1, Nuclear Emergency Preparedness and Response.
88	BNDN (February 28, 2023)	Section 2.2.2.2.4 Yellowcake drying and packaging	Comment #89: The Proponent describes various measures used to mitigate yellowcake dust emissions: the yellowcake drying and packaging area will be outfitted with hygiene systems to capture dust generated during the material handling of the yellowcake product and sent to either the dryer or calciner venturi scrubbers. All equipment located after the dewatering of the yellowcake will be selected to provide minimal dust generation and outfitted with dust collection systems where required. The ventilation system in this area of the processing plant will also be adequately designed to provide safety of workers and control fugitive dust emissions. Request/recommendation: - BNDN recommends redundant hygiene systems be installed (n+1 units) to ensure continuity of air filtration in the event of equipment failure. See Section 4.7 for additional information on this topic (p. 77).	Should dust collection systems in the yellowcake drying and packaging area fail and generate a hazard for the workers, the plant will be shut down until repairs are completed. A redundant hygiene system is not economical to implement. Hygiene scrubbers are typically very reliable and can be repaired in short time frames.
89	BNDN (February 28, 2023)	Draft EIS 9.3.5.1 Project Design Measures	Comment #90: The Proponent states that all contaminated areas will be fenced to avoid contact with workers and wildlife. Fences will be monitored and maintained. Request/recommendation: - BNDN requests to know the size and type of fence considered for each project area. - Confirm if the wellfields will be fenced. Show all fences on a site layout drawing like Figure 2.2-1. See Section 4.7 for additional information on this topic (p. 77).	Access to the property will be controlled by both a north and south security gate. In the draft EIS, Denison has committed to fencing the domestic landfill (Section 2.2.4.3.1) and having a fenced storage area near the operations centre. Details on the size and type of fencing are not defined at this stage of the Project, but will meet the criteria outlined in the EIS. The wellfield is not proposed to be fenced. For the wildlife-specific mitigation measures, refer to Section 9.3.5.2.5 Wildlife Deterrence and Prevention of Wildlife Entrapment and Section 9.3.5.2.8 Waste and Hazardous Materials Management.
90	Peter Ballantyne Cree Nation (PBCN) (March 3, 2023)	General	The Wheeler River project falls within PBCN traditional territory, where traditional land use activities have historically been and are currently practiced. PBCN has traditional territory spanning Treaty 10 with the nearest community of Southend located 185km away from the Project. PBCN has exercised aboriginal rights in and around the Project site and currently exercises Indigenous and Treaty Rights in proximity to the Project. PBCN is concerned that the Project has potential adverse environmental, cultural and socio-economic impacts to PBCN members, lands and uses, including hunting, fishing and gathering in all seasons. Both Denison and CNSC indicate that they have fulsome aboriginal engagement policies and guidelines and appear to be undertaking their delegated Crown duty to consult in good faith, as informed by those policies, principles, legal and regulatory requirements. However, there has been an initial error in the assessment, both by Denison and CNSC, as PBCN was erroneously excluded from indigenous engagement, ostensibly due to distance from Wheeler and a lack of understanding of PBCN lands and Indigenous activities potentially impacted by the project. PBCN wishes to participate fully in the regulatory review of the Wheeler River project. PBCN requests that the CNSC ensure that it's review timelines be adjusted, as required, to ensure fulsome participation by PBCN with the proponent and the regulator, going forward. PBCN's goals are to: - Meet with CNSC to share PBCN knowledge of its land, and Indigenous uses, and how these may be impacted by the Project and methods to address any adverse impacts. - Establish a shared understanding of how PBCCN would like to be engaged in the regulatory review, including, but not restricted to, timely project updates, information and an opportunity to discuss concerns throughout the EA process, including the review of the dEIS, CNSC's staff's	Denison followed the criteria identified in CNSC's REGDOC 3.2.2 v 1.2 in determining the Project's Indigenous Communities of Interest. By way of background, Denison has been the operator of the Wheeler River property since 2004, and its predecessors have been in the area since the 1980s. Denison followed a systematic and comprehensive process to identify Indigenous communities who may be impacted by the Project, informed by a wide variety of information, such as the wildlife and fur block management administration areas, existing traditional land use information (particularly information made available through the Key Lake and McArthur River public review processes), access restrictions on Highway 914 north of Key Lake, anticipated impacts to water, anticipated transportation routes, and publicly available descriptions of Indigenous Nations' traditional territories, including that of PBCN. Our approach was further informed by our discussions with those Indigenous Nations with the potential to be adversely effected by Project activities, as well as Indigenous organizations in the region, and supported by information from and interactions with representatives of the Saskatchewan Ministry of Environment (MOE) and Canadian Nuclear Safety Commission (CNSC). 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.

			EA Report, and other project-related documentation [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	
91	PBCN (March 3, 2023)	General	The Wheeler River project falls within PBCN traditional territory, where traditional land use activities have historically been and are currently practiced. PBCN has traditional territory spanning Treaty 10 with the nearest community of Southend located 185km away from the Project. PBCN has exercised aboriginal rights in and around the Project site and currently exercises Indigenous and Treaty Rights in proximity to the Project. PBCN is concerned that the Project has potential adverse environmental, cultural and socio-economic impacts to PBCN members, lands and uses, including hunting, fishing and gathering in all seasons. Both Denison and CNSC indicate that they have fulsome aboriginal engagement policies and guidelines and appear to be undertaking their delegated Crown duty to consult in good faith, as informed by those policies, principles, legal and regulatory requirements. However, there has been an initial error in the assessment, both by Denison and CNSC, as PBCN was erroneously excluded from indigenous engagement, ostensibly due to distance from Wheeler and a lack of understanding of PBCN lands and Indigenous activities potentially impacted by the project. PBCN meets nearly all of Denison's stated criteria to evaluate Indigenous communities located within the Saskatchewan Northern Administration District that would be engaged by Denison. A full and accurate description of PBCN's rights and interests is an essential part of the Wheeler dEIS and is necessary to ensure a fulsome environmental assessment. PBCN is interested in the opportunity to collaborate with Denison mines to comprehensively identify PBCN's rights and interests that may be impacted by the project. PBCN's goals are to: - Work together with Denison in a spirit of mutual respect to cooperate to collectively identify means to avoid, mitigate or otherwise address potential negative impacts of the project on PBCN's territory and the exercise of its Indigenous rights and interests. - Participate in a funding agreement with Denison to facilitate and support PBCN participation and meaningful engagement in the EA process. - Meet with Denison to share PBCN knowledge of its land, and Indigenous uses, and how these may be impacted by the Project and methods to address any adverse impacts. - Explore employment and job opportunities related to the Project. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. Denison has been corresponding with PBCN on these issues and concerns since March of 2023, including written correspondence and an in-person meeting with PBCN on September 20, 2023. We believe that consultation and engagement is an iterative, two-way process, such that as we learn about the Project, its potential impacts, and the interests of Indigenous peoples in the region, we will continue to tailor our approach to engagement. It is in this spirit that we have continued to engage with PBCN to better understand the Nation's interests and land uses in the vicinity of the Project.
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: **• What are the potential impacts to the landscape, including aquatic and terrestrial environments?** • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation?	The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares (for reference, the McIlvenna Bay Project is 1,029 hectares [8 times bigger than Denison's Project]). A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations.

			• What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? **• What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants?** • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? • What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	See above answer regarding the scale of the Project in the landscape. While it is acknowledged that the footprint is not "zero" it is a small footprint on the landscape scale and the assessment of the potential effects of the Project has concluded that the Project will not cause a change in any component of the environment that would alter its status or integrity beyond an acceptable level. Specifically, as it concerns the risk of introduction of contaminants to the environment the following is noted. A Human Health risk Assessment (HHRA) was undertaken for the Project in Section 10. The HHRA evaluated direct exposure to constituents of potential concern (or contaminants) released to air and water, and through indirect exposure to the constituents associated with soil, sediment, and food, such as fish, wildlife, and plants. The assessment was inclusive of information based on use of traditional foods and a specific traditional food diet from ERFN. The overall conclusion of the HHRA was that there would be no significant adverse effects to human health from the Project.
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? **• What are potential accident or spill impacts on the harvesting of plant specific country foods?** • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? • What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	A standalone Accidents and Malfunctions (A&M) assessment was completed and is summarized in Section 14 of the EIS (full report is Appendix 14-A of the EIS). The A&M assessment considered almost 70 accident scenarios including many that would relate to the unplanned release of chemicals and radiation to the environment with potential to effect country foods. Specific scenarios including the release of chemicals and radiation to the aquatic environment and to the terrestrial environment adjacent to the ERFN and KML culture camps located along Hwy 914. The overall risks in consideration of likelihood and consequence were characterized as low. The assessment concluded that with planned engineering / environmental design features, mitigation measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical.

92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? **• Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines?** • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? • What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	Access limitations will be limited to the 169 hectare footprint of the site (for reference, the McIlvenna Bay Project is 1,029 hectares [8 times bigger than Denison's Project]). Access north of the Key Lake Road is already limited to a select number of individuals/resource harvesters, and will remain in place until such a time that the access is changed by other parties. Limitation to Indigenous Land and Resource Use beyond the Project footprint and along Highway 914 are expected to result from Project related traffic. Denison is sensitive to areas of high value to ERFN and KML along Highway 914, and is working with these communities to ensure that appropriate mitigations and restrictions are in place during periods of intensive use, such as community-hosted cultural camps proximal to Highway 914. These, and any other mitigations could be applicable to all users of Highway 914, inclusive of PBCN. Although the known trapper in the Project area is recently deceased, it is understood that similar uses are expected from future ERFN members. When the trapline is transferred, a trapper's compensation agreement with inclusions for loss of commercial income and/or any in-kind support related to access and continued use will be contemplated with the future user (irrespective of their home community).
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? **• How will Denison use freshwater from Whitefish Lake?** • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? • What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	The specific activity of water taking from White Lake to support the mining operation was assessed in Section 8.1.4.2.2 of the EIS. Based on a conservative (i.e., high) estimate of water taking it was estimated that the taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by about 1 cm. These small incremental changes would be beyond the ability of monitoring techniques to practically measure and are much less than the natural variability seen. For these reasons the EIS concluded that these minor incremental changes did not represent a significant adverse effect.
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake?	The Caribou in SK1 are stable. Potential effects on Woodland Caribou were considered in Section 9.3 of the EIS and it was concluded that there would be no significant adverse effects. The full reasoning for that conclusion can be found in the EIS but the conclusion was based on several factors including the small spatial scale of the Project relative to the SK1 range (0.001%), risk of Project-related mortality being below natural variation, and the various mitigations that will be implemented. An initial Draft Caribou Management Plan has been developed, provided to regulators, and this document will be used as a framework to further reduce or mitigate potential Project-related effects. The plan is a living document that will evolve over time in response to the eventual Provincial overall management plan for the SK1 range.

			• What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? • What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? **• How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies?** • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? • What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	Potential effects from the Project on water quality were assessed in Section 8.2 of the EIS and the assessment directly evaluated discharge of effluent from the site using predictive modeling. Water treatment will occur; testing will occur prior to release; and no release will occur if water quality does not meet objectives. The predictive modeling showed that constituent concentrations including radionuclides would be below water quality objectives for the protection of aquatic life (i.e., no effects would be expected) at the outlet of White Lake well upstream of the outflow of the Icelander River to Russel Lake. Since no impact are expected to occur in these areas close to the Project, it can also be concluded that no effects would accrue in areas further downstream in the watershed where contributing sub watersheds are many, many-times the size of the sub watersheds near the Project site. In addition, the HHRA concluded that there would be no human health risks related to the Project for traditional food users in consideration of traditional food uses in relatively close proximity to the Project site. As above, if Project effects are not found in relatively close proximity to the site, there is no risk of Project effects in more downstream areas. Finally, the A&M assessment (see response to Question #8; Section 14 of the EIS) did evaluate unplanned releases of chemicals and radioactivity to the environment. As noted, the assessment concluded that with planned engineering / environmental design features, mitigation measures, and emergency response, as well as implementing industry best practices that the risks to the environment from accidents and malfunctions can be reduced to levels that are as low as reasonably practical.
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? **• What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation?** • What is the proposed means and haul route of yellowcake product to the market? • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	Both the construction and operation camps will operate on a fly-in/out basis, limiting the opportunities for interactions between the workforce and Indigenous communities, as workers will be transported by air directly to the site. Other measures to protect community well-being of people employed on the site include health and wellness programming, life skills programming, employee and family assistance programming, implementing a no drug and alcohol policy on site, and offering culturally sensitive employment policies available to all employees, inclusive of any PBCN members. The assessment of socio-economic impacts of the Project can be found in EIS Part III: Human Environment Assessments which includes Section 10: Human Health, Section 11: Land and Resource Use, Section 12: Quality of Life, and Section 13: Economics.

92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? **• What is the proposed means and haul route of yellowcake product to the market?** • Are there employment or procurement opportunities for PBCN members or Group of Companies? • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	The yellowcake will be transported in industrial containers, in accordance with the Transportation of Dangerous Goods Act. Project-related truck traffic during Construction and Operation (such as surface construction equipment, materials, and drill rigs) is expected to originate from Saskatoon or other southern locations. Project-related traffic originating from the west may travel through Beauval via Highway 165, whereas traffic from the south and east may access Highway 165 via Highway 2. Traffic from Saskatoon would likely use Highway 11 to Prince Albert and Highway 55 to Beauval, then travel via Highway 165. Highways are under the authority of the Saskatchewan Ministry of Highways.
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake? • What are the potential impacts to boreal shield woodland caribou? • How will Denison contain effluent from the mine and manage anticipated downstream impacts? In particularly interconnected waterbodies? • What are the socio-economic impacts of the Project, including vulnerable populations, from construction through operation? • What is the proposed means and haul route of yellowcake product to the market? **• Are there employment or procurement opportunities for PBCN members or Group of Companies?** • How will PBCN be included in the development and execution of long-term environmental effects monitoring and follow-up programs?	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan, inclusive of PBCN communities) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. PBCN businesses would fall in the category of northern Saskatchewan businesses, which would place them in line for second preference if project needs cannot be met within the local study area.
92	PBCN (March 3, 2023)	General	PBCN has concerns regarding potential impacts to Valued Components including but not limited to water quality, fish, wildlife, aquatic vegetation, Human health, country food consumption, resource use, and socio-economic factors. Areas of specific concern are: • What are the potential impacts to the landscape, including aquatic and terrestrial environments? • What are the effects on the growing/carrying capacity of both aquatic and terrestrial environments for Country Foods due to potential changes to the landscape and risk of contaminants? • What are potential accident or spill impacts on the harvesting of plant specific country foods? • Will there be limitations to access lands for country food harvesting due to mining traffic or operation of the mines? • How will Denison use freshwater from Whitefish Lake?	Denison acknowledges PBCN interests in respect of the Project. Detailed monitoring programs to be developed through licensing and this will include how data is going to be reported and shared. The regulators have developed third party monitoring programs and undertake data review on an ongoing basis.

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93	Kineepik Métis Local #9 (KML) and the Northern Village of Pinehouse (NVP) (February 17, 2023)	Water Security Education of In-Situ Recovery and Freeze Wall Technology	Section 1.5 and 3.4 of KML and NVP submission: KML as a community wishes to understand the technical background of water protection processes, the Lixiviant solutions, interactions of chemical compounds with water and toxicity. The KML Community will require this knowledge to have confidence in the continued success of the new mining application on our traditional territories. What are the potential effects to the aquifers and waters around Denison and Wheeler River? KML describes that they need to understand: - how water protection processes such as reverse osmosis and water treatment are used in the mining operations. - the exact molecular compounds that are part of the "Lixiviant" solution - how this chemical compound interacts with water and at what concentrations that is becomes toxic. KML further states: "If these processes are not well understood by our communities, how can we state that we are prior informed and offer consensus to the process?" Ultimately, as noted in their summary of Primary Concerns: 1) There is a need for funding for education and training to reach a standard of knowledge in mining, science and math required to understand the impacts of uranium mining industry that is expected for an Indigenous community to be able to make free and prior informed decision on impact and expectation of that industry. 2) Development of a centre of Excellence in Pinehouse to organically develop the knowledge transference required for Indigenous community to understand the uranium mining industry including regulations, materials used, transportation, end use of products, education required mitigation efforts etc. 3) Support for training and education to support KML and Pinehouse on uses of artificial intelligence in the mining projects and to what level this activity can be managed by and in the community. A strategy to build capacity for matriculation graduates with the following classes English 30A 30B Chemistry 30, Physics 30, Math 30. KML wants to increase the community western education levels so that they are knowledgeable and have the capacity to protect themselves and the environment. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	Denison has estimated a workforce of 300 during the two-year Construction phase and 180 during the Operation phase. Mineral sector positions are typically considered to be higher paying than many other industrial positions. Residents and communities in the LSA (ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Northern Hamlet (Patuanak); Pinehouse Lake, Northern Village; and Beauval, Northern Village) will be given first priority for employment, training, and business opportunities, followed by residents and communities in the RSA (Northern Saskatchewan Administrative District). Mitigation and enhancement measures will be implemented by Denison to enhance the positive effects of the Project on employment and training, income, traditional economy, and business opportunities and minimize adverse effects including: • A Human Resource Development Plan to initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities; • Establishment of a procurement approach through all phases of the Project, focusing on businesses based within the LSA communities, followed by Indigenous and / or businesses in the RSA; • Negotiation with the Province of Saskatchewan to develop the Project's Surface Lease Agreement and Human Resource Development Agreement. See Section 13 for a summary on local, provincial, and federal Project benefits and Denison's approach to employment, training, and business participation opportunities for communities. See Section 13 for information regarding employment, employment opportunities, and career growth for community members. As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible and will continue with ongoing discussions in this regard.
94	KML and NVP (February 17, 2023)	Language and Culture Restitution	Section 2.2 of KML and NVP submission: KML note that loss of language can be correlated to the introduction of the Saskatchewan Uranium Industry. Prior to the industry development, Pinehouse was among the most fluent speaking communities in northern Saskatchewan. All children in Pinehouse spoke Cree with limited English and French capacity. Since the collateral effect of industry became the prominent community discourse the support for Cree language was diminished and marginalized by industry as English is the primary language used by industry. KML and NVP are actively working to determine how to stop the current language extinction process with strategies around creating more resources for culture and language. KML is leading the process for recovering from this loss. KML are using our own source revenue and resources to bring pride in the language and culture for community members of KML. KML will continue to bring this attention to all proponent activities that occur on the KML territory for KML are all are responsible to remove the effects of colonisation and institutional racism.	Denison respects the concern raised by KML regarding language and culture related to working at an industrial operation. Denison and KML will be working on specific items of interest to mitigate these types of concerns through private contractual arrangements, which may include specific mitigation and accommodation measures in this respect. Mitigation measures associated with potential effects to cultural continuity (including knowledge transfer and language) are described in Section 12.1.5 and include: • working 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; • 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 (see Section 11 for a description of potential effects to land use).

				In discussions with Indigenous Communities of Interest since the filing of the draft EIS, it has become apparent that Denison should add additional commitment / mitigation measure in relation to this area of interest, as follows: • Encouragement to speak languages of choice while at site, except during safety sensitive situations. Section 12.1.5 of the final EIS will be updated to include the additional commitment / mitigation measure in relation to culture and language, as follows: • Encouragement to speak languages of choice while at site, except during safety sensitive situations.
95	KML and NVP (February 17, 2023)	Mining methods and education Education of In-Situ Recovery and Freeze Wall Technology	Section 3.1 and 3.4 of KML and NVP submission: KML and NVP must be educated on all aspects of the Denison project to remove limited understanding of the processes that occurred within our traditional territories. They note that they cannot learn how to protect the land if they cannot understand the math and science involved in mining and environmental protection. KML people require higher education levels because of the collateral effect, on their population, caused by industry [which the proposed Wheeler River project adds to]. They further assert that they must understand the technological advantages being employed in the Denison Wheeler River Project. This transference of knowledge can occur through a sustained and supported education program. The community will also require confidence that any environmental incidents are managed in a way that is fully understood by the community. A long term plan would be to develop and build that capacity in the community to manage the incidents and monitor any environmental cleanup processes. They want assurance that the standards being followed and that as a community, KML are able to action a response to mitigate potential environmental impact. This knowledge must become an integral part of the community knowledge and capacity for this project and for uranium exploration and mining in general. As noted in their summary of Primary Concerns, this includes: - Begin training and education support for community to prepare for employment at the mining operations with a focus on females, youth, and previously marginalized land users. Effort to increase employment in trades and drilling related work. See also other related Primary Concerns from Document, #1-3.	See responses to KML and NVP Public Comment #93
96	KML and NVP (February 17, 2023)	Road safety concerns Maintenance of 914 road with 914 Extension	Section 5 and 5.2 of KML and NVP submission: When determining community safety with respect to need for increased transportation for a new operation, the Indigenous people of KML have the following concerns: - The state of the existing road from 165 to 914: The road has received upgrades up to the kilometer 75 on highway 165. From Kilometer 75 to Kilometer 112 where Highway 165 ends and Highway 914 begins, Highway 914 needs an upgrade in width all the way to Pinehouse to create a more industrialized road. KML are not looking forward to the spring road conditions with just the current industry activity. - Every community member has reported near miss incidents with the increased traffic caused by the general resurgence of the Uranium Industry using semi truck and heavy hauls to transport material to the operations and project sites. With the increase in incidents and near misses the opportunity for a major incident is inevitable, with the current road conditions. Adding the development of a new Denison mining operation will only increase this potential for incidents for people using this road. - When you add the rough road conditions, visibility reduction in the winter and summer with dust and snow flurry from large vehicles. This causes unsafe conditions and increases the potential for incidents. - The current capacity for road maintenance from the community members of Pinehouse are not prepared for the additional maintenance requirements for the road becoming a connected road. The road must be developed to an industrial rating to allow for the increase in industrial use so that members of KML do not experience safety issues. KML is requesting that the Transport Canada, Ministry of Highways respond to the concerns of Pinehouse and inform the community of the plans for road infrastructure development. KML would request the road be developed to the standard that the Key Lake and McArthur River road is managed all the way to Junction of Highway 165 and Highway 2. KML and NVP request further capacity to develop road management capacity so KML can provide the support necessary to manage the integrity of the road.	The EIS for the Wheeler River Project was completed with consideration of Project components that include: ISR, Drilling, Freeze Wall, Wellfield, Processing, Water Management, Waste Management, Access and Transportation, Power, Support Facilities, Project Area, Project Activities, Ancillary Projects, GHG Emissions, Project Schedule, Project Benefits, Project Design Features, Management System, and Project Alternatives. Through an alternative means assessment, Denison considered options in relation to access and transportation. The access road alignment will follow part of the existing exploration access road, stream crossing structures will use clear span bridges, and worker transportation will be air transport to a) nearby Cameco operations or, b) a new airstrip constructed and operated by Denison. Denison incorporated the feedback provided on road options select the current road alignment for the Project. See Section 2 of the EIS for information and technical detail pertaining to Project Components and Project alternatives; see also EIS Appendix 2-C for Alternative Means Assessment. Highway improvements are not within Denison's jurisdiction and are not considered in the EIS for the Wheeler River Project. However, Denison notes KML's perspective of increased traffic volumes and subsequent desire for highway improvements. On Highway 914 between Key Lake and Pinehouse, Denison anticipated that road users would see an increase between 16% and 40% over the life of the mine. Trucks travelling on this section of highway will increase from 35 to 53 at peak operational times. 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.

			As also noted in their summary of Primary Concerns, this includes a requirement for: - Immediate efforts to build and increase emergency response capacity with community people from KML and NVP to support capacity for road incidents. - Significant improvements to the road to an industrial grade from Highway 2 to the Key Lake gatehouse to support the massive increase in heavy traffic from Industry [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	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: 1) Assisting KML with the clear identification of the forthcoming culture camp along highway 914 (providing clear signage) 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. See Denison's response to comment #97 for information pertinent to emergency response capabilities. See EIS Section 2, Appendix 2-B for more detail pertaining to traffic volumes.
97	KML and NVP (February 17, 2023)	Emergency Response Services	Section 5.1 of KML and NVP submission: Pinehouse will inherit significant impacts from the transportation of goods and services to the mining operations. Safety of our community member is a paramount concern for the community. KML will be impacted from increased heavy haul traffic and this will impede our ability to hunt for food. KML will also bear the effects of needed emergency services from our community first from the increased need for emergency response, which could dilute the limited emergency response services KML currently are provided. KML will also inherit any future security emergency requirement and expanded exploration and developmental impacts. The expectation is that within the life of the mine the community and industry will co- develop capacity to engage in emergency response including environmental spills, traffic incidents, air traffic incidents, emergency road security, search and rescue, fire fighting, and water rescue. See also other related Primary Concerns from Document, #5.	Denison will establish a Transportation of Dangerous Goods Program, intended to provide for the safe transport of goods by conforming to all applicable laws, regulations, company policies, and procedures. The Transportation of Dangerous Goods Program applies to all modes of transport and all locations where Denison assumes care and control of the materials. 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. Emergency Preparedness and Response Program would be developed consistent with guidance provided by CNSC in REGDOC-2.10.1, Nuclear Emergency Preparedness and Response (CNSC 2016). Increased pressure on emergency services is most likely to stem from an accident or malfunction on Highways 914 or 165. The extent to which these changes could affect any given community would depend on the nature of the accident or malfunction. Accidents and malfunctions for the Project were determined to (generally) have a highly unlikely to unlikely probability of occurrence, with an overall risk rating of low to moderate; however, the severity of accidents and malfunctions was determined to be minor to major. If such an event were to occur, local resources may be called upon to provide support, which may result in a call to fire, RCMP, or ambulance services depending on the nature of the event. Denison will provide any necessary training and/or equipment to local first responders to make sure they are sufficiently prepared to deal with an unlikely accident or malfunction. Denison's objective is to utilize existing emergency response teams from other operations prior to drawing on community-based resources. In the unlikely event that this were to occur, and KML resources were drawn upon, the Agreement negotiated between provides the foundation for discussions in respect of such incidents. See Section 2 for information pertaining to the above programs.
98	KML and NVP (February 17, 2023)	Waste management of new development and historical issues	Section 6.1 of KML and NVP submission: KML is concerned with cumulative impacts from historical legacy exploration and mining practices. Not specific to Denison, Cameco or Orano, KML notes that land users have often found remnants of past poor exploration practices which are now affecting our continued land use. The abandoned camps and industrial and domestic waste left with no known program for clean up are the most significant of these remnants. They would like the EIS to host in partnership with provincial government regulators to host a conversation on progressive reclamation of these legacy sites. This conversation should prioritise the community capacity and an environmental agent for process that occur on our traditional territories. This conversation could include changing the policies of waste (future waste) being brough into the NAD. KML's contention is that waste that is brought into the region should be removed entirely from the region. The need for a regional waste management facility or a transfer station must be developed in partnership with KML. As noted in their summary of Primary Concerns, this includes a requirement for: - Immediate efforts to build capacity in a regional waste management operation within or near the community. To build current and future expertise in domestic waste, special waste, recycling, and the development of a transfer station in Pinehouse to support all mining activity including current operation and exploration.	Denison conducted a cumulative effects assessment, which included the Highway 914 extension project, on categories the Atmospheric and Acoustic Environment; Geology and Groundwater; the Aquatic Environment; the Terrestrial Environment; Human Health; Land and Resource Use; Quality of Life; and Economics. Denison respects and understands KML's concern about the cumulative effects in the region, particularly in relation to access to traditional lands and resources in correlation with industrial and mining developments. The residual effects of the Project are expected to interact with the residual effects of other projects and activities in the ILRU RSA, resulting in potential cumulative effects to Indigenous land use activity in the area. This is largely due to the proposed Highway 914 extension project. See Section 16 for a summary of the cumulative effects assessments for each category above. As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people

			[Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.
99	KML and NVP (February 17, 2023)	Loss of Use and Access to Traditional Lands and Resources	Section 6.2 of KML and NVP submission: While one project or mining operation does not materially affect KML's land use practices, the substantial and growing projects and mineral exploration activity severely limits their ability to practice land use for the region north of Haultain River. KML land users are now experiencing loss of use with some areas leading to complete exclusion for food sovereignty and traditional activities. As an example of this, hunting practices currently use high powered rifles to engage with big game including moose, bear, deer, and caribou in the area. How will Denison ensure the community can continue to practice this method of food gathering in a safe method?	In 2018, KML approached Denison to support a land use mapping initiative in the Project area. The 2018 study builds on existing land use maps, completed in 2011. A verification meeting was held in late 2018 to make sure no geographic data gaps existed and that the results speak for the whole community. In 2022, KML prepared a document to voice their perspectives on Project VCs and to provide a record for EIS development. Based on 12 community engagement sessions and review of the land use maps, KML explained their unique social, cultural, and historical context, expressed a general consensus of support for the Project, and described issues and concerns. See Section 3 for information on IK and LK and how this information was integrated throughout the EIS. See Section 11 for information on how the Project will interact with land and resources including how potential effects will be mitigated.
100	KML and NVP (February 17, 2023)	UNDRIP and TRC Protocols	Section 6.3 of KML and NVP submission: KML sees limited mention that this project has respected the intent of the United Nations Declaration on the Rights of Indigenous People or the Recommendations of the Truth and Reconciliation Commission. There is limited opportunity for this project to review the implications of UNDRIP and TRC and how this project will cause to effect for the Indigenous rights bearing members of Pinehouse. This is not case for other agencies providing information for this project. KML request advocacy to increase education for external agencies on the need to develop greater understanding of UNDRIP and TRC calls to actions. These agencies can be contractors, regulators, and managers within the companies. This process could be developed if the agencies co develop a centre of excellence in Pinehouse. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	Denison respects KMLs perspectives on the matter and understands this is not an industry only prerogative. As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities.
101	KML and NVP (February 17, 2023)	Co-Management, Food Sovereignty and Métis Land Access	Section 6.4 of KML and NVP submission: Potential impacts to KML are from increased development and access to their territory. Current provincial regulation of hunting, fishing, tourism, resources development and increase human traffic will affect and limit our ability to practice our protected rights. Western business with greater acumen may displace economic activity as they note that they are still evolving their understanding of the industry business practices. KML request further study on how current provincial regulations including opportunity for co-management so lessen the impacts from this project and from increased encroachment. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	See response to KML and NVP Public Comment #99. The Agreement negotiated between Denison and KML outlines specific commitments for KML participation in environmental monitoring associated with the Project.
102	KML and NVP (February 17, 2023)	Waste Management Plan	Section 6.5 of KML and NVP submission: Waste generated from the operation, construction and maintenance of mines and exploration projects need to be better understood by the community. KML is of the view that waste management may represent the greatest source of environmental liability arising from this project and the mining industry in northern Saskatchewan in general. KML request that planning for waste management including capacity for Pinehouse to host a waste management company and a transfer station in Pinehouse to be considered. As a community that uses this land for food, shelter and culture KML want the capacity and responsibility to manage waste for this project and the industry in general and prepare for future development. See also other related Primary Concerns from Document, #6.	As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. In terms of building capacity locally for emergency response and waste management, Denison supports KML's vision on these items where it makes sense and is possible. General discussions to continue as part of ongoing dialogue.

103	KML and NVP (February 17, 2023)	Waste Management Plan	Section 6.5 of KML and NVP submission: KML describes Indigenous Economic Leakage and Triggered Response Capacity as concerns: - Indigenous Economic Leakage: the lack of capacity within Indigenous communities like Pinehouse prior to massive development projects like uranium mining operations. No ability in existing community development to capitalize on industrial activity in their areas because of historic colonization and racism. There are limited businesses, stores, materials and infrastructure within community to support and build upon. - Triggered Response Capacity: the respond required by the Indigenous people of KML to meet the need of industry. The community is required to change focus away from Indigenous community needs to focus on the needs of Industry. This includes time to respond to the industrial education, safety protocols, regulatory responses. The need as a community to participate in the Duty to Consult on exploration requests, feasibility studies, Environmental impact studies, negotiate agreements, industry training requirements. All of this removes the community ability for practicing Indigenous cultural activities, less time of Cree language retention. This response increases as the Collateral Effect increase. It is acknowledged by KML that these are factors are exacerbated by an additional mine. As noted in their summary of Primary Concerns, this necessitates: - Systemic increases in the use of services in Pinehouse including COOP store and PBNLP, Pinehouse Housing Corporation, Pinehouse Fishing COOP and Wild Rice, and KML Métis Local to prevent the continuation of Indigenous economic leakage. - Consideration to build industry supporting infrastructure such as warehousing, hotels, bulk fuels parts and mining necessities in Pinehouse to support community development and to stop the Indigenous economic leakage which has occurred over the last 50 years of development. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	See response to KML and NVP Public Comment #102.
Main Area of Concern for ERFN #1			Concern was raised for the use of the more sophisticated CALPUFF modelling package rather than Meteorological Society / Environmental Protection Agency Regulatory Model. Has the province accepted this method as appropriate? Concern is in reference to Section 6.1.4.2.	As described in Section B.1 of Appendix 6-A, staff at the Saskatchewan Ministry of Environment (Air Quality Branch) were consulted on the selection of CALPUFF and development of the CALMET meteorological data set, beginning in 2019. The CALMET consultation included an initial discussion about the general approach, and once the CALMET runs were completed, two technical memos were produced and reviewed by Ministry staff including: 1) a memo completed in March 2020 summarizing the general CALMET approach and results (e.g., wind roses, temperature data, precipitation data); and 2) a follow-up memo completed in May 2021, which answered specific questions posed by Ministry staff. Ministry staff also completed a review and provided feedback on the CALPUFF model setup in August 2021. The specific rationale for the used of CALPUFF in lieu of AEROMOD as documented in the March 2020 memo was as follows: • The domain size needed to generate inputs for the human health and ecological risk assessment (HHERA) is estimated to be 60 km by 60 km. The Saskatchewan Air Modelling Guide recommends CALPUFF for long-range transport (i.e., > 50 km); • CALPUFF includes wet and dry removal processes and chemical transformation algorithms that are needed to generate inputs for the HHERA and the terrestrial and aquatic assessments; and, The approach is consistent with other uranium mines in the area.
Main Area of Concern for ERFN #2			ERFN would like to further understand the progressive remediation of the mining area proposed, including thawing of the freeze wall in phases; it is believed reasonable for ERFN to request the following: i. Engagement between ERFN and Denison Mines throughout the life of the project, specifically pertaining to the remediated / restored solution targets and associated environmental effects monitoring. ii. The EIS appears to only provide the remediated / restored solution targets and the concentration of COCPs following mixing in Whitefish Lake Middle (the basin where impacted groundwater expected to interact with the receiving environment). ERFN requests clarification on the targets and concentrations in the EIS. iii. Alignment of environmental risk assessment updates and review of updates by ERFN prior to execution of progressive mine area remediation phases. iv. Prior to freeze wall thaw, there should be approved progressive decommissioning objectives that are considered conservatively protective of the receiving environment and contingency planning that would allow for continued remediation following freeze wall thaw, if this is deemed necessary by monitoring results. Further, the progressive decommissioning objectives should be considered living and reviewed regularly, as a finalized decommissioning and closure	With respect to: i. Denison has committed to meeting the mining area decommissioning objectives presented in the draft EIS (Table 2.3-3). These were modelled in draft EIS Section 7 with recharge to Whitefish Lake. Refinement of mining area decommissioning objectives is expected as part of updates to the decommissioning plan, which forms the basis of the decommissioning cost estimate and associated financial assurance. The conceptual decommissioning plan (CDP) included in the draft EIS (Section 2.3.3) contains the appropriate level of detail for this stage of the Project and recognizes that the details of the decommissioning plan and the elements thereof (including remediation and restoration targets and monitoring) will evolve and become more detailed and specific as the Project advances. The subsequent iteration of the plan is the preliminary decommissioning plan (PDP) which will be submitted to regulators as part of Project licensing and permitting. The PDP would reflect input that will be solicited from ERFN and others prior to its submission. Finally, prior to executing decommissioning activities, Denison shall prepare and submit a detailed decommissioning plan (DDP) to regulators for acceptance, which builds on the PDP. 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

			plan has not been approved. Concern is in reference to Section 2.3.3.1.1.	that time. To reiterate, as highlighted above, 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. ii. From Denison's response and EIS contents, Denison is committing to no residual effects to groundwater beyond the mining area during operations and during decommissioning activities; nor effects from changes in groundwater to surface water in the vicinity of the project during the same time period. As such, no potential groundwater effects pathway occurs until restored solution targets are achieved and controls isolating the mining area are removed. As interpreted, this would imply that during operations and early decommissioning activities, there will be no measurable change to groundwater outside of the mining area. iii. As recommended, Denison will work with ERFN to align the ERA updates and reviews of those updates as recommended. iv. The narrative posed by the review comments is consistent with Denison's perspective on how the decommissioning process (and therefore development of the decommissioning plan including decommissioning objectives) will be implemented. The reader is further referred to the response to part i provided above that describes the overall progression of the CDP to the DDP. As noted, Denison will engage with ERFN to solicit input during all phases of the process and Project.
Main Area of Concern for ERFN #3			ERFN would like clarification on whether or not start up of backup generators for the injection and recovery wells and IWWTP will be immediate? Is there a concern of loss of mining solution containment because of a power outage? ERFN understands there will be planned period when the IWWTP will be offline, does this planning also encompass unplanned events? ERFN requests commitment from Denison Mines of ongoing engagement pertaining to the development of the wellfield environmental effects monitoring and Emergency Preparedness and Response Plan. Concern is in reference to Section 2.2.6.2.	Electrical service to the Project will be provided via an approximate 5-km extension tap from the existing 138 kV overhead transmission line that runs along Highway 914. Denison expects an average of six outages per year based on information provided by SaskPower. An outage would be anticipated to last a few hours for a given event. As noted in the draft EIS, Denison will have back-up power supply available with diesel generators to supply power to essential services and functions. In the event of a power interruption, essential services would include the processing plant HVAC system and ensuring the power to the processing plant was maintained to provide Denison the overall ability to shutdown the processing plant in a safe manner. While this is happening (i.e., processing plant shut down), the majority of the electrical loads from the generators will be directed to these activities. Once the processing plant is shutdown safely, loads can then be redirected on a priority basis. In terms of the wellfield operation, the inwards hydraulic gradient only needs to be maintained when mining solutions are being injected. In the event of a power interruption, no mining solution injection would be occurring, therefore no UBS recovery would be required for vertical containment as the system would become static. Denison may use the "sit and soak" method in the wellfield as part of routine ISR mining (i.e., no injection or recovery) which essentially provides Denison the ability to store or hold solutions underground. In terms of the freeze wall, the design and nature of the freeze wall means that the integrity of the freeze wall will not change during short-term power outages. Even if a longer outage is envisioned, freeze wall integrity is would not be compromised. Once developed, the freeze wall would take months to thaw. It is also noted that the freeze wall provides tertiary containment of the mining solution / UBS. With regard to unplanned events and/or care and maintenance situations, Denison would manage the wellfield as follows: 1. Provided power is still available to site the UBS can be used as make-up in the mining solution and recirculated into the wellfield in a closed loop system. 2. If power is lost to the site, the well pumps can be shut off with existing mining solution and UBS remaining stagnant within the mining zone. As the mining zone is contained within the freeze wall with the combined absence of pumping/injecting, no hydraulic gradient existing (translating to no flow). As per correspondence dated July 26, 2023, 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.

Main Area of Concern for ERFN #4			It appears that a specific source term for the clean waste rock has not been provided, and that if deemed to need management a liner will be integrated into the pond design and contact water would be sent to the IWWTP. ERFN expects that the material would be non-potential-acid generating and non-potential metal leaching. ERFN is asking for clarification as to what will inform this decision, for example is it that the clean waste rock would not need management if the leachate would meet surface water quality guidelines? Concern in reference to Section 2.2.4.8.	Conceptually, clean waste rock is defined as non-mineralized and non-potentially acid generating (non-PAG) rock. More precise criteria (numeric and/or narrative), and testing program documentation, will be developed as part of the Waste Management Program that will describe the basis for waste rock segregation based on mineralized content and acid generating potential. For further reference the following is noted. “Clean” waste rock (as described above) is expected to comprise clean sandstone cuttings and core. Waste rock from the sandstone will be characterized during construction and operation per the Waste Management Program prior to placement on the clean waste rock pad. Waste rock characterization will be done primarily based on geological and geochemical characteristics though static and kinetic testing, as appropriate, following standard testing guidance to ensure the rock is both non-mineralized and non-PAG. Any waste rock identified as being mineralized or PAG will be stored on the special waste pad. While the draft EIS did not definitely state that a clean waste rock pond would be constructed, Denison has since committed to constructing a single geomembrane lined pond adjacent to the clean waste rock pad to collect contact water. The contact water in the clean waste rock pond will be routed to the process water pond for eventual treatment in the IWWTP and ultimately released to Whitefish Lake.
Main Area of Concern for ERFN #5			In the EIS, there are no details provided in relation to the off-site processing and permanent disposal of the process precipitates. Please clarify whether or not this activity will be encompassed in decommissioning and closure or would this activity potentially occur during operations. As there are processing and disposal options within ERFN Nutsiye-kwi Benéne, ERFN requests commitment from Denison Mines to ongoing engagement pertaining to this component of the operations. Concern in reference to Section 2.2.4.5.	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. At this time it is envisioned that these details will be developed as part of the decommissioning plan updates and will outline the timing for when these assets are removed from the Wheeler River Project site, as well as the regulatory approvals process to which such activities may be subject, including but not necessarily limited to provincial approvals or federal licensing requirements and statutory obligations such as those described in the Transportation of Dangerous Goods Regulations.
Main Area of Concern for ERFN #6			It appears to be stated that during construction contact water discharge to the receiving environment from the Clean Water Rock Pond might be required in the case of upset conditions (e.g., extreme precipitation event). As such, ERFN requests commitment from Denison Mines to ongoing engagement pertaining to development of a Construction Environmental Management Plan, including discharge monitoring and trigger action response planning, as well as having a qualified environmental professional design this plan and/or be present during high-risk construction activities. Concern in reference to Section 8.3.4.2.1 and Section 8.3.4.2.3.	During construction, no effluent is expected to be released to the aquatic environment. As part of both diamond and rotary drilling activities during construction, a centrifuge will be used for separating out solids in order to recycle fluids. Only solid drill cuttings, not wastewater, will be produced and all muds and waters will be recycled as part of the drilling process. Upon completion of a drilling campaign, all remaining mud and water will be stripped of solids, treated with mud zymes to break down polymers, and injected back down into the mineralized horizon. During active drill campaigns clean water will be held in approved tanks. Any contact water stored in the clean waste rock pond during construction will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / licence requirements. It is also important to note that the sequencing of construction activities will occur in a manner that prioritizes water management based on Project execution plans. For instance, construction of the wellfield runoff pond will be prioritized during the early part of construction and it will be able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the clean waste rock pond during construction. Should the volume of water requiring management exceed site infrastructure storage volumes during construction, contingency measures would be available and could include for example use a hydrovac for offsite disposal. More broadly in terms of Project water management pond designs, ponds will be constructed to maintain a minimum freeboard of at least 1.0 m to allow for continued functioning during a probable maximum precipitation (PMP) event. The PMP event used for feasibility engineering designs is 493 mm. The PMP is very conservative as it effectively assumes a full year of precipitation in one event, under both existing and future climate conditions. For comparison, the PMP is well above both the 24-hour maximum precipitation (e.g., 72 mm recorded at Key Lake in 1998) and 1:100, 24 hour return precipitation events (e.g., 88.6 mm for climate change influenced IDF curves). However, in the event that a pond’s design basis is exceeded, emergency spillways will direct excess water away safely as not to compromise the integrity of

				the water management infrastructure. An unplanned event such as a pond exceeding its design capacity will be reported to ERFN in a timely manner per the commitments in the Public Information Program. ERFN's engagement and review of the Environmental Management Program, including the Emergency Preparedness and Response Plan, will be completed in the agreed upon process for such future activities. The program and plans will outline commitments for the construction phase. While details on the plans are not available at this time, Denison welcomes ERFN's input and recognizes the importance of having qualified environmental professionals onsite during construction activities.
Main Area of Concern for ERFN #7			In relation to IWWTP effluent it is stated that discharge will be to a surface waterbody or injected into groundwater via deep well inject. However, the EIS only assesses direct release of 10.1 L/s of effluent to Whitefish Lake during operations and decommissioning. As such, any deviation from this discharge plan would need to be assessed and approved prior to implementation. Concern in reference to Section 8.2.4.1.	Reference to effluent discharge via deep well injection was a typo in the draft EIS and will be removed from Section 8 of the final EIS. Effluent release is to Whitefish Lake only and no deep well injection of effluent is planned.
Main Area of Concern for ERFN #8			Can you provide clarification re: Sulphate and sulphate (Hardness) concentrations provided? It would be anticipated that the screening concentration would change because of hardness, but it is unclear as to why the predicted concentration would increase? Concern in reference to Table 8.2-10.	There was a typographical error in Table 8.2-10 in the draft EIS; the sulphate (hardness) value in column LA-5 Well Mixed (7Q10) should read 63.83 mg/L. Table 8.2-10 is updated in the EIS and also includes the addition of MDMER constituents (these were added to address a comment from the federal review process, IR-114).
Main Area of Concern for ERFN #9			Specifically, the EIS appears to only provide the IWWTP effluent quality and the concentration of COCPs following mixing in Whitefish Lake Middle (the basin where impacted discharge is expected to interact with the receiving environment). As dilution in Whitefish Lake Middle is required to meet guidelines for some COPCs., are chronic toxicity effects possible within the initial dilution zone within the basin including salinity? If yes, what portion of the available habitat would be impacted by elevated levels of COCPs? In relation to the potential for chronic exposure within a dilution zone, ERFN requests engagement as this should be captured within the aquatic effects monitoring. Concern in relation to Section 8.2.4.2.3.	An analysis of near-field effluent mixing was undertaken as part of the EIS, based on discharge to Whitefish Lake through an off-shore multiport diffuser. Simulations were carried under different flow scenarios using CORMIX to assess the size of the mixing zone. In this case, the meaning of "mixing zone" can be used synonymously with "regulatory mixing zone" that is defined as an area (or water volume) where numeric water quality thresholds (i.e., chronic effects thresholds) may be exceeded as long as conditions inducing acute toxicity are prevented. Such a situation (i.e., existence of a regulatory mixing zone) is envisioned by the MDMER (and in fact permitted by statute), as well as the provincial water quality policy framework. The results of effluent mixing analysis predicted that the regulatory mixing zone would be very small under each of the modelled scenarios. It was predicted that constituent concentrations would be equal to or less than their respective water quality objectives (i.e., chronic effects thresholds) within a few meters (up to 5 m) of discharge and by definition those constituent concentrations would be protective of the most sensitive life stage of the most sensitive resident aquatic taxa. Both 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. For reference, at minimum the programs would be designed consistent with and to meet the requirements of the MDMER, as well as provincial operating permits that will be negotiated subsequent to the EA process. Under MDMER, effluent (end of pipe) monitoring would include laboratory-based chemical and biological (acute and sublethal toxicity) measurement and testing (see MDMER Part 2, Division 2 – Effluent Monitoring Conditions). Under MDMER, receiver-based monitoring, including effluent and water quality monitoring studies and biological studies are completed within the framework of the Environmental Effects Monitoring program (MDMER, Schedule 5).

Main Area of Concern for ERFN #10			It would appear that a temperature assessment was not completed for the proposed heated treated effluent discharge line. It is assumed if there is the potential for adverse effect to the receiving environment, discharge limits would be stipulated as a licensing condition. ERFN requests engagement regarding the establishment of effluent discharge limits, as well as finalized remediated/restored solution targets. Section 8.2.4.2.5.	The EIS does consider the potential thermal effects of effluent in Whitefish Lake; please refer to Appendix 8-E Constituent Concentrations and Mixing Zone Assessment Report. Because the effluent holding ponds are outside, Denison anticipates very minimal differences in the temperature of effluent entering the lake versus the lake water itself. Effluent will be discharged to Whitefish Lake via a pipeline and multiport diffuser that will be situated at depth of 3-4 meters depth. The effluent itself will be held in effluent monitoring ponds prior to discharge and maximum effluent temperature is assumed to be 5 degrees Celsius during the winter. Water temperature in Whitefish Lake during ice-cover is expected to be between 3 and 4 degrees Celsius. As such, the effluent may have a temperature difference of between 1 and 2 degrees Celsius in the immediate zone of the diffuser ports. Mixing of the effluent with the receiving water will be nearly instantaneous and over an area of less than 5 m and generally near its depth of discharge (3 to 4 m). As a result, the thermal change within the highly localized mixing zone will be less than a degree Celsius. We note that Denison will be collecting field temperature in effluent samples as part of the requirements under Schedule 3 of the MDMER. Water quality monitoring will also be conducted to meet the requirements of the MDMER and includes recording temperature of water in both exposure (e.g., Whitefish Lake) and reference areas, per MDMER Section 7(1)(b). It is also assumed that similar monitoring requirements would be included within provincial approvals. The above monitoring will allow Denison to test the assumptions made in the EIS and to understand any potential thermal effects of effluent in Whitefish Lake. This level of monitoring is appropriate as a starting point. If based on monitoring data it was evident that the EIS assumptions were not being met the monitoring program would be adapted accordingly. This approach is consistent with Denison's overall approach to its proposed environmental monitoring programs that will incorporate adaptive management.
Main Area of Concern for ERFN #11			Can it be clarified as to whether or not the clear span bridges proposed for stream crossings will be temporary or intended for use throughout the life of the project? There is uncertainty as the DFO Interim Code of Practice for Temporary Stream Crossings, but the use of these crossing doesn't seem to be limited to a limited stage of the life of mine? Concern in reference to Section 8.3.5.	The two clear span bridges proposed at stream crossing locations would be in place for the life of the Project to allow for transportation of staff and contractors between the airstrip and the main Wheeler River Project site. Section 8.3.5 of the draft EIS does list adherence to the Interim Code of Practice for Temporary Stream Crossings as a mitigation measure, as applicable. Denison does not expect this code of practice would apply to the final, constructed clear span bridges, since these are not temporary structures. However, depending on how construction sequencing and logistics proceeds, Denison may use temporary watercourse crossings to access the eastern shores of the streams, as needed. Temporary stream crossings are employed for short term access across a watercourse by construction vehicles when an existing crossing is not available or practical to use. Denison acknowledges that any temporary watercourse crossings, if used, are not intended for prolonged use, per the code of practice.
Main Area of Concern for ERFN #12			What is the rationale for the timeframe (post-closure) criteria in terms of concluding full reversibility of an effect? Table 3-4 of Appendix 10-A indicates that mass flux (mg/s) rates of molybdenum and selenium persist for 1000 years or more following the end of decommissioning. Further, it is our experience that effects to sediment quality would not decrease for some time following cessation of the water quality effects. Concern in reference to Table 8.3-9.	The Section 8.3 assessment related to the Fish and Fish Habitat Valued Component's Key Indicator of surface water quality is focused on the release of treated effluent. As such, the timeframe for the fully reversible rating in Table 8.3-9 is the post-decommissioning period and considers whether or not the residual effect on surface water quality can be reversed once the activity causing the residual effect (i.e., treated effluent release) ceases. Refer to draft EIS, Appendix 10-A, Figure 3-2 for modelled concentrations of COPCs in water, which show COPC concentrations returning to baseline concentrations in the post-decommissioning period. The figure shows the first five years of post-decommissioning and the actual post-decommissioning period extends to a total of 15 years. The "future centuries" scenario evaluates the potential effects post-restoration (i.e., beyond the Project timeline of 0-38 years) and reflects the time period over which the highest constituent concentrations in groundwater are predicted to migrate towards and interact with surface water. The period of time between the cessation of discharge of treated effluent to Whitefish Lake and when remediated solution in the decommissioned mining area migrates to Whitefish Lake is hundreds to thousands of years. To be conservative the future centuries modelling in Appendix 10-A assumed the mass flux from groundwater to Whitefish Lake starts 200 years after the post-decommissioning phase. Between the end of post-decommissioning period and the start of the future centuries, any changes to surface water quality from treated effluent release would be fully reversed (refer to Appendix 10-A, Figure 3-4). The EIS considered the post-

				decommissioning changes through the future centuries assessment which was completed in Appendix 10-A. The predicted maximum concentrations of COPCs in water and sediment during future centuries are shown in Appendix 10-A, Table 3-5. There are no predicted exceedances of water and sediment quality guidelines for any of the COPCs and as such, the future centuries evaluations were not carried through the residual effect characterizations in Section 8. As a result of the continued technical review until October 2024, Denison was requested to further assess copper compared to Federal Environmental Quality Guidelines and the following clarification was made within the EIS: Denison notes one exception for copper where baseline concentrations exceed the FEQG (due to the copper analytical detection limit being equal to the FEQG) and an incremental increase in concentration is predicted such that the predicted copper concentration (0.0006 mg/L) would be greater than the FEQG of 0.0002 mg/L under baseline conditions, indicating a slight increased level of risk to the most sensitive aquatic biota. We expect this exceedance will not persist through future iterations of the future centuries modelling once additional baseline surface water quality data is collected at detectable concentrations.
Main Area of Concern for ERFN #13			There appears to be some uncertainty regarding the benthic invertebrate community and tissue chemistry data provided. Regarding the tissue chemistry, it is understood that baseline data would have been used to evaluate the baseline predicted by the environmental effects assessment, and as such questions regarding the ERA sampling program may not affect the outcome of the assessment. However, having a robust baseline in terms of benthic invertebrate community composition and abundance would be required to complete a before-and-control-impact assessment (pre and post operations). It is our experience that benthic invertebrate community composition and relative abundance are sensitive end point to changes in aqueous and sediment metal concentrations. If changes are observed above those predicted in the EIS, the first area of investigation would be metal speciation and contaminant bioaccumulation in the organisms. Concern in reference to Section 8.4.3.2.5 and Table 8.4-4.	For clarity, in the ERA model (Appendix 10-A) the benthic invertebrate tissue chemistry predictions shown are modelled values based on exposure to surface water and sediment in consideration of Project-related releases to the aquatic environment and appropriate bioaccumulation factors. The measured baseline benthic invertebrate chemistry was not used specifically within the ERA, but the ERA was informed by the measured data in that the baseline data were used to validate the model predictions. Generally, there was reasonable agreement for many parameters though some constituent concentrations were either over- or underestimated by the model. The model predictions will be updated as part of routine ERA updates throughout the life of the Project. Additionally, the model predictions will be compared to measured benthic invertebrate tissue chemistry collected as part of monitoring programs. The overall objective of this process is to continue to gain a better understanding of potential risks associated with the Project as more operational data are generated and reduce the uncertainty related to estimating such risks. A very brief overview of the benthic invertebrate data collected as part of the environment baseline characterization is shared below for reference. Benthic invertebrate samples were collected in 2016 at ten lake locations and a total of 78 benthic invertebrate taxa from 38 major taxonomic groups (Families) were identified within the study area (Appendix 8-D). Chironomids were prevalent across the study area and were the most numerically dominant taxon at most locations. Other taxonomic groups that represented more than 10% of the total benthic invertebrate density at a sampling location were detritus worms (Naididae), pill clams (Pisidiidae), water fleas from the families Holopedidae and Macrothricidae, and phantom midges (Chaoboridae). From a feeding group perspective, predatory taxa and those that feed on fine particulate organic matter (collector-gatherers) were generally the most abundant groups in lakes within the study area. As alluded to in the review comment, benthic invertebrates will be utilized to assess potential effects related to the Project, and in particular those that may be associated with the discharge of effluent. As such, and also as noted in the review comment a “robust” baseline data set is needed to evaluate such effects. The baseline benthic invertebrate collections made in areas relevant to assessing the potential effects of effluent discharge were sampled with rigour (i.e., sample replication and processing methodology) consistent with the federal EEM program requirements, and therefore in that regard meet the robustness test and can be used to help define the before condition in the Before After Control Impact (“BACI” – described #39) framework. Moving forward (that is in the operations phase of the Project), benthic invertebrate community sampling will be implement though the site’s EEM program and, at minimum, would be completed in a manner consistent with MDMER requirements. Sampling would focus on upstream reference areas and downstream effluent exposed areas and would be statistically based to ensure an appropriate level of statistical power is provided to determine whether there are mine-related effects, or not. Endpoints that would be measured include density, richness, evenness and community composition (via the B-C Index).

				The above does not preclude the execution of a further before operations benthic invertebrate community sampling program that would further define the before condition in the BACI framework. Such considerations are in the early planning stages and will be considered in the next stage of EMS documentation whereby plans and procedures are developed. As previously indicated Denison is committed to involving ERFN in development of those plans.
Main Area of Concern for ERFN #14			It is stated that pre-constructed listed plant surveys / breeding bird surveys would be required on the final project footprint with ecosites that were not sampled in 2017; however, it is ERFN's understanding from the June 22nd site tour that almost all of the footprint has already been disturbed. Were preconstruction surveys completed prior to clearing activities? Concern in relation to Section 9.1.1.1 and Section 9.4.3.	The commitments made in the EIS, including those related to pre-construction surveys, are applicable to the Project as it advances to the Project development phase. Any forest clearing completed by Denison to date was done in accordance with the Saskatchewan mineral exploration guidelines and permitted through Saskatchewan Ministry of Environment, Lands Branch as part of exploration activities. While some limited areas above the Phoenix uranium deposit and trails have been cleared in previous years to access the site as part of exploration activities, the majority of the proposed Project Area has not been cleared. For example, the footprints of the proposed airstrip, camp, processing plant, borrow area, landfills, and portions of the access roads within the Project Area are undisturbed areas consisting primarily of upland jack pine ecosites. Please refer to draft EIS Figure 9.2-6: Vegetation Communities and Ecosystems within the Project Study Areas for a visual representation of the current anthropogenic disturbance within the Project Area. The current anthropogenic disturbance in the Project Area is approximately 24.8 hectares which represents less than 15% of the total Project Area (169.6 ha) (refer to draft EIS table 9.4-20 Summary of Available Common Nighthawk Habitat, Direct Habitat Loss, and Habitat Alteration in the Study Areas).
Main Area of Concern for ERFN #15			ERFN is looking for commitment later in the permitting phase to discuss the development and monitoring of key indicators (KIs) for community health and wellness that reflect the perspectives of community members within the region. Firstly, it is recommended that human health evaluation efforts and KIs / measurement endpoints be reviewed and consider expanding to encompass directly the health of Patuanak/Wapachewunak community members and perceived risks. This may not be required to finalize the EIS as we understand the Human Health Conceptual Site Model based on fisher/trapper on Whitefish Lake and post-closure permanent resident on Whitefish Lake, however, it would be valuable to addressing concerns throughout the life of the project. For example, continued engagement with ERFN communities has identified that regardless of historical radiation protection performance, country food monitoring results and mine/mill personnel health monitoring, community member still believe that uranium mining contributes to cancer rates in community members. Perhaps a community specific KI could be developed and monitored (e.g., a limited uranium testing program looking at levels in ERFN residents on reserve versus off reserve). Further, local scale economy and wellness KIs could be proposed that reflect community members perspectives (e.g., local traffic rates / accidents and community quality of life and income disparity). Concern in relation to Section 10.1.1.2, Section 10.1.1.3, Section 10.1.3.2, Section 12.1.1.2, and Section 12.1.6	As noted in the draft EIS, Section 10.1.8 monitoring will focus on collecting data to verify ERA model predictions as well as provide data to improve model predictions as the Project begins, with the goal of reducing uncertainty over time. It is expected this will be an iterative process, and will be approached in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. The environmental monitoring program is anticipated to include air emissions, surface water, sediment, soil samples, fish tissue sampling, benthic invertebrate tissue sampling, and country food sampling. Monitoring is currently anticipated on Whitefish Lake, McGowan Lake and Russell Lake, and could be expanded based on the interests of ERFN. Although no specific monitoring is currently anticipated with regards to the Cultural Expression VC (Section 12.1.8) follow-up programs for the EIS are proposed to address any uncertainties identified during the EA process. Denison is committed to working with ERFN to understand how this might be executed at the community level to address community perspectives.
104	English River First Nation (ERFN) (February 22, 2023)	Section 6.1.1.2.3 Other Guidelines and Standards	Comment #ERFN-001: Background radon concentrations were used for predicted concentrations for the Project without an appropriate rationale for why CNSC criteria are not used. Question/Recommendation: Provide rationale why background radon concentrations were used in favour of air quality emissions standards/criteria from CNSC for predicted radon concentrations from the Project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

105	ERFN (February 22, 2023)	Section 6.1.1.3 Spatial and Temporal Boundaries	Comment #ERFN-002: For simplicity, a single criterion and time-averaging period were selected for each COPC based on the most stringent criteria or standard presented (federal/provincial). Time period effects are expected to occur in relation to project phases and activities (scenarios), and that the prediction of effects are applicable to/driven by MPs and air quality criteria (1-hour, and 24-hour – short term emissions; and, 30-day, and annual averaging periods). Average compositions from dust fall data during baseline studies was limited to two sampling events (September and October 2021) and presented as a percentage of fixed dust fall – the lowest average of measurable concentrations was used to represent background levels. Question/Recommendation: The AQ modelling assumptions used for the Project are heavily reliant on conversion calculations and average baseline measurable concentrations from passive monitoring methods, instead of a more conservative approach using maximum measurable concentrations. Denison iterates that maximum concentrations for each scenario were extracted from modelling results and compared to criteria to determine effects; however, for dust fall, the lowest average measurable baseline concentrations were used to represent background levels in the modelling.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
106	ERFN (February 22, 2023)	Section 6.1.1.2.4 Summary of Assessment Criteria (KIs and MPs) Section 6.1.3.2 Existing Environment Air Quality	Comment #ERFN-003: As KIs associated with the Air Quality VC pertain to levels of dust, combustion products, uranium, metals, and/or radionuclides; passive monitoring methods (commenced in 2016) were used to characterize the baseline air quality for the Project (included particulate matter [dust fall], NO2, SO2, radon, and external gamma). Provincial regional background concentrations were used for TSP, PM10, PM 2.5, NO2, SO2, CO; while Key Lake ECCC background data were used to represent concentrations of uranium, arsenic, and nickel; and Cigar Lake data were used for copper, lead, selenium, and zinc background concentrations. Question/Recommendation: Passive methods represent averaged concentrations for deployment periods, and in some cases are not directly comparable to the regulatory criteria identified in Table 6.1-5. Conversion calculations were used on the passive monitoring data to compare the minimum requirements of averaged baseline results gathered, against identified provincial/federal criteria for use in modelling effects for the Project. Only predicted short- term (less than 3 years) and medium-term exceedances of modelled COPC concentrations of TSP, PM10, uranium (24- hour), and NO2 (1- hour) to exceed air quality criteria at receptors located outside of the Property Boundary (6.1.4.2); however, as per the Saskatchewan Air Quality Modelling Guideline (SK MOE 2012), the eight highest 1- hour predictions and the single highest 24-hour prediction at each receptor can be discarded.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
107	ERFN (February 22, 2023)	Section 6.1.1.2.4 Summary of Assessment Criteria (KIs and MPs) Section 6.1.3.2 Existing Environment Air Quality	Comment #ERFN-004: Table 6.1-15 shows 24-hour Arsenic concentrations met criteria established in Table 6.1-5 for background level comparisons (0.003 µg/m^3 - used conversion calculation due to passive sampling techniques used for baseline). Question/Recommendation: The EIS lacks clarity with respect to COPCs, as there was no discussion on the effects of 24-hour Arsenic concentrations meeting established criteria, nor was rationale included for the addition of Zinc as a COPC.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
108	ERFN (February 22, 2023)	Section 6.1.3.2.7 Adopted Background Considerations	Comment #ERFN-005: Ontario criteria for uranium in PM10 were conservatively selected as the Project criteria although particle size information for ISR stacks (main source of Project uranium emissions) remains unknown. Input data to run the dispersion modelling included meteorological data from one year (2016 - minimum under guidelines). Question/Recommendation: Information is lacking on how uranium emissions can be mitigated if ISR plant stacks demonstrate particle sizes other than inhalable particulate matter (i.e., respirable particulate matter [PM2.5] levels). Adjustments and refinements to the modelling and thus conclusions were made, heavily based on assumptions.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

109	ERFN (February 22, 2023)	Section 6.1.3.1 Climate (Existing Environment) Section 6.1.7.1 Climate Change Considerations (Cumulative Effects)	Comment #ERFN-006: Climate considerations within the EIS do not address the potential for permafrost in the project area or potential disruption of permafrost by the Project (i.e., contributing GHG emissions directly and indirectly related to the project or as it relates to climate change). Question/Recommendation: Update Section 6 to include permafrost implications from interactions with the Project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
110	ERFN (February 22, 2023)	Section 6.1.3.1 Climate (Existing Environment)	Comment #ERFN-007: Baseline wind direction blowing predominantly from the west (~10%), followed by south and east directions (Appendix 6-C) with an average wind speed of 3.5 m/s. Proponent doesn't demonstrate relative maximums and minimums of wind speed over the averaging periods and wind data are not available for the climate normal period or from baseline studies for comparison and integration into project design/seasonal mitigations. Question/Recommendation: Update baseline information to reflect seasonal wind speed maximums and minimums and integrate it into mitigations.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
111	ERFN (February 22, 2023)	Section 6.1.4.2 Potential Project-Related Effects	Comment #ERFN-008: "The propagation of air emissions from Project activities associated with Construction, Operation, and Decommissioning was predicted using version 7 of the CALMET/CALPUFF modelling package (Exponent 2015). … While the Saskatchewan Air Quality Modelling Guideline identifies that the American Meteorological Society/Environmental Protection Agency Regulatory Model (AERMOD) should be used for most assessments in Saskatchewan, Section 3.3 of the guideline does allow for the use of more sophisticated models, including CALPUFF, where justified (SK MOE 2012a)." (pp. 6-30) Question/Recommendation: From the Saskatchewan Air Quality Monitoring Guideline (Section 3.3) "The use of specialized models [CALPUFF] requires consultation… [and] maybe approved by the ministry on a case-by-case basis. This justification should clearly state the reasons why the approved models are not appropriate…" (SKMOE 2012). Provide a rationale for why the approved models were not appropriate based on the limited meteorological dataset available.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
112	ERFN (February 22, 2023)	Section 6.1.5 Mitigation Measures	Comment #ERFN-009: Additional mitigation measures include the use of chemical dust suppressants to address Air Quality. Denison does not provide evidence discussing the potential impacts on Air Quality from the use of chemical dust suppressants. Question/Recommendation: ERFN requests that Denison provide discussion regarding the potential impacts of using chemical suppressants to mitigate dust including whether there are there any risks to air quality associated with the chemical suppressants themselves.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
113	ERFN (February 22, 2023)	Section 6.1.6.2 Significance and Confidence (Residual Effects Evaluation)	Comment #ERFN-010: Denison states that a gap analysis memo and model input summary was prepared as part of the draft EIS. The memo appears to be missing from the EIS appendices. Question/Recommendation: Please either provide ERFN with the memo or clearly indicate where in the appendices this information is available.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

114	ERFN (February 22, 2023)	Section 6.2.3.1 Baseline Noise Measurement Program (Existing Environment)	Comment #ERFN-011: Baseline data are not sufficient to support the assessment of noise impacts. Data were only collected for 2 locations during 1 week in May 2021 and did not include a portion of Highway 914 (like atmospheric component and identified traffic impacts from Project Activities). Unrepresentative data (meteorological events – temperature, relative humidity, precipitation, wind speed) were removed prior to summarization (14 hours, or 7.5% of measurement data). One of the two monitoring locations was disturbed during the monitoring period and these data were also discarded in the analysis. Question/Recommendation: Denison must provide further baseline information to support sound level criteria conclusions, project level-, residual-, and cumulative effects evaluations for modelling that links noise receptors with other VCs; as compliance determination is based on baseline measurements. Noise significance determination for receptor VCs may not be representative of actual conditions. Per the EIS, "based on professional experience, the SK MOE has considered the Alberta Directive 038 (AER 2013) as a suitable stand in for provincial guidance…" Please clarify how the current baseline data collection for noise aligns with this recommended guidance.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
115	ERFN (February 22, 2023)	Section 2.3.3.1.1 Mining Area Remediation	Comment #ERFN-012: Section 2.3.3.1.1 states that "the mining area decommissioning objectives have been developed through groundwater modelling work and are achievable based on metallurgical testing." Section 7.6.2.1 refers to decommissioning objectives. The objectives are not appropriate for environmental protection. Table 2.3-3 decommissioning objectives portrays water quality that represents a substantial environmental risk and would need generations of monitoring to assess migration of this highly impacted plume. pH 4 is highly acidic and metal/radiation levels are concerning (200 Bq/l radium is 200 to 1,000 times over safe limits). For species where baseline levels are higher than safe levels, baseline levels should be used a target. Question/Recommendation: (i) Further effort should be taken to define the remediation goals that are achievable with best available technology and a commitment should be made to remediate to the maximum extent possible(until baseline levels are reached or the water is deemed suitable with no risk or need to monitor further). Funds spent to remediate will reduce the need for multi- generational monitoring and an unreasonable burden and risk on future generations (to monitor for a very long period of time). (ii) An options assessment for decommissioning objectives should be conducted based on Best Available Technologies (BAT) for treatment of contaminated groundwater and non-degradation approaches for the decommissioning objectives. Consultation on decommissioning objectives is required. Please revise the project closure plan to reflect updated decommissioning objectives. Also noted in Appendix B, Comment #1 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
116	ERFN (February 22, 2023)	Section 2.3.3.1.1 Mining Area Remediation	Comment #ERFN-013: To determine groundwater targets for decommissioning, the levels for groundwater protection from contaminated sites should be used for this project. This would involve use of typical numerical standards rather than the risk-based approach used in the EIS. A minimum level of protection is to define baseline groundwater levels where baseline is greater than water quality guidelines for groundwater. It is acceptable to use the higher value as the target, with baseline being defined as 95% background. Question/Recommendation: As a point of reference, any groundwater decommissioning objective should be compared to the 95% background levels and/or numerical groundwater standards for contaminated sites at the depth of impact compared. Also noted in Appendix B, Comment #2 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

117	ERFN (February 22, 2023)	Section 2.3.3.1.1 Mining Area Remediation	Comment #ERFN-014: Over the course of the project, a certain mass of acid will be added into solutions for injection into the formation. Use of peroxide/ferric may indirectly add acid load via oxidation of sulphide minerals or other oxidation-reduction reactions. Some of the acid used in the project will be neutralized on surface as part of water treatment and discharge. The difference between total acid added to the formation and acid neutralized on surface through treatment represents the net acid load added to the formation and left underground. The EIS describes one mitigation for the leach area as being pumping alkali solution (i.e. caustic) into the leach formation to neutralize residual acid. Question/Recommendation: The mass load of alkali used during decommissioning should be commensurate with the net acid load added to the formation throughout the Project. Mitigation planning along these lines is recommended for consideration to support development of more environmentally responsible decommissioning targets. Also noted in Appendix B, Comment #3 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
118	ERFN (February 22, 2023)	Section 2.3.3.1.1 Mining Area Remediation	Comment #ERFN-015: Section2.3.3.1.1 on decommissioning and remediation of the mine area is vague and should be expanded. For example, certain reagents “may” be used, freshwater will be mixed with contaminated water as a remediation method, and remediation plans will be further refined. Question/Recommendation: Without prejudice to previous comments on the suitability of proposed decommissioning objectives(i.e. Table 2.3-3), the EIS requires a more specific plan on how decommissioning objectives will be achieved and how remediation targets will be assessed to be met. Also noted in Appendix B, Comment #4 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
119	ERFN (February 22, 2023)	Section 2.3.3.1.1 Mining Area Remediation	Comment #ERFN-016: To be able to plan for decommissioning, it is essential that targets developed now, at the EIS stage. Otherwise, the project could be unacceptable to communities in the long term and there is no recourse. Question/Recommendation: Mitigation planning to meet the closure targets must be outlined conceptually so that bonding can be put in place to ensure the targets are met and the project is acceptable. With that in mind, development of targets and an approach to achieve these targets is required at the EIS level and should not be deferred. Also noted in Appendix B, Comment #5 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
120	ERFN (February 22, 2023)	Section 2.3.3.1.1 Mining Area Remediation	Comment #ERFN-017: The EIS states that the freeze wall will be allowed to thaw once recovered water meets the proposed mining decommissioning groundwater quality objectives and has been demonstrated to be "stable over sufficient time.” The freeze wall should be maintained until there is no longer a groundwater plume. It is not environmentally responsible to leave the risk in the ground to monitor for many generations with the optimistic assumption that such a plume will not reach receiving environments. There is no precedent in Canada for the approach of purposefully leaving heavily impacted mine water injected underground with the expectation that it will not reach surface water. Modelling of such a plume is inherently uncertain and the highly impacted water represents a significant environmental hazard/liability. Question/Recommendation: (i) The approach should be to fully mitigate the groundwater zone impacted until the targets are reached. The stress on communities is too high if a groundwater plume of acidity is left in the ground. Adequate neutralization is critical for the groundwater impact zone so that a plume does not develop. Similar to regulation of contaminated sites source areas and plumes, the site is not remediated until it meets this standard of care. (ii) It is unclear from the EIS how it will be determined that the freeze wall is no longer required at the site. ERFN must be engaged indecision-making for thawing of the freeze wall after Decommissioning objectives have been met. Also noted in Appendix B, Comment #6 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

121	ERFN (February 22, 2023)	Section 7.8.2.2.4 Post-Decommissioning	Comment #ERFN-018: Section 7.8.2.2.4 groundwater monitoring, post-decommissioning outlines that monitoring will continue indefinitely, until "transfer of the site into the provincial institutional control program." This ongoing monitoring requirement and stress on communities and ongoing governance should be avoided or minimized to the extent possible by increasing the amount of remediation of the fluids to background levels. Purposely avoiding remediation efforts by passing the responsibility to ongoing monitoring adds significant uncertainty about whether objectives will be achieved, and should further mitigation be required, funds for execution would not be available from the closed project. Question/Recommendation: Monitoring should be done as a last approach after all efforts have been made to maximize remediation and minimize/remove the groundwater plume. For this project, the timelines and risks are too great to avoid mitigation measure for source control. The freeze wall, remediation pumping and treatment should continue until no further improvements are possible or targets are reached that reduce the need for long-term plume monitoring. Also noted in Appendix B, Comment #7 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
122	ERFN (February 22, 2023)	Section 7.8.2.2.3 - Decommissioning Operation; Figure 7.8-2	Comment #ERFN-019: Please clarify what changes to the groundwater monitoring network established during Operations will be anticipated during Decommissioning, including potential pathways of water from the mine site to the receiving environment. Figure 7.8-2 on PDF p. 618 of the EIS is meant to illustrate the conceptual groundwater monitoring network during Decommissioning; however the figure does not show the proposed monitoring locations. Question/Recommendation: A conceptual map similar to Figure 7.8-1 would be valuable and aid ERFN in determining the adequacy of the monitoring network and assessing potential impacts to important water courses. Also noted in Appendix B, Comment #8 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
123	ERFN (February 22, 2023)	Section 7.8.2.2.3 Decommissioning	Comment #ERFN-020: The EIS mentions progressive reclamation in general terms. Question/Recommendation: The concept of progressive reclamation is recommended to be applied to remediation of groundwater in the different zones of the leach field after leaching of the zone is complete. For example, progressive reclamation/remediation of the Phase 1 and 3 could be started while leaching of Phase 4 and 5 is underway. Also noted in Appendix B, Comment #9 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
124	ERFN (February 22, 2023)	EIS Section 2.2.1.4.6 Mining Solution	Comment #ERFN-021: The way water recycle is discussed and assessed in the EIS is inconsistent. Section 2.2.1.4.6 states "once [Uranium Bearing Solution] UBS is recovered to surface, it will be pumped from the wellfield into the processing plant where uranium will be removed from the UBS (Section 2.2.2). The treated solution created can be refortified with reagents as required and pumped back into the mining area to maximize water recycling during the life of the mine. No water recycling has been included in the water balances, although it is expected to occur." Similarly, Section 2.2.3 states, "Denison intends to recycle process water to the greatest extent possible, thereby reducing the demand for freshwater supply and volume of treated effluent. To develop a conservative assessment basis for the EA, the water recycled flows from the industrial wastewater treatment plant back into the processing plant and wellfield have not been incorporated into the estimates for freshwater withdrawal and treated effluent discharge." All models must be updated to include the operational strategy employed by Denison and actual conditions to occur during operations as best as possible. From the perspective of fresh water withdrawal from the environment, evaluating the project water balance with the assumption that no water is recycled is conservative. However, from a water management and water treatment perspective the opposite is true as use of water recycle reduces risks by reducing the total amount of solution requiring management, reducing the rate of discharge of treated effluent and associated contaminant load going to Whitefish Lake. Question/Recommendation: (i) The EIS should incorporate assessment of water recycling into a separate case for the water balance/water quality model (similar to the way base/upper case modeling is used for other phenomenon). The EIS should discuss limits of water recycling, such as the minimum amount of water required to operate the project or the potential for contaminant accumulation in leachate	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			that prevents effective recycle. (ii) Further, recycling all or portion of the process water may increase the concentration of contaminants reporting to the IWWTP and may impact the effluent quality achievable. Accumulation of contaminants in the recycled solution and its impact on the performance of the IWWTP and effluent quality must be assessed and discussed. Incorporating water recycle may reduce the amount of process water requiring treatment and discharge and so may help ameliorate the concern with the high salinity of treated water. Also noted in Appendix B, Comment #10 (Source Environmental Associates).	
125	ERFN (February 22, 2023)	Section 2 General	Comment #ERFN-022: The EIS describes several water storage ponds on surface including precipitate ponds and process water ponds. The design basis for these ponds in terms of how much solution storage is required is not clear in the EIS. Question/Recommendation: The EIS should discuss the sizing basis for these ponds in more detail, including storage capacity for probable-maximum-flood, pond capacity used by precipitate, freeboard volume, and normal operations volume. This should also be discussed in the context of the total amount of solution requiring management at a given time (underground and on surface) and the extent of water recycle achievable. The ability to safely manage process water on surface is a critical mitigation measure for the project and so understanding the design basis for these features is required to assess risk to the environment. Also noted in Appendix B, Comment #11 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
126	ERFN (February 22, 2023)	Section 2.2.2.2.1 Radon Purge Tank	Comment #ERFN-023: Figure 2.2-13, the Processing Plant Overview shows the 5,000 m3 uranium solution holding area would include tanks. This is incongruent with Section 2.2.2.2.1, which states that the UBS holding area will be contained by a double composite liner system with leak detection adjacent to the processing plant and under a fabric tension building system. Question/Recommendation: It is unclear if Figure 2.2-13 shows what is currently being considered for the design. Also noted in Appendix B, Comment #12 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
127	ERFN (February 22, 2023)	Section 7.4.2 Potential Project- related Effects; EIS Section 7.6.1 Life of Mine (0 to 38 years)	Comment #ERFN-024: Section 7.4.2 and section 7.6.2.1 describe scenarios for upward migration of acidic, impacted mining waters and include discussion of upward migration distances of 11 to 50 m. The basis for these scenarios is not made clear in the work and the rationale for why these scenarios are conservative is not sufficient. Upward migration could be a real risk for the project. For example, current and decommissioned boreholes for monitoring could be a pathway for migration of acidic, contaminated fluids to the surface. Question/Recommendation: The EIS should provide a compelling case for the conservatism of the current approach and/or more rigorously assess the impact of substantive upward migration of leach solution. Also noted in Appendix B, Comment #13 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
128	ERFN (February 22, 2023)	Section 2.2.1.3 Freeze Wall	Comment #ERFN-025: Section 2.2.1.3 states “current plans are for the freeze wall 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 (Figure 2.2-6).” This is 20 m smaller than the maximum extent of the area approximated to be influenced by mining around the deposit (50 m). This increases the risk of contaminants leakage from the mining affected area with potentially negative impacts on the receiving environment especially considering that the primary means of containing containment within the leaching zone relies on maintaining an inward hydraulic gradient by recovering more solution than what is being injected (1%). This is subject to planned and unplanned operational downtime due to maintenance or other reasons. Question/Recommendation: Please explain the rationale for the selection of a 30-m thick freeze wall and how it ensures the containment of contaminants as predicted under a variety of different site and mining conditions. Also noted in Appendix B, Comment #14 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

129	ERFN (February 22, 2023)	Section 2.2.1.3.1 Freeze Plant	Comment #ERFN-026: The ammoniacal solution will be used in the freeze plant to maintain the freeze wall in place for the execution of mining activities. Section 2.2.1.3.1 states that "the freeze plant will be designed with ammonia safety in mind to monitor for and minimize risks to workers and the environment from potential leakages." However, no information is provided on potential underground leakages and assessment of potential negative impacts on water quality/balance as well as any appropriate mitigation measures. This is important because as stated in the Application, "the sandstone hosting the uranium deposit is permeable and groundwater can flow horizontally through the deposit." Question/Recommendation: (i) Has the freeze-wall brine been evaluated as a potential source of groundwater contamination? (ii) How would leakage of freeze-wall liquid be detected or assessed? Also noted in Appendix B, Comment #15 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
130	ERFN (February 22, 2023)	Section 2.2.6.2 Back-up Power Supply	Comment #ERFN-027: Section 2.2.6.2 of the EIS states that "to provide electrical service during times of utility outages, diesel generators will be installed to service the site and maintain essential functions. The generators will be used to maintain power to the processing plant and the camp, as well as to maintain other essential services as required." Given that maintaining the freeze wall as well as a negative water balance in the ISR area are key to the mitigation of environmental impacts, a plan must be developed for maintaining the operation of the ISR pumping and freeze systems during power outages. Question/Recommendation: The EIS should discuss the impact of short term power outages on freeze-wall operation and efficacy and on the water balance associated with solution injection/recovery. Also noted in Appendix B, Comment #16 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
131	ERFN (February 22, 2023)	Section 2.2.3.8 Industrial Wastewater Treatment Plant	Comment #ERFN-028: An important aspect of preventing environmental impacts is the industrial wastewater treatment plant (IWWTP) that is to treat excess process water and surface runoff. The EIS provides limited information about this system, its design basis, the Project-specific testing conducted, or how the predicted effluent quality provided in Table 2.2-1 of the EIS was developed. Section 2.2.3.8 states, "a metallurgical test program was completed at SRC to help define the IWWTP design and performance criteria." However, no reference is provided to this program, nor have its results or conclusions have been discussed in the Application. This is a key part of the mine design and it is important, for review, that the EIS provide the information needed to understand and evaluate the efficacy of the proposed mitigation measures. Question/Recommendation: Table 2.2-1 in Section 2.2.3.9 outlines the upper bound effluent quality proposed for the Project and states, "the effluent quality was determined to be achievable through laboratory test results conducted by Denison at SRC." However, this section does not provide a comparison of the concentrations achieved at the bench scale with the upper bound limits. Also noted in Appendix B, Comment #17 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
132	ERFN (February 22, 2023)	Section 2.2.3.9 Treated Effluent Monitoring and Release Ponds	Comment #ERFN-029: The IWWTP process appears to use processes similar to those of other waste water treatment sites in the Canadian uranium mining sector. It would be useful if the EIS discussed the IWWTP relative to analogue sites in terms of the treatment technologies used and the quality of effluent achieved at other sites. Question/Recommendation: How does the predicted effluent quality shown inspection 2.2.3.9 compare to effluent from analogue sites in the Canadian uranium sector, for example water treatment systems at Cameco and Orano's projects in the region? Also noted in Appendix B, Comment #18 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
133	ERFN (February 22, 2023)	Section 2.2.3.9 Treated Effluent Monitoring and Release Ponds	Comment #ERFN-030: Table 2.2-1 of the EIS shows predicted effluent quality for the IWWTP. This table includes a prediction that the total dissolved solids in effluent is predicted to be 6,420 mg/L, with 600 mg/L chloride and 3,915 mg/L sulphate. The table also includes predicted effluent for copper of 0.042 mg/L. These levels approach the British Columbia's water quality guidelines associated with acute toxicity and so may be acutely toxic at the end-of-pipe (i.e. prior to discharge via diffuser in Whitefish Lake and subsequent dilution). Section 36.3 of the Fisheries Act specifies that, no person shall deposit or permit the deposit of a deleterious substance of any type in water frequented by fish."[1] The Canadian Metal and Diamond Mining Effluent Regulations (MDMER) includes a definition of deleterious substance as effluent that is	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement. As a result of the continued technical review until October 2024, Denison updated Table 2.2-1 to be reflective of the Federal Environmental Quality Guidelines for Copper.

			acutely lethal to several commonly tested species of fish and aquatic life. Question/Recommendation: Guidelines are not prescriptive and so the predicted effluent may or may not be acutely toxic, but since the levels of contaminants in predicted effluent are relatively high, it is recommended that the risk of acutely toxic effluent at end-of-pipe be assessed to support the EIS. Specifically, it is recommended that acute toxicity tests as described by MDMER be conducted on water quality matching the predicted effluent presented in the EIS. [1] https://laws-lois.justice.gc.ca/eng/acts/F-14/page-5.html#docCont Also noted in Appendix B, Comment #19 (Source Environmental Associates).	
134	ERFN (February 22, 2023)	Section 2.2.3.8 and 2.2.3.9	Comment #ERFN-031: (i) Sections 2.2.3.8 and 2.2.3.9 of the EIS describe the IWWTP and note that the design of the system is being informed by an ongoing Best Available Technology (BAT) study. The EIS is not clear if the system as described in the EIS is a reflection of application of BAT or if this is an interim design pending completion of the BAT study. (ii) Similarly, the EIS notes the use of zero valent iron (ZVI) as a treatment reagent but it is not apparent how this is to be used in the process. ZVI can be a very effective method for removing metals and metalloids from mine water, particularly for relatively small treatment systems (iii) Finally, the impact of different treatment technologies on TDS of effluent should be considered given the previous comment about potential for acute toxicity with the predicted effluent quality. Salt removal systems should be evaluated Question/Recommendation: (i) Given the predicted effluent quality in 2.2.3.9 and the relatively high predicted levels of copper, it is recommended that this BAT study include assessment of use of organosulphide reagents (i.e. trimercapto-triazine). This type of chemical is a common and inexpensive method of removing heavy metals such as copper and cadmium from water. Use of organosulphide is commonly incorporated into mine water treatment systems and is generally recognized as part of BAT treatment of mine water [1]. Copper levels in the range of single digit parts per billion (ppb) are achievable, below the 22 ppb predicted effluent quality. (ii) ERFN support the inclusion of this reagent in the process but requests additional information on how it is to be used. The predicted level of selenium in effluent (42 ppb) can likely be improved on through better application of ZVI (iii) Overall, ERFN support the use of a BAT study to inform design of the IWWTP and recommend that further bench testing be conducted in the future following the BAT study to improve on the predicted effluent quality presented in the EIS [1] https://mend-nedem.org/wp-content/uploads/MEND3.50.1BATEAAppAD.pdf Also noted in Appendix B, Comment #20 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
135	ERFN (February 22, 2023)	Section 2.2.3.8 Industrial Wastewater Treatment Plant	Comment #ERFN-032: According to the IWWTP flowsheet shown in section 2.2.3.8 of the EIS, treated effluent will be recycled Question/Recommendation: Considering that the leach is acidic and the IWWTP involves acid neutralization, it is recommended that drawing water for recycle from earlier in the treatment process be considered. This would reduce reagent demands from unnecessary acidification/neutralization as well as the amount of radionuclide and metals-laden treatment by-products that will have to be used and managed. Also noted in Appendix B, Comment #21 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
136	ERFN (February 22, 2023)	Section 2.2.3.9 Treated Effluent Monitoring and Release Ponds	Comment #ERFN-033: Section 2.2.3.9 of the EIS states, “the effluent quality was determined to be achievable through laboratory test results conducted by Denison at SRC.” However, Section 6.2 of Appendix 10- A (Sensitivity Analysis) states, “If treated effluent is released at the maximum upper bound discharge rate, cadmium concentration in Whitefish Middle/South and McGowan Lake (LA-1) would exceed its surface water quality guideline of 0.00004 mg/L, and chromium concentration in Whitefish Middle/South would exceed its surface water quality guideline of 0.001 mg/L. The modelled concentrations of other COPCs are expected to be below their corresponding surface water quality guidelines.” Question/Recommendation: Methods of preventing these exceedances should be explored and incorporated into the project. For example, alternative treatment technology may reduce metal loading with treated effluent, and greater water recycle would reduce the volume of treated water discharged, reducing the load of metal introduced to Whitefish Lake via treated effluent.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			More generally, these exceedances caused by a higher rate of discharge is an example of how the assumption to exclude water recycling from water balance predictions is not entirely conservative. Also noted in Appendix B, Comment #22 (Source Environmental Associates).	
137	ERFN (February 22, 2023)	Section 7.0 Geology and Groundwater	Comment #ERFN-034: The Application lacks a clear discussion of the various source terms that were considered for water quality modelling. Most reagents utilized for the ISR process include highly soluble contents and must be considered for modelling purposes. The Application is lacking a clear discussion of the various source terms and information geochemical stability of various sources that were considered for water quality modelling. Question/Recommendation: Please clearly describe the sources of various contaminants in process water and how they inform water management/water treatment design. Distinguish between contaminants found in natural groundwater, contaminants released through leaching, and contaminants introduced as mill reagents (i.e. sulphate, TDS). Also noted in Appendix B, Comment #23 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
138	ERFN (February 22, 2023)	Section 2.2.1.4.3 Permeability Enhancement	Comment #ERFN-035: Section 2.2.1.4.3 lists options considered for enhancing leach solution permeability in the leaching zone and includes potential for use of propellant permeability enhancement. Question/Recommendation: (i) How does this material compare to common blasting explosives (i.e. ANFO) in terms of potential for water soluble explosive residue to be left behind after use? (ii) ANFO is commonly an environmentally relevant source of ammonia, nitrite, and nitrate at mine sites. (iii) Please discuss the potential impact of propellant permeability enhancement products as a source of contaminants. Also noted in Appendix B, Comment #24 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
139	ERFN (February 22, 2023)	Section 2.2.2 Processing Plant Components	Comment #ERFN-036: Section 2.2.2 states “Denison’s processing plans are based on numerous metallurgical tests completed as part of engineering activities. A detailed metallurgical testing program was developed and implemented in collaboration with the Saskatchewan Research Council (SRC) under the supervision of several third- party consultants and Denison. Around 1,000 L of UBS was produced by leaching over 64 kg of core samples recovered from the Phoenix deposit and the UBS produced was tested using variations of several parameters to define the processing plant design and its components.” This work is critical for informing levels of contaminants expected to be leached in the in-situ process which in turn require treatment and management. This work is not discussed substantially in the EIS. Question/Recommendation: The EIS should discuss how this work was carried out, a summary of key conclusions including estimates of freshwater and recycled water use, recoveries expected, reagents consumed, waste produced and steady-state contaminant concentrations. Also noted in Appendix B, Comment #25 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
140	ERFN (February 22, 2023)	Section 2.2.4.8 Clean Waste Rock and Clean Waste Rock Pad	Comment #ERFN-037: Section 2.2.4.8 states that approximately 7,800 m3 of clean waste rock will be generated because of mining activities, and Section 2.2.3.6 states that “a pond may be constructed beside the clean waste rock pad (Section 2.2.4.8) to collect runoff if required. The pond would be a single geomembrane-lined pond (Figure 2.2-26). Water collected in the clean waste rock pond would be routed to the process water pond.” Question/Recommendation: The Application however does not provide information on the geochemical stability of the waste rock and how waste rock is expected to impact water quality of runoff/pond inflow. Also noted in Appendix B, Comment #26 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

141	ERFN (February 22, 2023)	Section 2.2.3.8 Industrial Wastewater Treatment Plant	Comment #ERFN-038: Section 2.2.3.8 states that "the majority of the IWWTP precipitates formed during the second stage of treatment are gypsum and these precipitates are not expected to be radioactive." Question/Recommendation: (i) How much radioactivity is expected in these solids? (ii) Did the metallurgical test program include testing these solids for radioactivity and, if available, have these results been considered in the long-term management strategy for these solids? Also noted in Appendix B, Comment #27 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement. As a result of the continued technical review until October 2024, the additional specific commitment has been made: Denison has committed to pre-construction and pre-clearing surveys for multiple species. Surveys will be completed by a qualified professional biologist that will refer to available guidance and protocols.
142	ERFN (February 22, 2023)	Section 2.2.3 Water Management	Comment #ERFN-039: Figures 2.2-15 and 2.2-16 show that water from the IWWTP process precipitate pond will be recycled to the process pond at a rate of 5.35 m3/h that then primarily reports back to the IWWTP for treatment with some used for drilling. The water from the IWWTP precipitate pond forms ~65% and 41% of the flow rate reporting to the IWWTP for treatment during the operations and Decommissioning phases, respectively, so this is a significant source of feed water to the IWWTP. Question/Recommendation: The geochemical stability of the precipitates in the two ponds should be evaluated and incorporated as source terms in water quality modeling. This should be discussed in the EIS. Also noted in Appendix B, Comment #28 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
143	ERFN (February 22, 2023)	Section 7.0 Geology and Groundwater	Comment #ERFN-040: The EIS does not provide information on the mine's plans for events of care and maintenance (C&M) or temporary closure. C&M is an important potential phase of mine life that warrant assessment of potential impacts. During C&M, changes to the site- wide water balance would be expected, potentially requiring modifications to the water management strategies at the site. In particular, it is important that a conceptual plan for how solution would be recovered/injected/managed on surface during a period of care and maintenance. Question/Recommendation: The EIS should include a conceptual description of how each major piece of mine infrastructure would be operated during C&M maintenance and how risk of environmental impact would be mitigated under these conditions. The following topics are recommended for discussion in C&M planning at the EIS level: (i) Any significant changes to the water management strategies at the site, including whether the Industrial Wastewater Treatment Plant would be expected to continue operating during C&M. (ii) Any significant changes in how the freeze wall would be operated. (iii) Discussion of how leachate and process solution would be managed, i.e. would injection/recovery continue or cease, would any recovered solution be subjected to uranium recovery, how solution would be managed on surface if re-injection ceased. (iv) If monitoring activities would change during care and maintenance. (v) If any new mitigation measures are required to address C&M specific risks. The development of the Care and Maintenance Plan must include input from ERFN. Also noted in Appendix B, Comment #29 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
144	ERFN (February 22, 2023)	Section 2.9.1 Environmental Management System Framework	Comment #ERFN-041: Section 2.9.1 includes discussion of several environmental management plans. Question/Recommendation: As a general comment, ERFN recommend that requirements for any project plan include the following, at a minimum, in addition to plan- specific topics: (i) Purpose and objectives of the plan; (ii) Roles and responsibilities of staff including identification of Qualified Professionals(s); (iii) Schedule for implementing the plan through relevant project phases; (iv) Means by which the effectiveness of the mitigation measures will be evaluated including the schedule for evaluating effectiveness; (v) Schedules and methods for the submission of reporting to specific regulatory agencies, ERFN, and the public and the required form and content of those reports; (vi) Process and timing for updating and revising the plan including consultation with regulatory agencies and ERFN that would occur in connection with such updates and revisions. Further, following the development of a plan, the plan should be provided to regulatory agencies and ERFN for review and consultation. Consultation should include invitation for agencies and	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			ERFN to provide their views on the content of the plan in a reasonable timeframe. Subsequently, Denison should provide a written explanation to each party that provided comments describing how the views and information provided by the party has been considered in the revised plan or why such views and information were not addressed in a revised plan Also noted in Appendix B, Comment #30 (Source Environmental Associates).	
145	ERFN (February 22, 2023)	Section 2.9.1 Environmental Management System Framework	Comment #ERFN-042: Section 2.9.1 of the EIS discusses environmental management activities including emergency response. As written, this section of the EIS focuses on the roles and responsibilities of Project staff. Communication to ERFN in the event of a mine emergency is critical for ERFN to evaluate potential impacts to rights and interests. Some mines in Canada overlook the importance of this communication and erode important partnerships with their Indigenous hosts by communicating information late or without transparency. Question/Recommendation: Recommendations for inclusion in the Plan include a communication protocol based on emergency risk ratings and communications with Nation representatives for high consequence near-miss incidents (i.e. near-miss incidents that could have resulted in major environmental impacts or medical emergencies), as these can be valuable opportunities to improve training and operating practices. It is recommended that management plans and emergency response planning include communication protocols with ERFN so that ERFN is alerted to any incident in a timely fashion. Collaboration with ERFN in plan development, communication protocol, involvement of ERFN members in monitoring/response planning is recommended. Also noted in Appendix B, Comment #31 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
146	ERFN (February 22, 2023)	Section 2.2.4.5 Process Precipitate Pond	Comment #ERFN-043: Section 2.2.4.5 states “the precipitates generated in the processing plant will be transferred to the process precipitate pond….this pond design will allow the precipitate totes to be stacked below ground level…….any runoff collected in the pond will be directed to the process water pond and recycled through the plant.” The Application also states that the waste stored in this pond contains 2-3% uranium rendering it potentially economic for resale and recovery. Question/Recommendation: A plan for managing this material should reprocessing not be economically viable should be prepared and discussed in the EIS. Also noted in Appendix B, Comment #32 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
147	ERFN (February 22, 2023)	Section 2.2.4.3.2 Industrial Landfill	Comment #ERFN-044: Section 2.2.4.3.2 discusses the industrial landfill that accepts industrial waste including radiologically contaminated waste. Leachate from this landfill will be collected and sent to the leachate collection pond immediately north of the landfill and eventually to the process water pond. Although the Application states that “upon closure of the site, the industrial landfill will be covered with an engineered impermeable liner system to minimize infiltration of precipitation into the containment system,” the leachate is not expected to stop. The Application however does not provide information on the management of the leachate from the industrial landfill post- closure. Question/Recommendation: Considering the limited life of the double liner system used for the landfill area, management of radiologically contaminated waste and its impact on the receiving environment for all phases of the project must be discussed in the EIS. Also noted in Appendix B, Comment #33 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
148	ERFN (February 22, 2023)	Section 2.2.2.2.1 Radon Purge Tank	Comment #ERFN-045: Section 2.2.2.2.1 states “the radon purge tank will contain a mechanical ventilation system to facilitate the aeration of the solution and the removal of radon gas from the UBS to the air outside of the plant.” Question/Recommendation: (i) Is radon stripping on the exhaust proposed or is it to be directed into the atmosphere? (ii) Has exposure outside the building been evaluated? Also noted in Appendix B, Comment #34 (Source Environmental Associates).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

149	ERFN (February 22, 2023)	Section 8.1.3 Existing Environment	Comment #ERFN-046: Detailed baseline hydrology collected in 2011-2014, prior to the operation of Cameco Cigar Lake. Very little data have been collected since (~1 measurement per year 2016-2019) Question/Recommendation: Update continuous flow data to include more recent years, with emphasis on low-flow period and winter flows.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
150	ERFN (February 22, 2023)	Section 8 General (Aquatic Environment)	Comment #ERFN-047: Surface water withdrawal Question/Recommendation: Please provide description(of waterbody characteristics as well as the precise latitude and longitude proposed) of all water withdrawal points to be used at any point during this project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
151	ERFN (February 22, 2023)	Section 8 General (Aquatic Environment)	Comment #ERFN-048: Recycling of process water. Question/Recommendation: Please provide examples from existing ISR projects that support the efficacy of process water treatment and re-use.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
152	ERFN (February 22, 2023)	Section 8.1 General (Aquatic Environment)	Comment #ERFN-049: Recycling of process water appears to not be meaningfully incorporated into water balance modelling. Question/Recommendation: Please clarify and justify how recycled process water was incorporated into surface water quantity / water balance modelling.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
153	ERFN (February 22, 2023)	Section 8.1.5 Mitigation Measures	Comment #ERFN-050: Denison makes “loose” promises with regard to maintenance and monitoring of water control structures, and avoiding sedimentation in local waterbodies/watercourses Question/Recommendation: Provide a water management plan (WMP) that addresses each phase of the project. Denison notes high confidence in assessments, implying few/no unknowns that would inhibit the creation of a sufficient WMP	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
154	ERFN (February 22, 2023)	Section 8.1.9 Surface Water Quality	Comment #ERFN-051: Notable lack of winter data for stream and lake sites. Question/Recommendation: Conduct at least 1 winter field visit to verify/refine field data. The focus should be on watercourses adjacent to and directly interacting with the project, and the proposed discharge zone in South Whitefish Lake.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

155	ERFN (February 22, 2023)	Section 8.2.3.3; Tables 8.2-2 to 8.2-4 Existing Surface Water Quality	Comment #ERFN-052: Note these tables use different benchmark/guideline compared to the Water Quality baseline study for Molybdenum and Zinc. Question/Recommendation: Proponent to provide justification for use of different Water Quality guidelines, or else adjust tables to reflect guidelines used in baseline study.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
156	ERFN (February 22, 2023)	Table 8.2-5 Existing Surface Water Quality	Comment #ERFN-053: Potential project interactions during construction. Question/Recommendation: (i) What about the potential for a grout/cement spill to the environment? (ii) Proponent should include recognition of potential deleterious interaction of construction materials(notably grout/cement) with the aquatic environment, and appropriate mitigation.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
157	ERFN (February 22, 2023)	Section 8.2.4.1.1 Site Water Management	Comment #ERFN-054: It is noted that the treated effluent holding ponds are designed to hold water for 72 hr. prior to discharge. Question/Recommendation: What laboratory will be used to test treated effluent samples to provide results within 72 hr? What if the water is deemed unfit to discharge? Please provide a surface water quality monitoring plan that includes clear information regarding sampling and analysis timelines to ensure discharge water is sufficiently tested prior to release. "Emergency release" due to pond capacity overage is unacceptable.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
158	ERFN (February 22, 2023)	Section 8.2.4.1.1 Site Water Management	Comment #ERFN-055: "Loose" commitment to Water Quality monitoring –"Treated water…will be monitored prior to release." Question/Recommendation: At what locations? How often? Which parameters? Recommendthecreationofa draft surface water monitoring plan to ensure appropriate actions are in place.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
159	ERFN (February 22, 2023)	Section 8.2.4.1.1 Site Water Management	Comment #ERFN-056: "Prior to release to a surface waterbody or injected into groundwater via deep well injection." Treated water discharge to South Whitefish Lake, where sufficient dilution of effluent would be anticipated, was the prior commitment. This is the first instance mentioned of deep well injection of effluent. No other aspect of this EIS discusses deep well injection of effluent. Question/Recommendation: Clarify the proposed effluent discharge method, and if Denison intends to use deep well injection, then the EIS should be updated to reflect the potential interactions associated with this method.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
160	ERFN (February 22, 2023)	Section 8.2.4.2 Potential Project-related Effects	(applies elsewhere as well) Comment #ERFN-057: Section notes that "Whitefish Lake" will receive discharge during operation and decommissioning, however, EIS separates into North and South Whitefish Lake. Question/Recommendation: Clarify throughout which Whitefish Lake (north or south) will be the receiving environment for effluent discharge.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

161	ERFN (February 22, 2023)	Section 8.2.4.2.1 Mobilization of Suspended Materials	Comment #ERFN-058: "acceptable levels" of TSS is noted as the deciding factor for safe discharge of treated water. Question/Recommendation: (i) What about other chemical constituents? All COPCs in the effluent are predicted to exceed long-term Water Quality Guidelines(CCME). (ii) What about MDMER requirements for the effluent to pass toxicity testing at end- of- pipe? (iii) Clarify whether Denison intends TSS to be the only factor contributing to the safety of effluent for discharge, and how the MDMER requirements for toxicity testing will be met.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
162	ERFN (February 22, 2023)	Section 8.2.4.2.1 Mobilization of Suspended Materials	Comment #ERFN-059: Salinity does not appear to be included as a factor for considering effluent safe for discharge. Question/Recommendation: Predicted salinity of effluent is sufficiently high as to possibly result in failure of the acute toxicity testing required under MDMER. (i) Please justify the exclusion of salinity as a factor for considering effluent safe for discharge. (ii) Please ensure the potential impacts of salinity on aquatic VCs are recognized and discussed.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
163	ERFN (February 22, 2023)	Table 8.2-10	Comment #ERFN-060: Sulphate is given 2 different values in the table in the LA-5 well-mixed column (633 and 63.83), but not in other columns. Question/Recommendation: (i) Clarify whether this is a typo, or whether these rows are referring to different constituents. (ii) Clarify why predicted sulphate is anticipated to be lower for the lower screening concentration.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
164	ERFN (February 22, 2023)	Section 8.2.4.2.3; Table 8.2-11 Near-Field Water Quality Model	Comment #ERFN-061: Mixing zone modelling. Question/Recommendation: (i) Why is plume formation in South Whitefish Lake modelled based on mixing zones in rivers? (ii) Justify the use of a lentic mixing model to represent effluent plume formation in a lotic environment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
165	ERFN (February 22, 2023)	Section 8.2.4.2.3 Near- Field Water Quality Model	Comment #ERFN-062: Mixing zone modelling in winter; there are very minimal data for the receiving waterbody in the winter, other than 1 shallow sampling event in April. Assumption is under-ice temperatures at the diffuser will be 3-4oC, with effluent emerging at 5oC. April sampling event suggests that under- ice temperatures may be closer to 0.5°C. Question/Recommendation: (i) How much effect will temperature differences between effluent and surrounding water have on mixing? (ii) Please clarify how mixing changes if input current from Icelander R. drops to near zero. (iii) Please clarify the effect of effluent salinity on mixing during winter.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
166	ERFN (February 22, 2023)	Table 8.2-11	Comment #ERFN-063: Average current velocity predicted in South Whitefish Lake at the discharge location is 0.23 m/s. However, in S. 4.3 of the Ecometrix aquatic baseline, average current velocity at S-6 (the channel feeding South Whitefish Lake) is 0.2 m/s. Question/Recommendation: (i) Why are the current velocities used to model the discharge mixing greater than the measured inflow velocities? (ii) Justify the disconnect between the current velocities measured upstream of the discharge location, and the velocities used to model the mixing zone.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

167	ERFN (February 22, 2023)	Section 8.2.7 Cumulative Effects	Comment #ERFN-064: Meeting Water Quality benchmarks Question/Recommendation: ERFN recognizes and appreciates Denison's commitment to meeting Water Quality benchmarks within and down stream of South Whitefish Lake. How will "appropriate benchmarks" be determined?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
168	ERFN (February 22, 2023)	Section 8.2.8 Monitoring and Follow-up	Comment #ERFN-065: Monitoring program expectations, guidance, and commitment. Question/Recommendation: The proposed monitoring seems, on its surface, reasonable. However, as noted above it is important to see a water quality monitoring plan integrated with a water management plan grounded in guidance and regulatory requirements (e.g., MDMER) that includes appropriate triggers, actions, and safeguards.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
169	ERFN (February 22, 2023)	Section 8.2.9 Surface Water Quality Summary	Comment #ERFN-066: Site-specific effluent treatment: the EIS overall is vague about the treatment planned for effluent prior to discharge. Question/Recommendation: Please provide examples of successful existing effluent treatment, preferably from ISR projects, which will form the basis for the site- specific treatment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
170	ERFN (February 22, 2023)	Section 8.3.1.1 Valued Component Selection	Comment #ERFN-067: MDMER requirements and deleterious substances. Question/Recommendation: Per MDMER guidance, please include a recognition that testing for Ammonia (un- ionized) is required under MDMER, and the requirement that effluent (at end-of-pipe, prior to dilution) must pass lethality testing.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
171	ERFN (February 22, 2023)	Section 8.3.3.1 Fish Habitat	Comment #ERFN-068: Fish habitat characterization. Question/Recommendation: (i) What fish habitat characterization standards were used during field surveys? (ii) Were members of the field teams environmental professionals experienced in the assessment of fish habitat?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
172	ERFN (February 22, 2023)	Table 8.3-5	Comment #ERFN-069: Burbot spawning habitat Question/Recommendation: What criteria were used to identify Burbot spawning habitat? Based on Burbot habitat preferences, SA-6 (at minimum) should be suitable for spawning.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

173	ERFN (February 22, 2023)	Table 8.3-5	Comment #ERFN-070: Fish species distribution and spawning habitat. Table 8.3-4 suggests the presence of Lake Whitefish in South Whitefish Lake(LA-5). Question/Recommendation: - Clarify fish presence in South Whitefish Lake, specifically Lake Whitefish and Lake Trout. ERFN would like to emphasize the importance of Northern Pike, Lake Whitefish, Lake Trout, Walleye, and White/Longnose Sucker to community members.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
174	ERFN (February 22, 2023)	Figure 8.3-8	Comment #ERFN-071: The proposed effluent discharge point appears to be extremely close to Northern Pike spawning habitat at the north/upstream end of South Whitefish Lake. Question/Recommendation: Please clarify the measures proposed to ensure effluent discharge does not affect Northern Pike spawning habitat, recognizing that Northern Pike spawning occurs shortly after ice-off, before high water.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
175	ERFN (February 22, 2023)	Section 8.3.4.2.1 Construction	Comment #ERFN-072: First mention of potentially “necessary” releases to the environment during the construction phase. Question/Recommendation: (i) What defines a situation where the release of collected/stored water is “necessary” during construction? (ii) Are there any other parameters other than TSS that will be measured to determine that water collected during construction is “safe”? (iii) Where will the collected water be discharged in the event of a “necessary” release during construction? ERFN would like to emphasize that a water management plan would address many of these questions.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
176	ERFN (February 22, 2023)	Section 8.3.4.2.1 (and elsewhere) Mobilization of Suspended Materials	Comment #ERFN-073: TSS as the parameter measured to determine the “safety” of effluent prior to discharge. Note that MDMER also requires that effluent at end-of-pipe must pass lethality testing. Question/Recommendation: (i) Please provide justification for only considering TSS with respect to the safety of effluent for discharge. (ii) If multiple parameters will be considered, please update the text to reflect this; at minimum, “e.g.,” should be used rather than “i.e.,”.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
177	ERFN (February 22, 2023)	Section 8.3.4.2 Potential Project-related Effects	Comment #ERFN-074: Consideration of overprinting as the only potential effect to fish habitat. Defining harm to fish habitat based solely on area Question/Recommendation: Effects to the quality/usability of fish habitat should be considered as part of the EIS, rather than simply the surface area covered by project structures.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
178	ERFN (February 22, 2023)	Section 8.3.4.2.3 Controlled Discharge to Receiving Environments	Comment #ERFN-075: “Discharge to the environment is not expected during construction.” This directly contradicts the statements in other sections regarding the potential for necessary water releases during construction. Question/Recommendation: Provide clarification regarding potentially necessary releases during construction.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

179	ERFN (February 22, 2023)	Section 8.3.4.2.3 (and elsewhere) Controlled Discharge to Receiving Environments	Comment #ERFN-076: "Effluent rates during Decommissioning are expected to be less than during Operation." Denison commonly uses "expected" but does not provide elaboration. Question/Recommendation: Please provide clarity and justification (e.g., examples) for expectations regarding effluent rates.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
180	ERFN (February 22, 2023)	Section 8.3.5 Mitigation Measures	Comment #ERFN-077: Adherence to DFO Interim Code of Practice for Temporary Stream Crossings. The proposed crossings are clear span bridges, which do not classify as temporary crossings. Question/Recommendation: Based on DFO code of practice guidance, the proposed crossings do not meet the requirements for being "temporary." Please update this section to include adherence to: Code of Practice for Clear Span Bridges and Code of Practice for Culvert Maintenance.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
181	ERFN (February 22, 2023)	Section 8.3.5 Mitigation Measures	Comment #ERFN-078: Monitoring and management of effluent. Question/Recommendation: Given that discharge is anticipated to trigger MDMER, adherence to the requirements for effluent quality within MDMER should be explicitly recognized as part of mitigation measures.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
182	ERFN (February 22, 2023)	Section 8.3.5 Mitigation Measures	Comment #ERFN-079: Preparation of an environmental code of practice. Question/Recommendation: (i) Please provide clarification regarding a timeline for the preparation of an environmental code of practice. It is ERFN's preference that this document be in place prior to construction. (ii) Will the environmental code of practice include consideration and planning in the event of malfunctions, as required under S19 of CEAA 2012? (iii) Will the environmental code of practice include and adaptive management plan for effluent discharge and treatment?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
183	ERFN (February 22, 2023)	Section 8.3.6.1 Construction	Comment #ERFN-080: Determination of effluent safety for release to environment. Question/Recommendation: Note again that earlier sections had asserted that contact water during construction would not be released to environment. Please revise the final sentence of paragraph 2 to be relevant to the fish & fish habitat section, as it currently refers to sediment chemistry and benthic invertebrate communities.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
184	ERFN (February 22, 2023)	Section 8.3.6.1 Construction	Comment #ERFN-081: Upgrading two stream crossings to clear-span bridges. Question/Recommendation: ERFN would like to re-emphasize the above comment [reference to ERFN comment 77] related to adherence to DFO's Code of Practice for Clear Span Bridges. The proposed crossings are clear span bridges, which do not classify as temporary crossings.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

185	ERFN (February 22, 2023)	Section 8.3.6.1 Operation	Comment #ERFN-082: Continued reference to deep-well injection of effluent. Question/Recommendation: Provide clarity throughout document on whether effluent will be discharged to South Whitefish Lake, or, to ground via deep well injection. If deep well injection is proposed, please revise EIS to reflect the potential interactions of this method.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
186	ERFN (February 22, 2023)	Section 8.3.6.1 Operation (and elsewhere)	Comment #ERFN-083: The effluent discharge will be heated to avoid freezing during winter. Question/Recommendation: (i) What are the implications for mixing during winter, given effluent will likely be considerably warmer than the surrounding water? (ii) How has Denison accounted for the potential for the warmer effluent creating an attractant effect, a reduction in DO, or other interaction that increases the risk of impacts to aquatic biota? (iii) Has Denison collected under-ice thermocline/isocline and in-situ WQ data during winter to support any assertions?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
187	ERFN (February 22, 2023)	Section 8.3.6.1 Operation (and elsewhere)	Comment #ERFN-084: Effluent discharge point. Question/Recommendation: Bottom-feeding fish such as White Sucker are in extended contact with and will often ingest sediments. Effects on White Sucker were modelled based on sufficient dilution of effluent. What protections will be built into the effluent discharge outlets to ensure bottom-feeding fish such as White Sucker are sufficiently excluded from the mixing zone?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
188	ERFN (February 22, 2023)	Table 8.3-9	Comment #ERFN-085: The magnitude of residual effect. ERFN disagrees that the parameters and decisions that form the basis for the mixing model and the IMPACT model are sufficient to reliably predict that constituents introduced by project activities will remain below applicable guidelines. Question/Recommendation: Mixing zone calculations should be revisited to account for actual hydrological conditions at the discharge point in South Whitefish Lake. IMPACT model calculations should be revisited to examine worst-case scenarios (e.g., maximum potential discharge of 81 m3/hr. during low-flow and winter) and use more accurate starting points for water quality (existing baseline conditions in South Whitefish Lake rather than a region-wide geometric mean).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
189	ERFN (February 22, 2023)	Table 8.3-9	Comment #ERFN-086: Reversibility. The assertion of fully reversible Water Quality effects relies on the assumption that all COPCs in the effluent are well-mixed and eventually exit South Whitefish Lake. Question/Recommendation: Please provide clarification and justification for the assumption that COPCs in effluent remains in solution and exit South Whitefish Lake, rather than concentrating over time and/or sequestering in sediments with the potential for future release.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
190	ERFN (February 22, 2023)	Table 8.3-10	Comment #ERFN-087: Magnitude. This row mentions changes to benthic invertebrate habitat. Question/Recommendation: This table is supposed to be discussing residual effects to fish habitat. Please ensure the residual effect tables include the correct information.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

191	ERFN (February 22, 2023)	Table 8.3-10	Comment #ERFN-088: Magnitude. The assertion of low magnitude relies on defining a change to fish habitat based solely on % of surface area affected. Question/Recommendation: Recommend revising this table and the associated written section to include discussion relating to potential changes to the quality of fish habitat in addition to the amount.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
192	ERFN (February 22, 2023)	Section 8.3.6.2 Significance and Confidence	Comment #ERFN-089: The judgement of not significant is reliant on successful mitigation measures, and that ecological integrity won't be altered beyond "an acceptable level." Question/Recommendation: (i) Recommend updating this section upon revision of the mitigation section, per above comments. (ii) What does "ecological integrity" mean? How is it measured? How will it be monitored? (iii) How will "an acceptable level" be determined? Acceptable to whom? ERFN requests that any determination of acceptability include consideration of the rights and values of Indigenous Peoples	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
193	ERFN (February 22, 2023)	Section 8.3.6.2 Significance and Confidence	Comment #ERFN-090: "The predicted confidence with respect to the Fish and Fish Habitat VC is high as the mobilization of suspended materials can be readily mitigated." Question/Recommendation: Please clarify the justification for not considering other Water Quality-related factors (e.g., chemistry) and focusing on TSS mitigation.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
194	ERFN (February 22, 2023)	Section 8.3.6.2 Significance and Confidence	Comment #ERFN-091: Conservative nature and accuracy of Water Quality modelling. Despite assumptions being conservative, the discharge model cannot produce conservative predictions if the inputs are inaccurate. Question/Recommendation: Please see ERFN comments 47-52, 55, 56, 58-64, 66-67, 73, 78, 80, 82-83, 85 and 86 for concerns regarding inaccurate model inputs.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
195	ERFN (February 22, 2023)	Section 8.3.6.2 (and elsewhere) Significance and Confidence	Comment #ERFN-092: Focus on suspended materials. Sulphate in the effluent is predicted to be exceptionally high (almost 4,000 mg/L), with baseline values in South Whitefish Lake <1 mg/L. Question/Recommendation: Why were potential cascading effects of Water Quality not considered in the residual effects assessment? Very high sulphate in effluent has the potential to instigate eutrophication and/or cyanobacterial blooms through sulphate reduction pathways.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
196	ERFN (February 22, 2023)	Section 8.3.6.2 Significance and Confidence	Comment #ERFN-093: Assertion of conservative assumptions for Water Quality modelling. Year-round discharge at the average rate (36.5 m3/hr.) is not conservative. Question/Recommendation: Please revisit the modelling with sufficiently conservative assumptions, such maximum potential discharge(81 m3/hr.) during low-flow and/or winter.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

197	ERFN (February 22, 2023)	Section 8.3.6.2 Significance and Confidence	Comment #ERFN-094: Use of conservative 95th percentile for baseline Water Quality. According to the model documentation provided in the EIS appendices, the geometric mean condition across all regional waterbodies was used to define baseline WQ. Question/Recommendation: Recommend revisiting the Water Quality modelling using the 95th percentile specifically for South Whitefish Lake(LA-5) as the baseline.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
198	ERFN (February 22, 2023)	Table 8.4-2	Comment #ERFN-095: Based on baseline data, 3 of 5 samples from LA-5 are >75% clay, and 2 of 5 are>70% sand. With only one year of data and without knowing where samples were collected in the lakes, it is unlikely that the classifications are truly representative of the average condition and variation of bottom sediments in study lakes. Question/Recommendation: (i) ERFN recommends Denison collect additional sediment samples to create a sufficient baseline (ii) ERFN recommends that Denison ensure future sediment sampling stations are located such that, at a minimum, sediments at the inlet, outlet, and potential discharge location of South Whitefish Lake are characterized.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
199	ERFN (February 22, 2023)	Table 8.4-3	Comment #ERFN-096: Sediment chemistry tables. Question/Recommendation: Why is there no standard deviation or standard error associated with the mean values in this table? Note that for LA-5, 3 of 5 samples have chemistry much more similar to the “maximum” values in Table 8.4-3 than the “mean” values.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
200	ERFN (February 22, 2023)	Table 8.4-4	Comment #ERFN-097: Benthic invertebrate endpoints. Note that diversity, evenness, and Bray-Curtis for the 2 of 5 sand- dominated samples from LA-5 are considerably higher than for the 3 of 5 clay-dominated samples. This seems to suggest that some areas in LA-5 are especially sensitive to stressors, as suggested in the above paragraph. Question/Recommendation: (i) Why is there no standard deviation or standard error associated with the mean values in this table? (ii) ERFN recommends Denison consider the potentially sensitive areas within the proposed receiving environment (LA-5) in addition to the average condition.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
201	ERFN (February 22, 2023)	Table 8.4-4	Comment #ERFN-098: Benthic invertebrate endpoints for LA-5 appear to be miscalculated. Based on raw benthos baseline data, total family richness at LA-5 across all reps is 22 (however, mean is 13). %Cladocera, the dominant taxon (water fleas) is 65% across all reps (58% avg). Question/Recommendation: (i) Please revisit and confirm the summary calculations for Table 8.4-4. (ii) Why were more typically pelagic taxa, such as Cladocera, not excluded from benthic invertebrate community characterizations as is often recommended in analytical guidance?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
202	ERFN (February 22, 2023)	Section 8.4.3.2.5 Benthic Invertebrate Chemistry	Comment #ERFN-099: Use of caddisfly larvae to characterize benthos tissue. Caddisflies are rare across the LSA, and extremely rare in South Whitefish Lake(LA-5) based on baseline data (only 4 individuals across all 5 replicates). Question/Recommendation: (i) Why were caddisfly larvae selected for benthic invertebrate tissue characterizations when they do not appear to be representative of the community? (ii) ERFN recommends Denison revisit the characterization of baseline benthic invertebrate tissue using taxa that are more relevant to the project or whole- community samples.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

203	ERFN (February 22, 2023)	Table 8.4-5	Comment #ERFN-100: Benthic invertebrate tissue chemistry summary. Question/Recommendation: Please include any available tissue chemistry guidelines in this table.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
204	ERFN (February 22, 2023)	Table 8.4-5	Comment #ERFN-101: Benthic invertebrate tissue chemistry summary. One sample per lake, representing only one year of baseline data, is insufficient to characterize baseline conditions. Question/Recommendation: ERFN recommends Denison conduct at least one additional year of baseline data collection, including the collection of multiple benthic invertebrate tissue samples from South WhitefishLake.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
205	ERFN (February 22, 2023)	Section 8.5.3 Existing Environment	Comment #ERFN-102 to 104: Fish tissue collection. Question/Recommendation: (i) Why were Lake Whitefish and Walleye not collected for tissue analyses? These species were also identified by ERFN citizens as important resources. (ii) Please provide additional justification for only using 5 fish in a single sample year for the characterization of baseline fish tissue chemistry. (iii) Why were organs, such as livers, discarded? Liver chemistry analyses are commonly recommended in fish tissue characterization guidance.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
206	ERFN (February 22, 2023)	Section 8.5.4.2.2 Construction	Comment #ERFN-105: “Discharge to the environment is not expected during Construction.” There appear to be contradictions across sections regarding whether discharge during construction will not occur, or whether it would occur “if necessary.” Any discharge, even emergency discharge, would have implications for the fish health VC and should be considered in this section. Question/Recommendation: Please provide clarity throughout the document with regards to the anticipated effects from discharge (including “if necessary” emergency discharge) during construction.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
207	ERFN (February 22, 2023)	Section 8.5.4.2.2 Operation and elsewhere Section 8.5.6.2 Significance and Confidence in the Assessment	Comment #ERFN-106 and ERFN-111: “The Project was assessed as having…a continuous effluent discharge rate of 81.0 m3/hr.” This statement appears to contradict earlier assertions (see comment # ERFN -093 regarding S 8.3.6.2, above) that the conservative WQ model was based on average discharge of 36.5 m3/hr. Question/Recommendation: Please provide clarification throughout document on whether the assessments were based on the greatest potential effects at a discharge rate of 81 m3/hr., or a reduced potential effect at a discharge rate of 36.5 m3/hr. If assessments were not conducted based on discharge at 81 m3/hr., please provide additional justification for using less- conservative estimates.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
208	ERFN (February 22, 2023)	Section 8.5.4.2.2 Operation	Comment #ERFN-107: “Sediment baseline concentrations were predicted from surface water concentrations.” Question/Recommendation: Why were sediment baseline concentrations not based on actual sediment baseline data?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

209	ERFN (February 22, 2023)	Section 8.5.4.2.2 Operation	Comment #ERFN-108: "The dw to ww ratio of 0.25 to 1 from CSA N288.1-20 was used." Note that the recommended ww criterion after conversion, if site- specific data were used, would be closer to 2.28 mg/kg (ww) and White Sucker tissue predictions would exceed this criterion. Question/Recommendation: Why were site-specific %moisture data not used for this conversion? It would likely be closer to 0.2 to 1 based on actual fish tissue baseline data.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
210	ERFN (February 22, 2023)	Figure 8.5-5	Comment #ERFN-109: Predicted tissue concentrations of selenium in Northern Pike and White Sucker. Based on the IMPACT model report, Northern Pike were exposed to COPCs through water only (despite being used to represent piscivorous predator), and White Sucker were exposed through water and sediments (as it is a bottom-feeder). Question/Recommendation: (i) Please justify the use of the IMPACT model data for Northern Pike tissue, given that it excludes any pathway related to piscivory. (ii) Please justify the use of the IMPACT model data for White Sucker tissue, given that is excludes any pathway related to the consumption of benthic invertebrates in addition to exposure to sediment. (iii) Note that studies on the toxicity of effluent to fish at the nearby Cameco Key Lake mine directly implicated dietary selenium.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
211	ERFN (February 22, 2023)	Section 8.5.5 Mitigation Measures	Comment #ERFN-110: "Implement Project-specific monitoring programs…that include…and applying adaptive management, if necessary." Question/Recommendation: Please remove the "if necessary" qualifier; ERFN considers the monitoring mentioned in 8.5.5 and the application of adaptive management to be necessary for the successful mitigation of residual effects.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
212	ERFN (February 22, 2023)	Section 8.5.6.2 Significance and Confidence in the Assessment	Comment #ERFN-112 "A high degree of confidence was assumed." Question/Recommendation: ERFN does not echo the high degree of confidence in this assessment, for multiple reasons including(but not limited to):apparent contradictions in the assessment methods and parameters, distinctly lacking baseline data, unsupported selection of modelling parameters, numerous assumptions without evidence for their validity, no references to contingency planning.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
213	ERFN (February 22, 2023)	Section 8.5.8 Monitoring and Follow-Up	Comment #ERFN-113: Regulatory criteria for monitoring data comparison. Question/Recommendation: ERFN requests including comparisons to any applicable human health guidelines and/or screening criteria in all monitoring programs	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
214	ERFN (February 22, 2023)	Section 8.5.8 Monitoring and Follow-Up	Comment #ERFN-114: Monitoring locations. Question/Recommendation: ERFN requests the addition of a monitoring site for (at minimum) aquatic sediments, located within the Northern Pike spawning habitat north of the proposed discharge location	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

215	ERFN (February 22, 2023)	Section 8.5.8 Monitoring and Follow-Up	Comment #ERFN-115: "It is recognized that additional collection of pre-mining fish tissue concentrations in Whitefish Lake and a reference area is needed." ERFN acknowledges and appreciates this recognition, but notes that the majority of baseline data for aquatic biota and sediments is extremely lacking. This also appears to be the only recognition of insufficient baseline data throughout the entire EIS. Question/Recommendation: Please update the other EIS sections to reflect the data gaps in the baseline sections, and an outline of the plan to address these gaps.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
216	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Table 1-2	Comment #ERFN-116: High-level sample locations are provided, but an appropriate evaluation and characterization of baseline conditions require targeted sampling in specific areas. Question/Recommendation: Please update Table 1-2 to include sampling site coordinates (and replicate coordinates, if they are different), or, please provide a separate list of precise sample coordinates.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
217	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Figure 1-7	Comment #ERFN-117: Based on this figure, neither bathymetry nor habitat surveys were completed on South Whitefish Lake (LA-5). Bathymetry and fish habitat are crucial to evaluating potential project impacts in the receiving environment. Question/Recommendation: (i) If these surveys have been completed, please update Figure1- 7 and provide the location of these data. (ii) If these surveys represent a data gap, ERFN recommends that Denison complete bathymetry and habitat surveys on South Whitefish Lake to sufficiently characterize the effluent discharge receiving environment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
218	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Figure 1-8	Comment #ERFN-118: Although benthic invertebrate sampling was completed in South Whitefish Lake, based on this figure, the potential inputs from upstream have not been characterized. Question/Recommendation: ERFN recommends collecting benthic invertebrate samples at SA-6 to characterize the potential upstream inputs to the benthic invertebrate community of the receiving environment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
219	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 2.0	Comment #ERFN-119: ERFN recognizes that Denison followed standardized or recommended field methodology during the collection of baseline information. Question/Recommendation: (i) What guidance did Denison follow to determine the frequency of baseline sampling? (ii) What guidance did Denison follow to determine the number of years that would provide sufficient characterization of the aquatic baseline? (iii) What guidance did Denison follow to determine the sampling locations and the number of samples?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
220	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 3.5.1	Comment #ERFN-120: The hydrological baseline data are now 8-10yearsold. These data are too old to sufficiently characterize the current baseline conditions, especially given that development has occurred in the Project area within that time. Question/Recommendation: Denison should collect updated hydrological baseline data for South Whitefish Lake, including (but not limited to) water level, ice thickness, and bathymetry.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

221	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 3.5.1.3	Comment #ERFN-121: The South Whitefish Lake bathymetric baseline data collected by Golder in 2012 suggests that the average depth was 1.1 m. This appears to contradict the depth used in the mixing model(~3 m). Question/Recommendation: Please clarify the data and decisions that contributed to the depth parameter used for the mixing model.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
222	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 3.5.4	Comment #ERFN-122: Section suggests a collection of habitat data in South Whitefish Lake was completed in 2012 by Golder, and observations were made during the 2016 field program. Question/Recommendation: (i) Where are these data? Does Denison have a detailed characterization of the aquatic habitat in South Whitefish Lake available? (ii) ERFN does not agree that high- level observations made during 2016 are sufficient to confirm that aquatic habitat has remained unchanged for the last 10 years.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
223	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 3.5.5	Comment #ERFN-123: As referenced in comment #ERFN-092, the baseline phytoplankton community for South Whitefish Lake is nearly 30% Cyanophyceae, the highest proportion of cyanobacteria in any Project waterbody except Russel Lake. This is likely to influence the risk of eutrophication in the receiving environment. Question/Recommendation: Please confirm whether the risk of eutrophication in South Whitefish Lake has been considered and justify its exclusion from the EIS.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
224	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 3.5.7	Comment #ERFN-124: Fish spawning habitat. Question/Recommendation: ERFN recognizes the inclusion of Indigenous Knowledge in confirming local fish spawning habitat.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
225	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Table 3-7C	Comment #ERFN-125: Caddisflies comprise <1% of the benthic invertebrate community in the receiving environment. Question/Recommendation: Please justify the specific selection of caddisflies for characterizing the baseline benthic invertebrate tissue chemistry.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
226	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Table 3-8	Comment #ERFN-126: No tissue chemistry guidelines are provided for benthic invertebrates. Question/Recommendation: ERFN recommends the inclusion of any available tissue chemistry guidelines for benthic invertebrates, including those from other Canadian jurisdictions, to provide sufficient context for evaluating the baseline data.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

227	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Table 3-10	Comment #ERFN-127: There appears to be a disagreement between the n's provided in this table, and the description of fish tissue collection methods in the baseline and EIS. The methods section implies that 5 total samples were collected per waterbody, with some samples representing more than 1 fish. Question/Recommendation: Please clarify the fish tissue collection and analysis methods. Were all fish analyzed separately? Were tissues for each "sample" aggregated if multiple fish were required?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
228	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Table 3-10	Comment #ERFN-128: The table presents the average concentration of parameters, but no indication of variation/accuracy. Question/Recommendation: Please provide standard deviation and/or standard error for fish tissue chemistry average values.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
229	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Figures 3-10 and 3-11	Comment #ERFN-129: The inclusion of bathymetric and habitat survey data for North Whitefish Lake (LA-6) from 2018 highlights the lack of similar surveys on South Whitefish Lake(LA-5), which is the actual receiving environment. Question/Recommendation: (i) Please justify the lack of current bathymetric and habitat survey data for South Whitefish Lake. (ii) Denison should conduct multibeam sonar surveys on South Whitefish Lake, the receiving environment, to sufficiently characterize bathymetry and aquatic habitat.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
230	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 4.6.1	Comment #ERFN-130: Paragraph two notes that stage- discharge curves were updated in 2019 to account for greater discharge measured during manual surveys in 2019. Question/Recommendation: (i) Were stage-discharge curves adjusted for flows measured in recent years, other than 2019? Were manual measurements collected in any other recent years? (ii) If not, please justify the adjustment of stage-discharge curves based on a single year that had a higher- than-average discharge. How does Denison know that flows in 2019 were not abnormally high?	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
231	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 4.6.1.2 and Table 4-1	Comment #ERFN-131: "In May-early June 2018, the flow at SA-6 was fluctuating around 0.7 m3/s until end of May before decreasing." This appears to imply that freshet flows in 2018 (assumedly high flows for that year) were near the minimum discharge measured from Sept 2016 to Aug 2019 (0.717 m3/s). Question/Recommendation: (i) Were stage-discharge curves updated to reflect the flows in 2018? (ii) Please clarify the decisions and data used for updating stage-discharge curves.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
232	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 4.6.3	Comment #ERFN-132: "Mean channel wetted width, water depth and water velocity were 14 m, 0.7 m and 0.2 m/s, respectively." Question/Recommendation: How does a wide, slow, low-gradient inflow translate to the current velocities used for mixing modelling? Please refer to the earlier comment and justify the assumptions made for the mixing model.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

233	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 4.6.3	Comment #ERFN-133: "Snails (Gastropoda), mayfly nymphs (Hexagenia sp.) and dragonfly nymphs were observed." Field observations do not substitute for sample collection and taxonomy. Question/Recommendation: As noted in an comment #ERFN-118, ERFN recommends benthic invertebrate sampling at SA-6 to sufficiently characterize the benthic invertebrate community upstream of South WhitefishLake.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
234	ERFN (February 22, 2023)	Appendix 8-D Baseline Aquatic Environment Study Section 4.6.4	Comment #ERFN-134: Burbot were recovered at SA-6 but were considered not present in South Whitefish Lake. Question/Recommendation: Please justify the assertion that burbot are not present in South Whitefish Lake, despite recovering them shortly upstream at SA-6.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
235	ERFN (February 22, 2023)	Appendix 10-A, Appendix A: Wheeler River Project IMPACT Model Figure 2-1	Comment #ERFN-135: This figure illustrates that absorption from surface water was only source of COPCs investigated for Northern Pike as part of the IMPACT model. Northern Pike was intended to represent piscivorous predators for the purpose of this modelling. Question/Recommendation: Please justify the results of the IMPACT model for Northern Pike despite not accounting for piscivory or any other feeding. Note that studies on the toxicity of effluent to fish at the nearby Cameco Key Lake mine directly implicated dietary selenium.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
236	ERFN (February 22, 2023)	EIS Appendix 10-A, Appendix A: Wheeler River Project IMPACT Model Table 3-4	Comment #ERFN-136: The "Water Baseline" used for the IMPACT model integrates surface water quality from multiple regional waterbodies. This results in baseline chemistry that is lower (sometimes 10x lower) than the chemistry of South Whitefish Lake, the receiving environment. Question/Recommendation: Please revisit the IMPACT model using surface water quality data accurate to the South Whitefish Lake receiving environment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
237	ERFN (February 22, 2023)	Section 9.2.1, 9.3.1, and 9.4.1: Influence of IK, LK and Engagement on VC selection.	Comment #ERFN-137: Concerns raised by the ERFN during August 2022 engagement sessions (e.g., for subsistence/harvestable foods, important vegetation communities, and wildlife habitat) do not appear to have been considered during VC selection. Question/Recommendation: Update Section 9 to incorporate concerns raised in the August 2022 submission and demonstrate how these comments have been addressed or considered in the assessment as VCs, or KIs for existing VCs (i.e., wetlands, woodland caribou).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
238	ERFN (February 22, 2023)	Section 9.2.1, 9.3.1, and 9.4.1: Influence of IK, LK and Engagement on MP considerations.	Comment #ERFN-138: Relevant criteria for VC selection according to the EIS includes: "'contributing roles to biodiversity, ecosystem function, and maintenance of wildlife habitat," and "contributions to environmental, socio-economic, and cultural values of Indigenous groups, the public and other Interested Parties" (EIS 9.2.1, 9.3.1, and 9.4.1), among others. Question/Recommendation: Overall changes in habitat for wildlife and plants of cultural importance within the Project area, LSA and RSA must be considered as a measurable parameter.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

239	ERFN (February 22, 2023)	Section 9: Influence of IK, LK and Engagement on Mitigation and Monitoring considerations.	Comment #ERFN-139: Wetlands were recognized in the EIS as important for multiple reasons and designated a VC. However, the potential impacts and their mitigation and monitoring were not adequately characterized or discussed. Question/Recommendation: (i) Changes in aerial extent of wetlands as the single MP for this VC is insufficient to monitor all changes in these habitats – they are key lifecycle habitat (breeding/foraging/cover) areas for species of management concern as they relate to both the EIS and ERFN (e.g., small furbearers such as beaver, mink; large ungulates such as moose; game birds/species at risk; supports growth of subsistence foods such as cranberries). (ii) Drawdown effects on wetlands were not identified as a potential effect, even though water withdrawal requirements exist for majority of Project timeline, and Project design incorporates an inward hydraulic gradient. (iii) Overall changes in habitat for wildlife and plants of cultural importance within the Project area, LSA and RSA must be considered as a measurable parameter.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
240	ERFN (February 22, 2023)	Section 9.1.4, (9.2.4, 9.3.4 and 9.4.4): Influence of IK, LK and Engagement on Mitigation and Monitoring considerations	Comment #ERFN-140: "Reclamation design planning is at a conceptual or pre-feasibility stage. Presently, most Project features are planned to be reclaimed by re- instating (to the extent practical) predominant topographical contours and drainage features, and preparing the site (e.g., via grading, and scarifying and/or other surface preparations) in a manner that promotes natural revegetation.... Certain Project features (e.g., the clean waste rock pile) may be integrated into the end-landscape... to create a safe, stable, and self- sustaining landscape." (pp. 9-28) Concerns were raised in engagement sessions about documenting caribou calving locations and participating in mitigating possible effects(SVS, 2022).The loss of wetland areas may reduce the amount of habitat available for moose and caribou calving, as well as other stages of the irrespective life histories. This interaction will directly impact the availability of this important resource. Question/Recommendation: Section 9 and Table 3.5-1 should be updated to reflect recommendations for reclamation priorities identified in the ERA and ERA-annex, in addition to federal recovery strategies (i.e., Woodland caribou, wolverine) mitigations and management recommendations for species at risk, and species-specific IK and LK. Denison must consider all pathways of effects, including those which are indirect, such as the loss or conversion of lands used as habitat by species of cultural importance	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
241	ERFN (February 22, 2023)	Section 9.1.3.3: Influence of IK, LK and Engagement on VC selection.	Comment #ERFN-141: Permafrost was investigated but not adequately characterized to support conclusions made in the EIS. Potential presence is established, and engagement concerns were raised "specifically referencing cumulative effects through mention of climate change and the vulnerability of northern environments," "potential effect of exploration on various characteristics of the biophysical environment" (pp. 4-25); and "possible changes to permafrost on the Wheeler River" (pp. 4-33). Question/Recommendation: Sections 6and9 should be updated to include verification of the presence/absence/extent of permafrost within the Project Area or permafrost interactions with the Project within the CEA.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
242	ERFN (February 22, 2023)	Section 9.1.4: Assessment of Project- related Effects.	Comment #ERFN-142: "Activities during Post- Decommissioning (comprising site inspections, monitoring and on-site engagement with interested parties) were deemed to have no interaction because they do not involve any land clearing, surface preparations or major earthworks" (EIS 9.1.4). Post-Decommissioning activities should incorporate changes issued by regulatory bodies, required mitigations or actions identified through the Denison Environmental Monitoring System/adaptive management process, and/or Indigenous/third party engagement recommendations. Question/Recommendation: Update Section 9 to include further detail regarding post-decommissioning activities resulting in earthworks for: changes issued by regulatory bodies, required mitigations or actions identified through the Denison Environmental Monitoring System/adaptive management process, and/or Indigenous/third party engagement recommendations.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

243	ERFN (February 22, 2023)	Section 9.1.1.1 VC Selection (Terrain, Soil, and Organic Matter/Peat) and 9.2.3.2 Listed Plant Species VC	Comment #ERFN-143: Baseline studies for the Terrestrial Environment component of the EIS were conducted from 2017-2019 and were refined in 2019 with a focus on the Phoenix development only. Soil and terrain baseline data was presented at broad scale and coarse resolution (1:20,000) in the original investigations (Appendix 9-B), and baseline vegetation data categorized disturbed forest stands as novel regenerating forest types. This was defined and corrected further by the literature review and mapping contained in Appendix 9-C. Vegetation/wildlife habitat characterization were completed over two surveys in July-Aug 2017 (Appendix 9-B; with no sampling completed for waterbodies/disturbed non-vegetated lands), before the project footprint was altered – in consultation with the SK MOE, the EIS can carry forward with existing information with the condition that additional rare plant pre-disturbance surveys would accompany project approval. Question/Recommendation: ERFN appreciate the recognition of a data deficiency and concur that additional rare vascular plant surveys are required in ecosites not sampled previously to fully investigate the terrestrial environment component of the project and related effects. As baseline survey efforts focused on mid- and late-season rare vascular species, and further information on wetlands in the RSA is proposed to better characterize wildlife habitat and availability of subsistence harvestable food/medicinal plant resources, early-season surveys that also target wetland habitats are recommended.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
244	ERFN (February 22, 2023)	Section 9.2.4.2.2 Change in the Concentrations of COPC in Vegetation	Comment #ERFN-144: Per the ERA, vegetation and soil collection and chemistry were completed at 10 permanent sample plots in August 2017 – terrestrial lichens, current year's growth of blueberry(leaf, stem, berries), and soil samples were collected. Radionuclide levels are relatively consistent(lichen, blueberry and soils); however, several metal/elemental parameters were elevated when compared to Rio Rinto's Roughrider Project. Question/Recommendation: The EIS identified Labrador tea and browse as also being estimated for metals/radionuclides COPCs in the ERA – this was not included in the ERA; however, red-backed voles were also tested during the small mammal baseline program (Appendix 9-B). Update section to reflect same.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
245	ERFN (February 22, 2023)	Section 9.3.1.1 VC Selection (Ungulates, Furbearers, and Woodland Caribou)	Comment #ERFN-145: This VC list omits several species which have been identified by ERFN as commercially important for trapping purposes, including Lynx, Muskrat, Fisher, Fox, Otter, and Mink. As noted in the ERFN Traditional Knowledge Study, concern was raised about the impacts of the mine and associated infrastructure on the ability to trap and trapping success. Presence of lynx, fisher, fox, otter, muskrat, beaver and mink were identified in the baseline winter tracking studies (Appendix 9- B). Question/Recommendation: Presence of all ERFN-identified traditionally important species were observed in the baseline winter tracking studies (Appendix 9- B). Overall changes in habitat for wildlife and plants of cultural importance within the Project area, LSA and RSA must be considered as a measurable parameter	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
246	ERFN (February 22, 2023)	Section 9.4.3 Existing Environment (Raptors, Migratory Breeding Birds, and Bird Species at Risk)	Comment #ERFN-146: Appendix 9-C identifies knowledge gaps for information to fully describe the wildlife assemblage in the RSA, including avian species of management concern. Species Detection Survey Protocols (SK MOE 2021) were not implemented for the baseline avian surveys. Recommendations for sensitive timing windows and setback distances from high disturbance activities should be considered for rusty blackbird, which may also use the RSA. The baseline survey did not account for early- season breeding species of management concern (i.e., owls, woodpeckers, game birds). Question/Recommendation: Additional surveys are recommended utilizing appropriate species detection survey protocols to account for VCs and additional species of management concern with the potential to occur in the project area.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

247	ERFN (February 22, 2023)	Section 9 (General) VC Selection	Comment #ERFN-147: Some small mammals were shown to observe elevated levels of select COPCs during baseline studies (Appendix 9-B) but were not discussed in the EIS. Bats and Amphibians were also not considered in the EIS as VC or KIs, even though both bat species and one amphibian species are listed under SARA. Traditional species of cultural importance for gathering and subsistence were also not included. Question/Recommendation: Provide a rationale why these components were not considered.	
248	ERFN (February 22, 2023)	Section 9 (General) VC Selection	Comment #ERFN-148: Several iterations in the EIS state baseline studies were not designed to establish relative abundance estimates for furbearer VCs, whereas certain baseline surveys (Appendix 9- B) were designed to provide quantitative data on the occurrence and relative abundance (i.e., semi- aquatic furbearer shoreline study, winter track count). Question/Recommendation: Provide rationale for not incorporating relative abundance.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
249	ERFN (February 22, 2023)	Section 9.3.3 Existing Environment; EIS Section 9.3.5 Mitigation Measures	Comment #ERFN-149: Appendix 9-C identifies knowledge gaps for information to fully describe the wildlife assemblage in the RSA, including ungulates (woodland caribou and moose), but there is no recognition of the implications of these gaps or suggestions to address them. Question/Recommendation: ERFN notes if recent aerial ungulate survey data are unavailable, the Proponent should consider management and development recommendations available for the region and management areas, in addition to the federal recovery strategy for caribou, as part of the EIS.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
250	ERFN (February 22, 2023)	Section 9.3.5 Mitigation Measures	Comment #ERFN-150: The mitigations for linear disturbances identify ongoing research into the effectiveness of disrupting predator- prey dynamics along linear disturbances. Appendix 9-B includes recommendations for reclamation of linear disturbances around the Project Area. Question/Recommendation: ERFN acknowledges the efforts by Denison and the recommendations provided in Appendix 9- B for the reclamation of linear disturbances, and requests the Proponent to consider prioritizing progressive reclamation in these areas as a commitment within the EIS, in addition to utilizing ongoing research data to adjust and inform reclamation planning and implementation.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
251	ERFN (February 22, 2023)	Section 9.1.5, 9.2.5, 9.3.5, 9.4.5 (General) Mitigation Measures	Comment #ERFN-151: Spill response plan. Question/Recommendation: It is recommended that monitoring during Project Activities occur to minimize discrete spills wherever possible, per the Spill Response Plan. Spill Response Plan should include reportable quantities, spills report line directly to proponent, and specific procedures for documenting and reporting spills to regulatory bodies.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
252	ERFN (February 22, 2023)	Section 9.2.5.2.4 Invasive Plant Management	Comment #ERFN-152: Additional mitigation measures include use of herbicides or other bio-controls to address invasive species establishment. Denison does not provide evidence discussing the potential impacts to the Terrestrial Environment VCs from the use of herbicides or other bio-controls. Question/Recommendation: Denison must provide information on how impacts will be mitigated if herbicides or other bio-controls are used.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

253	ERFN (February 22, 2023)	Section 9 (General) Wildlife mitigations	Comment #ERFN-153: Fencing for deterrence of entrapment in certain Project areas Question/Recommendation: Fencing should be buried deep enough to prevent potential interactions with burrowing animals, and high enough to prevent wildlife movement over the fence. Fencing should be monitored for entrapped wildlife at regular intervals identified within the EMS, and a plan should be in place for the non-lethal removal of trapped wildlife if required.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
254	ERFN (February 22, 2023)	Section 10.1.1.2 Key Indicators and Measurable Parameters	Comment #ERFN-154: Public Health is Identified as a Key Indicator and is informed by Measurable Parameters which include: "Evaluation of risk of exposure to COPCs through use of hazard quotient, incremental lifetime cancer risk, or radiation dose," is a very narrow view of human health as it is affected by this project. This ignores a wide range of physical and psychological factors which may influence the health and wellbeing of ERFN citizens. Question/Recommendation: Denison should provide additional analysis of the Public Health Key Indicator which includes Measurable Parameters to qualitatively or quantitatively assess mental health, psycho- social factors and wellness as it may be influenced by this project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
255	ERFN (February 22, 2023)	Section 10.1.1.3 Spatial and Temporal Boundaries	Comment #ERFN-155: The spatial boundaries for the assessment of Human Health are not appropriate as it ignores the many persons who use the area surrounding the project but do not reside within the LSA or RSA catchment area. Most ERFN land users live further south in Patuanak/ Wapachewunak Reserve but use the area around the project to harvest and exercise rights, therefore must be considered within the geographic scope of the assessment Question/Recommendation: Denison reassesses the Public Health key indicator to include Patuanak/Wapachewunak Reserve, as the closest population centre.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
256	ERFN (February 22, 2023)	Section 10.1.3.2 Traditional Foods Diet	Comment #ERFN-156: Denison note that Walleye and Lake Whitefish are the most commonly consumed fish within the study area to inform the HHRA. While these are important species, they may not be fully representative of the full risks posed by fish. For example, longer- living fish such as Lake Trout are consumed, and as top predators are at a greater risk for bioaccumulation Question/Recommendation: Denison should consider bioaccumulation risks associated with other country foods consumed. This includes considering and incorporating species which are both consumed in the greatest quantities, but also are representative of the greatest risk for use in the HHRA.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
257	ERFN (February 22, 2023)	Section 10.1.4.1 Potential Interactions Between the Project and Valued Component/Key Indicators	Comment #ERFN-157: Table 10.1-3 Outlines a list of project phases/activities and an indication of whether they are likely to interact with Public Health. This table, however, fails to provide information about the effects of pathways or how the proposed activities may result in impacts on public health. Question/Recommendation: ERFN request Denison provide a breakdown of the effects pathways and predicted or plausible impacts for each of the project activities which may influence public health.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
258	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning	Comment #ERFN-158: As outlined in Appendix 6A, elevated levels of NO2 and Radon are expected to be observed outside of the area established as the LSA and in some cases the RSA to assess human health. Therefore, the assessment of potential project-related effects associated with air emissions during construction, operation, and decommissioning should be considered in complete. Question/Recommendation: Denison provides a revised assessment of Potential project-related effects as a result of air emissions during construction, operation, and decommissioning in areas beyond the geographical scope of elevated atmospheric emissions are predicted.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

259	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning	Comment #ERFN-159: Denison note that there are several instances in which exceedances of air quality criteria for NO2, PM10 and uranium are expected, they were not identified for further assessment in the human health risk assessment, “as these COPCs are unlikely to be associated with a human health or environmental risk." The adequate rationale is not provided to dismiss these potential contributors to human health risk, and air quality exceedance of any COPC, should be sufficient rationale within itself to carry forward any factor. Question/Recommendation: ERFN are confused as to why Denison has chosen to dismiss the consideration of COPCs which exceed air quality criteria from further human health risk assessment. By removing these potential risk sources, Denison appears to be picking and choosing which factors are important prior to carrying out any analysis. ERFN recommend that Denison amend the Human Health Risk Assessment and include No2, PM10 and uranium as possible human health risk factors until appropriate evidence can be presented to demonstrate that these will not present harm.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
260	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning	Comment #ERFN-160: Denison notes that "a pond may be constructed beside the clean waste rock pad to collect runoff if required. Any runoff from the clean waste rock pond will be directed to the process water pond". This statement contradicts itself, as in the first sentence, Denison indicates that they may establish a water collection pond to collect runoff from the clean waste rock pile, however, this is followed by stating that runoff will be directed to the process water pond. It is unclear the purpose of this additional pond that may be constructed. Question/Recommendation: Denison should provide additional information on the rationale for the construction of this additional pond and what role it will play in both mitigating risk to human health and providing overall contact water management.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
261	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning	Comment #ERFN-161: It is unclear under which circumstances effluent may be discharged to Whitefish Lake as Denison states they intend to process water by circulating it through the injection and recovery wells. Question/Recommendation: Please provide additional information regarding the source of water to be discharged to Whitefish Lake	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
262	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning	Comment #ERFN-162: Denison appears to be confusing the application of multiple water quality applications. Specifically, they state: “The most restrictive federal or provincial guidelines for surface water quality, based on Canadian drinking water quality guidelines, are the CCME water quality guidelines for the protection of freshwater aquatic life, the federal environmental quality guidelines, and the Saskatchewan environmental quality guidelines." These are all separate water quality guidelines and apply to different aspects of water quality management. Question/Recommendation: Denison must be clear as to the guidelines which are being used at all times during the analysis to ensure that they are applied appropriately.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
263	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning	Comment #ERFN-163: Denison notes that effluent was assessed using a benchtop model simulation of the material processing and effluent treatment process. Using the derived effluent, a handful of constituents were assessed including cadmium, chromium, selenium, and lead. Other COPCs exist beyond these parameters and should be assessed appropriately. Question/Recommendation: Denison should perform additional broad-suite analysis of all parameters as set by CCME water quality guidelines for the protection of freshwater aquatic life and the Metal and Diamond Mining Effluent Regulations.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

264	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning	Comment #ERFN-164: Total dissolved solids (TDS) within itself is not known to be detrimental to the aquatic environment, however, can have adverse aesthetic impacts. That said, TDS is comprised of many other dissolved constituents, such as chloride, calcium, sodium, potassium, fluoride, and others, which may be harmful in elevated concentrations. Given TDS is expected to exceed the water quality guideline by more than 10-fold, it is necessary to identify the contributing factors before TDS can be ruled out as a potential risk. Question/Recommendation: Denison should provide an analysis of the constituents which contribute to high TDS and propose a method of reducing TDS to meet water quality guidelines.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
265	ERFN (February 22, 2023)	Section 10.1.4.2.1 Air Emissions During Construction, Operation, and Decommissioning; Table 10.1-4	Comment #ERFN-165: Molybdenum is concerningly high. CCME note that the long-term concentration of molybdenum for the protection of aquatic life is 0.073 ug/L which is several orders of magnitude less than what was observed in effluent tests. Similarly, sulphate is also very high, which once released into the environment may influence pH and acidification of the downstream environment. Question/Recommendation: Denison must demonstrate how it plans to minimize the source effluent of molybdenum and sulphate associated with this project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
266	ERFN (February 22, 2023)	Section 10.1.6.1.1 Human Receptors Selection and Characterization; Table 10.1-6	Comment #ERFN-166: The human receptors outlined in Table 10.1-6 are not fully representative of land users and those who may be impacted. There is a need to consider other more vulnerable human receptor groups such as youth, Elders, and pregnant females who interact with the land and consume high levels of traditional foods similar to Fisher/Trapper. Similarly, other human health receptors should be considered for permanent residents. Question/Recommendation: Denison should reanalyze their human health risk assessment including the use of vulnerable personas such as youth, pregnant female, and Elder.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
267	ERFN (February 22, 2023)	Section 10.1.6.1.3 Exposure Assessment and Pathway Modelling	Comment #ERFN-167: In assessing exposure pathways, it is noted that COPCs may travel through multiple ecological receptors before being consumed or otherwise taken up by humans. However, it is unclear whether Denison has considered the potential for bioaccumulation, additive, or synergistic effects when viewing the exposure pathway through a cumulative effects lens. Question/Recommendation: Denison should provide clarity into all assumptions which went into the pathway modelling including considerations for cumulative effects and bioaccumulation of COPCs en route to human end points.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
268	ERFN (February 22, 2023)	Section 10.1.6.1.4 Human Health Risk Assessment Results; Table 10.1-8	Comment #ERFN-168: Denison does not provide a Hazard Quotient (HQ) for Aquatic Plants. However, aquatic plants may be directly consumed by ERFN land users. As a result, this represents a knowledge gap within the assessment. Question/Recommendation: Denison should assess the hazard quotients associated with aquatic plant consumption. If no information related to the TVR is available use available proxy (e.g., terrestrial plants) to estimate a conservative hazard quotient.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
269	ERFN (February 22, 2023)	Section 10.1.6.1.4 Human Health Risk Assessment Results; Table 10.1-8	Comment #ERFN-169: Although in most cases project incremental HQ is not on its own a key driver in Project Total HQ exceeding individual or total benchmarks, the high baseline emphasizes the need to minimize additional inputs. ERFN does not accept arguments that suggest that since the baseline is already elevated, any additional inputs are negligible. Rather, any additional inputs only worsen the risks which are already present. Question/Recommendation: For all COPCs where individual or total HQs are above benchmarks, Denison must proactively identify solutions for minimizing additional inputs.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

270	ERFN (February 22, 2023)	Section 10.2.1.1 Valued Component Selection	Comment #ERFN-170: Denison notes that unwanted constituents, specifically iron and radium, will be removed from the recovered lixiviant material prior to uranium precipitation. This unwanted precipitate does however contain a valuable amount of uranium and therefore will be stored and shipped to be processed at an eligible licensed facility. It is unclear where this facility may be located, and furthermore, it is unclear whether the impacts of transportation of this material and the potential for accidents or malfunctions has been considered elsewhere in this EIS. Question/Recommendation: Denison must provide additional information about its plans to move waste products containing radium and uranium offsite for additional processing.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
271	ERFN (February 22, 2023)	Section 10.2.4 Mitigation Measures	Comment #ERFN-171: Mitigation measures should ensure there are redundant protections in place to minimize risk to worker health. Specifically, in any instance where the use of powered air purifying respirator (PAPR) will be effective in reducing radiation exposure, it should be applied. This then can be made redundant through the use of personal protective equipment such as the use of N95 or a self-contained breathing system. Question/Recommendation: Denison should take an additive approach rather than an either/or approach to identifying and applying mitigations for limiting radiation exposure to workers.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
272	ERFN (February 22, 2023)	Table 3.5-1: How Indigenous Knowledge was Incorporated into Existing Environment and Effects Assessment Sections	Comment #ERFN-172: Not all of the information in this table explains how the knowledge was incorporated or used to inform the effects assessment sections. Rather, in many instances, it states what the knowledge was instead of how it was used. Question/Recommendation: Provide a reference table identifying and acknowledging all of the information that was provided by ERFN and indicates how the information was incorporated and weighted into the assessment of the effects. If needed, ERFN can support by providing this information if the TK report is not clear enough.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
273	ERFN (February 22, 2023)	Section 4.1.2 Denison's Indigenous Peoples Policy and Investment and Sustainability Philosophy	Comment #ERFN-173: The EIS states that "Denison is committed to operating the Project in a fully sustainable manner, considering not only the maintenance of high standards of safety and environmental compliance." (p.4-3). It is not clear what "fully sustainable" means or how the definition was informed. Question/Recommendation: Provide clear definition, with backed-up literature and evidence, as to what "fully sustainable" means. Further, clarify how ERFN values were included in the understanding of "fully sustainable." That is, has this definition been informed by Indigenous Knowledge and worldviews, and if so, then how have project planning and activities adjusted and if not, then provide an explanation as to why.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
274	ERFN (February 22, 2023)	Section 11.0 Land and Resource Use General comment	Comment #ERFN-174: Denison has separated out the quality of life, land and resource use, economics and other VCs as if they can be considered separately. Question/Recommendation: Provide an explanation as to how land and resource use was considered in quality of life effects assessment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
275	ERFN (February 22, 2023)	Section 11.0 Land and Resource Use	Comment #ERFN-175: Repeatedly, Denison states that there is "limited amount of Indigenous uses in proximity to the Project" and it appears these conclusions have been made from Denison's interpretation of ERFN's TK report. It was made clear to Denison that there is extensive use in the area and that the report is limited in scope and is not statistically representative of ERFN rights holders. Further, Denison has failed to frame the EIS from a rights-based approach. The rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the Constitution Act, 1982 (Section 22(1)(c)) are collective rights, and assuming minimal impact based on the inaccurate understanding of a few land users does not adequately assess impacts to Indigenous Rights. Other instances of inaccurate wording of use include:	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			- "Overall, given the limited use of the ILRU LSA, adverse effects that are low in magnitude, the limited geographic extents of effects, and the reversibility of effects, the conclusion relative to changes to ILRU is not significant." - "The absence of the Key Lake gate and the removal of the process of providing identification will provide recreational users and local Indigenous communities with greater access to the ILRU LSA, which is not currently used intensively" (p. 11-70 – emphasis added) - "Overall, given limited use of the ILRU LSA, adverse effects that are low in magnitude, the limited geographic extents of effects, and the reversibility of effects, the conclusion relative to changes to ILRU is not significant." (p. 11-74) - "Big game hunting is absent in the Project Area and is sparse and infrequent in the ILRU LSA. Indigenous harvests of terrestrial species are primarily conducted south of the Key Lake gate and/or closer to communities." (p.11-49) Question/Recommendation: ERFN made it clear in their submissions that the information provided was not statistically representative and does not include the entire IK or land use of ERFN members. ERFN's Traditional Knowledge Study & Health and Socio- Economic Study Report states: "the results in this Study showcase the information shared by some of ERFN's land users, trappers and Elders and cannot be considered a complete representation of ERFN knowledge and use in the Study Area. Nevertheless, these results demonstrate that the Project is likely to have significant impacts on ERFN's Aboriginal and Treaty Rights and Interests without appropriate and effective measures including mitigation, accommodation, monitoring/follow- up, environmental management and protection planning, along with an ongoing role in environmental oversight. ERFN continues to assert that it is only through a collaborative and co-production approach to the EA that these measures will be appropriately designed and implemented." There remains a disconnect between Denison's conclusions of impacts and the results that were provided in ERFN's Traditional Knowledge Study & Health and Socio- Economic Study Report. Denison must ensure that it considers the collectively held rights of ERFN protected by section 35 of the Constitution Act and Treaty 10. Individual ERFN land users have important interests to be considered, and in some instances, they exercise rights held by the collective. However, such users do not represent the constitutional interests of the collective; the elected Chief and Council bear that critical and all-encompassing responsibility Denison must recognize that inherent Aboriginal rights or Treaty Rights must not be infringed upon, and where impacts cannot be avoided, accommodation measures must be complete. (i) Provide reasoning as to why these statements were made and evidence that Denison understands the impact that these statements have. That is, they belittle the information provided and misrepresent potential impacts on the collective rights of ERFN. (ii) Provide adequate funding for ERFN to undertake a comprehensive Rights Impact Assessment that is led independently by ERFN (iii) It is expected that Denison will remove all of these inaccurate statements, and all other similar statements in the EIS, and re-evaluate impacts based on an understanding of collective rights and recognition of the cumulative impacts of past activities	
276	ERFN (February 22, 2023)	Section 11.1.7 Cumulative Effects	Comment #ERFN-176: The EIS states, "existing projects were not considered as part of the CEA because they were captured and assessed within baseline conditions" (p. 11-69). However, Denison has not shown how CE from past projects was acknowledged within the baseline of ILRU. Rather, in many instances, as noted above, Denison has misinterpreted ERFN's Traditional Knowledge Study & Health and Socio- Economic Study Report. There is limited recognition of the discussion on impacts from past projects and how this has altered current baseline conditions, including the likelihood that current baseline conditions have moved beyond ERFN's acceptable threshold of impact. Question/Recommendation: Until Section 11.1.7, and Section 11 in general, adequately considers cumulative effects of past projects and impacts to ERFN's harvesting activities, and ability to access ancestral lands as they were prior to contact from a rights-impacts lens, Section 11.1.7 is considered inadequate and incomplete.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

277	ERFN (February 22, 2023)	Section 11.1.5 Mitigation Measures	Comment #ERFN-177: Denison has stated that there will be no further mitigation or monitoring for Resource Availability, Availability of Lands/Waters, and in general ILRU monitoring. This is unsatisfactory as ERFN is in disagreement that impacts to ILRU will not be significant. Question/Recommendation: Prior to approval, Denison needs to work with ERFN to develop a program that monitors changes to ERFN's relationship and use of the area. This needs to be led by ERFN and occur with frequency across all phases of the project. It will provide relevant and useful information to Denison and ERFN to monitor potential changes and impacts from the project and any additional monitoring activities that may need to occur.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
278	ERFN (February 22, 2023)	Section 11.1.4.5.1 Aesthetic Experience	Comment #ERFN-178: Denison states that "to control road dust during summer (May to October), water and/or chemical dust suppressant will be applied to all site roads (Section 6.1.5 in Section 6)." p. 11-56. There is no description of chemical dust suppressant and Section 6.1.5 only indicates that water will be used twice daily as a dust suppressant. Question/Recommendation: (i) Confirm how dust will be managed – is it water or chemical dust suppressant? (ii) If the latter, provide information on the product that will be used and all impacts to plants and wildlife.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
279	ERFN (February 22, 2023)	Section 11.1.4.3 Resource Availability for Subsistence Harvesting	Comment #ERFN-179: With respect to furbearer habitat, Denison states "effects are predicted to belong-term but reversible because the alteration of available furbearer habitat is expected to be reversed as sensory disturbances diminish with the end of Project Operation activities and subsequent Decommissioning of Project components." p. 11-50. While there is recognition that this impact may be reversible to furbearing animals, it is not clear how this is a reversable to the used of the area by ERFN. This long-term impact will last for at least a generation. It is clear from past projects, settlements, and colonial activities that a lot of knowledge can be lost within a generation when you remove the access and ability for knowledge transfer. Question/Recommendation: Provide an explanation as to how predictions across all of section 11.1.4 considered potential for contribution to the degradation of cultural practices and knowledge transfer. Provide analysis on the potential impacts of project activities on knowledge transfer and land use for ERFN citizens who have rights across their entire ancestral territory. This needs to be done with the assumption that removal of an area for land use will result in an impact to ERFN's collectively held section 35 rights.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
280	ERFN (February 22, 2023)	Section 11.1.3.2.1 English River First Nation/Patunuak	Comment #ERFN-180: There is concern as to how well Denison reviewed the reports from ERFN. For example, in Section 11.1.3.2.1 English River First Nation/Patunuak on p. 11-30 Denison states "no access routes or culture/historical trails were identified as intersecting with the Project site (ERFN and SVS 2022b)." ERFN dispute this statement and urge Denison to re-review ERFN's report and remind Denison of the information provided in this report: "Participants spoke of using the Fox Lake Road, which runs through the Wheeler River Project site, as an access route for harvesting activities throughout an area stretching from the Key Lake mine to McArthur River mine … One participant expressed concerns that this route (1018-14) may be blocked by Project activity. Another participant stressed how this entire area (1004-18) is used by ERFN people as a contemporary gathering place." Question/Recommendation: Denison will need to do a more carefully review of ERFN's reports and include all information provided in the EIS. That is, all information summarized will need to be confirmed for accuracy and gaps in the information summarized will need to be filled.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
281	ERFN (February 22, 2023)	Section 11.1.3 Existing Environment	Comment #ERFN-181: This section does not adequately discuss or highlight the history and experience of ERFN. Additional valuable information that frames the existing environment and impacts to land use was provided in ERFN's Traditional Knowledge Study & Health and Socio-Economic Study Report. Question/Recommendation: Provide ERFN with the capacity and opportunity to edit and add to this section so that the EIS is framed with additional and relevant information.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

282	ERFN (February 22, 2023)	Section 16.6.3 Heritage Resources	Comment #ERFN-182: Heritage Resource Management Plan. Question/Recommendation: In Section 16.6.3 Denison states that a "Heritage Resources Management Plan (HRMP) has been developed by Denison and outlines the steps that will be taken should anymore archaeological sites be identified Even though they say that these steps include "discussions with local indigenous leadership." this is not evident. Prior to this document being approved, ERFN requests the opportunity to complete a third-party review and provide feedback to Denison.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
283	ERFN (February 22, 2023)	Section 16.6.3	Comment #ERFN-183: Cultural Heritage Monitors. Question/Recommendation: Prior to the approval of the project, Denison must commit to hiring ERFN Cultural Heritage Monitors who will be present during any construction and/or land disturbance work. This area is still considered to have high potential for archeological sites even if Denison was not able to locate many sites during their assessments.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
284	ERFN (February 22, 2023)	Section 12.1.2.1, 12.2.2.1, 12.3.2.1 Influence of Indigenous Knowledge, Local Knowledge and Engagement on the Assessment, English River First Nation	Comment #ERFN-184: EIS Section 12.1.2.1, 12.2.2.1, and 12.3.2.1 sets out a list of the submissions and reports provided by ERFN that included Traditional Knowledge and perspectives that have informed Section 12.1, 12.2 and 12.3 of the assessment respectively. ERFN notes that these lists do not include ERFN's submission of comments to Denison on a draft of the EIS provided to ERFN before its submission to CNSC, despite this submission including important information regarding our Traditional Knowledge and perspectives that was meant to inform changes to these sections of the Draft EIS. ERFN notes that as a result, numerous comments on this section of the EIS below are a restatement of concerns raised in our August 2022 submission that remain unaddressed. ERFN also notes that the contents of ERFN's August 2022 submission are also not reflected in Table 4.3-2 which is meant to outline Key Issues and Concerns raised English River First Nation in previous engagements and submissions and demonstrate how these comments have been addressed or considered in the Draft EIS. Question/Recommendation: Section 12 must be updated to incorporate the concerns raised in the August 2022 submission and restated in the comments below. In addition, Table 4.3-2 should be updated to reflect the Key Issues and Concerns raised in ERFN's August 2022 submission and demonstrate how these comments have been addressed or considered in Section 12 of the EIS.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
285	ERFN (February 22, 2023)	Section 12.1.1.2 Key Indicators and Measurable Parameters	Comment #ERFN-185: Section 12.1.1.2 states that a Key Indicator (KI) "is an important aspect of a VC that may be affected by the Project and its activities" and that a measurable parameter "is the metric associated with the KI that can be used to characterize changes to attributes of the environment that may change as a result of the Project and/or other human developments and natural factors" (p. 12-7). For the valued component of Cultural Expression and this section of the assessment, Table 12.1-1 sets out Denison's selection of KIs to include: 1. Knowledge Transfer 2. Traditional diet While ERFN is supportive of Cultural Expression being included as an important facet of Quality of Life and identified as a key value component included in the scope of the effects assessment, the KIs and measurable parameters selected by Denison in Section 12.1.1.2 are insufficient and do not reflect a holistic consideration of Cultural Expression, even by Denison's own definition set out in Section 12.1. ERFN notes that concerns have been raised in previous engagement with ERFN and in our August 2022 submission of comments on the Draft EIS regarding the limited scope of these KIs and that additional KIs and measurable parameters must be included to reflect a more holistic understanding of Cultural Expression informed by Indigenous perspectives. Because the selection of these KIs and measurable parameters is a foundational step in the assessment that informs the scope and approach to the subsequent characterization of existing conditions, assessment of project-related effects, identification of	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			mitigation measures and assessment of residual effects and cumulative effects, the insufficient scope of KIs and measurable parameters selected by Denison therefore results in a fundamental deficiency of Section 12.1 of the assessment of the effects. Section 12.1 should be revised to include an analysis of additional KIs and measurable parameters of Cultural Expression more closely related to values identified for protection by ERFN citizens. These may include: - Ability to practice traditional activities - Cultural Identity - Connection to ERFN Traditional Territory - Ability to speak ERFN dialects of Dene and Cree - Intergenerational knowledge transfer - Collecting, processing, using, and sharing traditional medicines - Spiritual and cultural vitality	
286	ERFN (February 22, 2023)	Section 12.1.4.1 Potential Project – Valued Component and Key Indicator Interactions	Comment #ERFN-186: Table 12.1-2 outlines potential interactions between project phases and activities, and KIs for Cultural Expression. ERFN notes that Employment and Expenditures are not identified to have potential interactions. ERFN disagrees with this assessment as employment may alter the ability for ERFN citizens to engage in traditional activities and intergenerational knowledge transfer, as citizens will be unable to engage in on-the-land activities and cultural knowledge sharing during rotational work periods. Question/Recommendation: Denison should revise Table 12.1-2 to recognize potential interactions between employment and KIs for Cultural Expression	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
287	ERFN (February 22, 2023)	Section 12.1.6 Residual Effects Evaluation	Comment #ERFN-187: Section 12.1.6 of the EIS defines a significant adverse residual effect on Cultural Expression as “an effect that is highly different from baseline conditions and trends and cannot be managed or mitigated through adjustments to existing programs, policies, or other mitigation.” The EIS goes on to state that “because residual adverse effects on Cultural Expression are not expected to result in this level of change, effects are expected to be not significant for the Project.” ERFN does not agree with this assessment of the potential residual effects of the Project, which is fundamentally deficient based on the limited scope of KIs and measurable parameters that were selected for analysis. ERFN also does not agree that the mitigation measures presented in Section 12.1.5 are sufficient to address effects of the Project on Cultural Expression that will be highly different from baseline conditions. Question/Recommendation: Until Section 12.1 is revised to include a more holistic consideration of KIs and measurable parameters for Cultural Expression that ERFN has set out above, Denison’s assessment of the nature of potential Residual Effects should be considered incomplete and deficient. In addition, until ERFN confirms CNSC that Denison and ERFN have reached mutually agreed- upon terms of mitigation and accommodation that address the effects of the Project on Cultural Expression, this EIS should not be considered complete or approved by CNSC. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
288	ERFN (February 22, 2023)	Section 12.2.1.2 Key Indicators and Measurable Parameters	Comment #ERFN-188: Section 12.2.1.2 states that a Key Indicator (KI) “is an important aspect of a VC that may be affected by the Project and It’s activities” and that a measurable parameter “Is the metric associated with the KI that can be used to characterize changes to attributes of the environment that may change as a result of the Project and/or other human developments and natural factors” (p. 12-44). For the valued component of Community Well-Being and this section of the assessment, Table 12.2- 1 sets out Denison’s selection of KIs to include: 1. Population and Demographics (from in/out migration as people seek employment opportunities), 2. Income of local workers (from participation in employment and/or contracting activities), and 3. Community cohesion (from changes in income and participation in a commuter rotation system). While ERFN is supportive of Community Well-Being being identified as a key value component	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			and included in the scope of the effects assessment, the KIs and measurable parameters selected by Denison are insufficient and do not reflect a holistic consideration of well- being informed by Indigenous determinants of well-being, despite Denison's acknowledgment that communities in the LSA are predominantly (95.2%) Aboriginal (Section 12.2.3.1, p. 12-56). ERFN notes that concerns have been raised in previous engagement with ERFN and in our August 2022 submission of comments on the Draft EIS regarding the limited scope of these KIs and that additional KIs and measurable parameters must be included to reflect a more holistic understanding of Community Well-Being informed by Indigenous perspectives. Because the selection of these KIs and measurable parameters is a foundational step in the assessment that informs the scope and approach to the subsequent characterization of existing conditions, assessment of project related effects, identification of mitigation measures and assessment of residual effects and cumulative effects, the insufficient scope of KIs and measurable parameters selected by Denison therefore results in a fundamental deficiency of Section 12.1 of the assessment of the effects. Question/Recommendation: ERFN has shared with Denison (ERFN and SVS 2022a), that the four components of ERFN health and well-being, often referred to as the "the medicine wheel," is the core guiding principle to overall ERFN health and well-being, and include: - Physical health - Mental health - Spiritual health - Emotional health The KIs selected by Denison and subsequent steps of the assessment of the effects must be amended to include more holistic Kis and parameters relevant to these ERFN determinants of Community Well-Being, in collaboration with ERFN and based on the results of studies and submissions provided by ERFN to date. Potential Kis/parameters could include, but are not limited to: - Food security - Access to traditional foods - Psychosocial Impacts - Spiritual and cultural vitality o Ability to practice traditional activities o Cultural Identity o Connection to ERFN Traditional Territory o Ability to speak ERFN dialects of Dene and Cree o Intergenerational knowledge transfer o Collecting, processing, using, and sharing traditional medicines	
289	ERFN (February 22, 2023)	Section 12.2.4.1 Potential Interactions Between the Project and Valued Components/Key Indicators	Comment #ERFN-189: In Section 12.2.4.1, Denison sets out the assessment of potential interactions between the Project and VC/KIs, based on "IK, LK, discussions with Indigenous groups, government agencies, and the public, KPIs for the Project, the professional judgment of members of the Project team, and consideration of existing conditions in the study areas for the VCs and KIs" (Page 12-73). ERFN notes the only project activities Denison has determined will interact with the VC/KIs considered in this section of the assessment are employment and expenditures, and Denison states that no other construction activities, operation activities, or decommissioning activities are anticipated to have any interactions with Community Well-Being. ERFN does not agree with this assessment of the Project's potential interactions with Community Well- Being, and it is ERFN's position that numerous other Project activities will have potential adverse effects on ERFN's Community Well-Being. Question/Recommendation: This assessment should be considered incomplete and fundamentally deficient. The assessment must be redone with a more holistic consideration of KIs and pathways to effects developed in collaboration with ERFN and based on the results of studies completed by ERFN to date.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

290	ERFN (February 22, 2023)	Section 12.2.4.2 Potential Project Related Effects	Comment #ERFN-190: While Section 12.2.4.2.1 does consider the effects of population changes related to the Project on demand for housing and general concerns with the in- and-out migration of LSA residents, it doesn't address the full range of potential impacts associated with a transient workforce. Question/Recommendation: Section 12.2.4.2 must include an assessment of all potential effects of a transient workforce and changes to population dynamics, including those disproportionately experienced by women and other segments of the population. This should incorporate findings of research like the 2017 study completed by Lake Babine Nation and Nak'azdli Whut'en (Indigenous Communities and Industrial Camps), and/or related research in the context of the LSA.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
291	ERFN (February 22, 2023)	EIS Section 12.2.4.2 Potential Project Related Effects	Comment #ERFN-191: While Section 12.2.4.2.2 does include consideration of the effects of increased income on existing issues for LSA residents including substance abuse and domestic violence, corresponding mitigation measures in Section 12.2.5 are limited to training and programming on the Project site, which is not sufficient to address these potential impacts and should not be considered sufficient to prevent residual effects. Question/Recommendation: Section 12.2.5 must also include Denison's commitments to support the establishment and improvement of social services and wellness programs located in, led and implemented by each of the Indigenous communities in the LSA through the provision of funding and other resources.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
292	ERFN (February 22, 2023)	EIS Section 12.2.4.2 Potential Project-Related Effects	Comment #ERFN-192: Despite acknowledging in its characterization of the existing environment for income of local workers in Section 12.2.3.2 that "the traditional economy in the LSA provides important non-cash income to citizens and contributes to the overall sense of well-being for communities" (p. 12-64), and that "Wheeler River is a culturally and economically important area for ERFN and a place where fishing, hunting, and trapping occur throughout the year" (p. 12-65), the assessment of potential project related effects for this KI in Section 12.2.4.2 only considers effects on personal income for residents of the LSA through employment on the Project. Question/Recommendation: The assessment of effects for income and financial well-being must be expanded to include participation in the traditional and subsistence economy, the Project's potential effects on ERFN's fishing, hunting and trapping and the relationship between participation in the traditional economy and the overall sense of well-being for communities, which Denison acknowledges in Section 13.3.2.3.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
293	ERFN (February 22, 2023)	EIS Section 12.2.4.2 Potential Project-Related Effects	Comment #ERFN-193: Despite acknowledging in its characterization of the existing environment for community cohesion in Section 12.2.3.3 that ERFN's practice of traditional activities such as hunting, fishing, trapping and gathering is a crucial component of community cohesion and well-being (p. 12-70), Denison's assessment of effects for this KI in Section 14.2.4.2.3 only considers time spent by LSA residents employed by the Project away from their communities and families during work rotation. While employment and participation in the Project by ERFN citizens is optional, the Project has broader direct impacts on the Ancestral Territory, effecting all ERFN citizens. Therefore, regardless of whether employment interferes with aspects of Community Well-Being, the existence of the Project will change the manner in which all ERFN citizens interact with Nuhtsiye-kwi Benéne, and in turn ERFN's overall community cohesion, Community Well-Being and Quality of Life. Question/Recommendation: The assessment of effects for community cohesion must be expanded to include all the Project's potential effects on ERFN's practice of traditional activities, including fishing, hunting and trapping.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
294	ERFN (February 22, 2023)	Section 12.2.6 Residual Effects Evaluation	Comment #ERFN-194: Section 12.1.6 of the EIS defines a significant adverse residual effect on Cultural Expression as "an effect that is highly different from baseline conditions and trends and cannot be managed or mitigated through adjustments to existing programs, policies, or other mitigation." The EIS goes on to state that "because residual adverse effects on Cultural Expression are not expected to result in this level of change, effects are expected to be not significant for the Project." ERFN does not agree with this assessment of the potential residual effects of the Project, which is fundamentally deficient based on the limited scope of KIs and measurable parameters that were selected for analysis. ERFN also does not agree that the mitigation measures presented in Section 12.2.5 are sufficient to address effects of the Project on Cultural Expression that will be highly different from baseline conditions.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			Question/Recommendation: Until Section 12.2 is revised to include a more holistic consideration of KIs and measurable parameters for Community Well-Being that ERFN has set out above, Denison's assessment of the nature of potential Residual Effects should be considered incomplete and deficient. In addition, until ERFN provides confirmation to CNSC that Denison and ERFN have reached mutually agreed upon terms of mitigation and accommodation that address the effects of the Project on Community Well-Being, this EIS should not be considered complete or approved by CNSC. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	
295	ERFN (February 22, 2023)	Section 12.3.3.1 Methods and Limitations	Comment #ERFN-195: Traffic volume data for Highways 914 and 165 are based on short term traffic counts conducted over a 48- hour counting period, however, continuous traffic monitoring data and subsequent average daily traffic volume reports are not produced for these highways. This traffic data is infrequently updated and only provides a snapshot of actual traffic conditions which may not be representative of actual conditions. The impacts of the Project to ERFN's rights and interests related to increased traffic and access to the Project area is a crucial concern, and an accurate baseline of traffic data is vital to the integrity of the subsequent assessment of potential effects, development of mitigation measures, residual effects evaluation and characterization of cumulative effects. Question/Recommendation: Denison should establish long-term traffic monitoring stations along Highway 914 and 165 to provide a more accurate description of existing traffic conditions along these key access routes for the Project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
296	ERFN (February 22, 2023)	Section 12.3.6.1 Residual Effects Characterization	Comment #ERFN-196: Denison states a significant effect on the Infrastructure and Services VC (including the measurable parameters of traffic and community infrastructure and services, and emergency services) would result if projected demands are above the current capacity, are routinely above the current levels for an extended period of time, are unlikely to return to existing conditions, and cannot be mitigated through adjustments to programs, policies, plans, or through other mitigations. Local and regional emergency services are limited and could be easily overwhelmed by even moderate scale emergencies. Question/Recommendation: Denison must demonstrate plans to be largely self-reliant on internal emergency response measures, and able to sustain emergency management until transportation is available to or from the Project area either by air or ground.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
297	ERFN (February 22, 2023)	Section 12.3.4.2.1 Potential Effect 1 – Change in Traffic	Comment #ERFN-197: While Section 12.3.4.2.1 describes Denison's assessment of changes to traffic volume during Project construction, operation and decommissioning, this section of the EIS does not go onto describe how the effects of increased traffic may interact with traditional land use and Quality of Life, which is the overall valued component considered in Section 12 of the EIS. Question/Recommendation: Section12.3.4.2.1 should be modified to include an analysis of how the Project's change to traffic conditions and road use will result in effects to traditional land use and Quality of Life, and include mitigation measures to address these potential effects.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
298	ERFN (February 22, 2023)	Section 13.1 Scope of the Assessment	Comment #ERFN-198: The guiding questions are narrowly focused and could be expanded to understand impacts from a GBA+ perspective. The questions do not ask how the Project will help to retain economic benefits for LSA communities. Question/Recommendation: The assessment could be enhanced by reviewing the findings from a GBA+ perspective. The assessment should make clear recommendations to help LSA maximize potential economic effects.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

299	ERFN (February 22, 2023)	Section 13.1 Scope of the Assessment	Comment #ERFN-199: "Characterize existing conditions"; This could be enhanced by forecasting the baseline conditions without the project to match the temporal boundaries of the project, as well as characterizing existing conditions. Forecasting key indicators and measurable parameters without the project based on trends and existing conditions could enhance the assessment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
300	ERFN (February 22, 2023)	Section 13.1.2 Key Indicators and Measurable Parameters	Comment #ERFN-200: Based on the Terms of Reference, the Traditional Economy could be a separate VC. However, the Draft EIS considers Traditional Economy as a KI. Question/Recommendation: Given the importance of the Traditional Economy to ERFN, selecting it as a separate VC with a set of Key Indicators could enhance the assessment and monitoring of the potential Project's effects.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
301	ERFN (February 22, 2023)	Section 13.1.2 Key Indicators and Measurable Parameters	Comment #ERFN-201: Typo, the Economy VC is comprised of five, not four KIs. Question/Recommendation: Please fix typo.	The typo is corrected in the EIS Section 13.1.2.
302	ERFN (February 22, 2023)	Section 13.1.2 Key Indicators and Measurable Parameters	Comment #ERFN-202: Direct/Indirect/Induced for employment and income – Direct employment/income could be outside of the LSA or RSA. Question/Recommendation: Acknowledge that Direct employment in this assessment is limited to the direct employment by Denison and contractors in the Study areas.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
303	ERFN (February 22, 2023)	Section 13.1.2 Key Indicators and Measurable Parameters	Comment #ERFN-203: Indirect/Induced for employment; the suggested measure for indirect and induced employment is aggregated employment and unemployment rates; Input-output modelling could be used to estimate indirect and induced employment. Question/Recommendation: Enhance measurement of indirect and induced employment through input-output modelling. This would help understand the other enabled employment impacts of the project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
304	ERFN (February 22, 2023)	Table 13.1-1: Key Indicators and Measurable Parameters for Economy	Comment #ERFN-204: Measurable parameters employment and training; employment is limited to direct project-related employment opportunities. There are 2 issues: 1. It is implied that many of these opportunities will be captured by fly- in/fly-out workers that won't impact the LSA. 2. There's no estimating of the quantity of indirect and induced employment. Indirect and induced employment can often represent the same number of jobs provincially as direct employment. The question for all these jobs is how many of them will be captured in the LSA and RSA. Recommendations: 1. Estimate indirect and induced employment impacts using input- output modelling. 2. Estimate the number of direct and indirect jobs that will be captured in the LSA and RSA vs. out of the study area. Induced jobs in the study areas could be proportional to the percentage of	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			total direct and indirect jobs captured in the study areas. Regardless of the methodology Denison uses, an estimate of the economic impact on local employment in the LSA and RSA would add to the assessment.	
305	ERFN (February 22, 2023)	Table 13.1-1: Key Indicators and Measurable Parameters for Economy	Comment #ERFN-205: Measurable parameters – Income; Wages and salaries paid by Denison are only part of the income impact in the study areas. Not all the income will be captured in the study areas, and some income will be generated through indirect and induced activities. Question/Recommendation: Income impacts in the community should be based on the same employment capture assumptions that are used for capturing employment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
306	ERFN (February 22, 2023)	Table 13.1-1: Key Indicators and Measurable Parameters for Economy	Comment #ERFN-206: Measurable parameters – Income; Income disparity is not included in the measurable parameters; Projects that can create relatively high-paying jobs for some of the residents in a community can create income disparity. This can result in increases in household costs for all residents. The impact of the project on income disparity could be important. Question/Recommendation: Consider adding income disparity as a measurable parameter of the Income key indicator.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
307	ERFN (February 22, 2023)	Table 13.1-1: Key Indicators and Measurable Parameters for Economy	Comment #ERFN-207: Business opportunities does not look at the impact of the project on the labour supply for existing businesses. Relatively high-paying jobs associated with the project could result in existing businesses not being able to hire and retain the employees necessary to operate their businesses. Question/Recommendation: The assessment could be enhanced by including impact on labour for existing businesses as a measurable parameter for the Business Opportunities Key Indicator.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
308	ERFN (February 22, 2023)	Table 13.1-1: Key Indicators and Measurable Parameters for Economy	Comment #ERFN-208: Measurable parameters: Doesn't specify that measurable parameters will be looked at in a disaggregated fashion. Question/Recommendation: The assessment could be enhanced by collecting disaggregated data on these measurable parameters when it was available. Project impacts of the key indicators are likely not homogeneous across all demographic factors.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
309	ERFN (February 22, 2023)	Section 13.1.3.2 Temporal Boundaries	Comment #ERFN-209: The existing environment focuses on the past three census periods (2006, 2011, 2016). The assessment would benefit from reviewing and incorporating data from the latest census. Question/Recommendation: Incorporate demographic and economic data from the 2021 Census.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

310	ERFN (February 22, 2023)	Section 13.1.3.2 Temporal Boundaries	Comment #ERFN-210: The temporal boundaries seem appropriate, but the existing conditions without the project do not forecast what the measurable indicators will be without the project. Question/Recommendation: Forecast baseline measurable indicators without the project for the temporal boundaries presented in the assessment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
311	ERFN (February 22, 2023)	Section 13.2 Existing Environment	Comment #ERFN-211: Most of the data presented in 13.2.1.4/13.2.1.5/13.2.1.6 only shows percentages of participation. The associated nominal values are unclear. Question/Recommendation: Because the nominal values are important for understanding the scale of impact of the project, add nominal values throughout the sections. This is important because the entire LSA has only 875 people in their labour force. How is that spread across the different communities? Small changes in these variables could be material to the different communities.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
312	ERFN (February 22, 2023)	Section 13.2.1 Key Indicator: Employment and Training	Comment #ERFN-212: The Draft EIS stated, “due to the small populations of La Plonge and Patuanak, data from Statistics Canada have been suppressed to protect confidentiality. Accordingly, data for the LSA are not fully representative, but the effect on reported statistics is believed to be minimal at the LSA level, given the low population of those two localities” (p. 13-18). Question/Recommendation: The random rounding for small populations makes the census data unreliable as an absolute indicator. Denison has done a good job using qualitative interview data to add to the baseline understanding of unemployment. Given the challenges in the census at capturing unemployment for these small populations, specific details for measuring unemployment as part of the monitoring plan would be valuable.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
313	ERFN (February 22, 2023)	Section 13.2.1 Key Indicator: Employment and Training (all indicators)	Comment #ERFN-213: The data are not presented from a GBA+ perspective, limiting the assessment’s estimate of the Project adverse or disproportionate impacts separated based on gender, sexual orientation, race, or other factors which have historically been used to disadvantage populations interacting with mining projects. Question/Recommendation: Complete the assessment using a GBA+ framework. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
314	ERFN (February 22, 2023)	Section 13.2.1.5 Employment by Sector	Comment #ERFN-214: The employment by industry sector shows that the LSA has a higher concentration of employment in mining than the RSA and the province as a whole. This suggests that not all the jobs associated with the project will go to a fly-in/fly-out work force. Employment in the LSA could be impacted by the project: Many workers are already in the mining industry. Question/Recommendation: Do not rule out effects due to the fly-in/fly-out nature of the project (municipal revenue, indirect and induced employment, and income).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
315	ERFN (February 22, 2023)	Section 13.2.2.1 Total Personal Income	Comment #ERFN-216: Personal Income data is presented for the LSA for Indigenous and non-Indigenous individuals, but the make- up of the population (Indigenous vs non- Indigenous) was not presented. Question/Recommendation: Include nominal values to show the size of the Indigenous and non-Indigenous populations in the LSA.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

316	ERFN (February 22, 2023)	Section 13.2.3 Key Indicator: Traditional Economy	Comment #ERFN-218: Some baseline data is missing from this section. Traditional economy baseline data is presented in the project's effects section for the first time. Specifically, the commercial harvester who had traplines near the project site was not identified in this section, nor was the typical locations of non-commercial harvesting identified. These are referenced in the effects section. It would be helpful if they were previously introduced. Question/Recommendation: Add the baseline elements of the Traditional Economy referenced in the effects section to the baseline section.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
317	ERFN (February 22, 2023)	Section 13.2.3 Key Indicator: Traditional Economy	Comment #ERFN-219: Kineepik Métis Local and Pinehouse Lake member concerns and thoughts about the impact of the project should likely be in the effects section, not the baseline. Question/Recommendation: Move information related to the effects of the project to the project effects section.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
318	ERFN (February 22, 2023)	Section 13.2.4 Key Indicator: Business Opportunities	Comment #ERFN-220: There is no discussion on challenges local businesses have in finding labour to operate their businesses. Question/Recommendation: Adding the challenges of local businesses to finding labour would enhance this section.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
319	ERFN (February 22, 2023)	Table 13.3-1: Potential Project Interactions for Economy	Comment #ERFN-221: The Traditional Economy may have interactions with other phases/activities of the Project, and the interactions are not limited to only employment and expenditures. Project activities and the presence of the Project may interact with current and future Traditional users. Question/Recommendation: Work with traditional users and Knowledge Holders to review the approach of outcomes of the assessment to the Traditional Economy.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
320	ERFN (February 22, 2023)	Section 13.3.2 Potential Project-related Effects	Comment #ERFN-222: The assessment does not quantify anticipated effects for LSA communities and relies on a qualitative and subjective assessment. Question/Recommendation: Review existing baseline data and run scenarios (best, likely, worst case) to estimate potential capture with the LSA for economic benefits. Denison should conduct an analysis to estimate KI changes in LSA and RSA.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
321	ERFN (February 22, 2023)	Section 13.3.2.1 Potential Effect 1 – Employment and Training (p.13-61)	Comment #ERFN-223: The Draft EIS states, "training programming will be determined in consultation with COI and are anticipated to involve existing training facilities and programs (Process Operation Technical [SIIT] Meadow Lake, Chemical Technology [Saskatchewan Polytechnic]) as well as specific ISR training, where required. Denison will initially prioritize Indigenous and non-Indigenous communities in the LSA in terms of employment and training opportunities" (p. 13-61). However, Denison has not made firm commitments as of now. Question/Recommendation: (i) Clarify how Denison plans to prioritize Indigenous and non-Indigenous local communities in terms of employment and training. (ii) Establishing a local recruitment and training centre within a nearby community would enhance the positive impacts of the Project on Employment and Training.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

322	ERFN (February 22, 2023)	Section 13.3.2.1 Potential Effect 1 – Employment and Training	Comment #ERFN-224: Presentation of historic baseline participation and employment rates in the effects section. The effects of the project on these measurable indicators are missing. Question/Recommendation: Remove the presentation of baseline data of these indicators. Add the estimated effects of the project on these indicators.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
323	ERFN (February 22, 2023)	Section 13.3.2.1 Potential Effect 1 – Employment and Training	Comment #ERFN-225: The draft EIS states, "training opportunities are anticipated to be delivered by institutions in northern Saskatchewan or Saskatchewan more broadly and will be determined in consultation with LSA communities" (p. 13-64) Question/Recommendation: Supporting local hiring practices through the establishment of a local recruitment and training centre within a nearby community for ensuring Indigenous and non-Indigenous members have a pathway to having higher quality positions than general labour or junior positions. This would enhance the positive Project impact on Employment and Training.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
324	ERFN (February 22, 2023)	Section 13.3.2.3 Potential Effect 3- Traditional Economy	Comment #ERFN-226: The potential effects on the Traditional Economy are likely underestimated. The erosion of traditional economic practices resulting from the cumulative effects of resource projects is a concern voiced by ERFN. Question/Recommendation: Work with traditional users and Knowledge Holders to develop a robust compensation plan, considering future users.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
325	ERFN (February 22, 2023)	Section 13.3.2.4 Potential Effect 4 – Business Opportunities	Comment #ERFN-228: The impact of the project on business to hire and retain labour to support existing business operations has not been addressed. Question/Recommendation: Forecast the impact of the project on existing businesses access to labour to support existing operations.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
326	ERFN (February 22, 2023)	Section 13.3.2.4 Potential Effect 4 – Business Opportunities	Comment #ERFN-229: The Draft EIS states, "Denison has established an internal procurement approach that requires the procurement of all goods and services for the Project to first consider businesses based within the LSA communities prior to looking elsewhere in northern Saskatchewan, southern Saskatchewan, and/or outside of Saskatchewan throughout all phases of the Project" (p. 13-68). There were limited specifics associated with this commitment. Question/Recommendation: Clarify how Denison plans to develop procurement strategies that favour local works and businesses. Engage Indigenous and non-Indigenous businesses in the development of these procurement strategies	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
327	ERFN (February 22, 2023)	Section 13.4 Mitigation and Enhancement Measures	Comment #ERFN-230: Mitigation measures are vague and require more clarity. How Indigenous and local hiring will be prioritized and maximized, the likelihood and type of local procurement and training opportunities should be clearly outlined. Question/Recommendation: Develop a robust and clear set of actions to maximize potential benefits to LSA.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

328	ERFN (February 22, 2023)	Section 13.4 Mitigation and Enhancement Measures	Comment #ERFN-231: The workforce transition plan will be a key mitigation measure to protect the LSA communities against any boom- bust effects of the Project. More clarity on this plan, including financial commitments to ensure the long-term economic benefits for the LSA, are needed. This plan should also address transition planning for any local businesses working with the Project. Question/Recommendation: Provide details with financial commitments in the workforce transition plan. This should be developed prior to Project approvals and should be revisited on an ongoing basis.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
329	ERFN (February 22, 2023)	Section 13.5.1 Residual Effects Characterization	Comment #ERFN-232: The residual impacts on employment are said to be positive and low to moderate, without quantifying the impact. At points in the analysis, it is said that there will be little impact on employment and residency due to the fly-in/fly-out nature of the project. Then in this section it is said that the impact on employment could have a moderate effect on the economy. This could cascade to a moderate impact on income disparity, business access to labour, and municipal government cost driven by community growth. Question/Recommendation: Quantify the impacts on employment. Cascade the impacts on employment to impacts on income, business opportunity and government finance.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
330	ERFN (February 22, 2023)	Section 13.5.1.2 Income	Comment #ERFN-233: The residual impact on Income is seen as positive and moderate. This analysis does not consider the impact on income inequality and how that could impact the LSA and RSA. This might change to direction of the impact. Question/Recommendation: Include income disparity as a measurable impact in the analysis and determine if it changes the direction of the impact of the project on Income.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
331	ERFN (February 22, 2023)	Section 13.5.1.3 Traditional Economy	Comment #ERFN-234: The residual impact of the project on the traditional economy is seen as having a magnitude of negligible to low. The characterization of the ability of the workforce to participate in the traditional economy as being minimal or low does not seem to be supported by the evidence presented. Evidence presented indicated that some workers at other similar facilities felt that their ability to participate in the traditional economy had been negatively impacted (13-67). Question/Recommendation Provide additional evidence to support the magnitude of the impact as being negligible to low or adjust the magnitude of the impact. The magnitude of the negative impact could potentially be reduced if Denison proposed additional time off be granted to workers to participate in traditional seasonal harvesting activities.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
332	ERFN (February 22, 2023)	Section 13.5.1.3 Traditional Economy	Comment #ERFN-235: The residual impact of the project on the traditional economy is seen as having a reversibility as fully reversible. The assessment doesn't address the contribution of participating in the traditional economy's impact on social customs and relationships. This effect was identified in the baseline (p. 13-51), but not assessed in section 13.3.2.3. If there is a more than low impact on the traditional economy, this could have a lasting impact on social customs and relationships. This might make return to the traditional economy not as fully reversible as the analysis proposes. Question/Recommendation: Provide additional evidence as to how impacts to the traditional economy won't impact the social customs and relationships, or how if it does these will be able to be reversed after decommissioning.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

333	ERFN (February 22, 2023)	Section 13.5.1.4 Business Opportunities	Comment #ERFN-236 and ERFN-237: The residual impact of the project on business opportunities has a direction of positive. The assessment does not include the impact of the project of existing businesses' access to labour to support ongoing business operations. If the project negatively impacts existing businesses' access to labour the direction of the impact on business opportunity could change. Question/Recommendation: Assess the impact of the project on existing businesses access to labour. Re-assess the direction of the residual impact if necessary.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
334	ERFN (February 22, 2023)	Section 13.5.2. Summary of Project-related Residual Adverse Effects on Economy	Comment #ERFN-238: The effects of the Traditional Economy are likely underestimated. The effects from a GBA+perspective are unknown. The potential boom- bust effects of the Project are not considered. Question/Recommendation: Assess the impact of the project on GBA+.Re-assess the direction of the residual impact if necessary. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
335	ERFN (February 22, 2023)	Section 13.5.2 Summary of Project-related Residual Adverse Effects on Economy	Comment #ERFN-239: The residual adverse effects and economy summary may need to be updated if some of the additional analysis is done. Question/Recommendation: Re-assess the residual adverse effects on the economy after updating the residual effects on the other key indicators. Revise as necessary the Economy Summary.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
336	ERFN (February 22, 2023)	Section 13.7 Monitoring and Follow-up	Comment #ERFN-240: There is very little information on how the economic environment will be monitored. Question/Recommendation: Develop a clear monitoring and follow-up plan with ERFN, addressing each of the Key Indicators and outlining the measurements and reporting that will be undertaken.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
337	ERFN (February 22, 2023)	Section 14.2 Scope, Scale, and Objectives of the Assessment	Comment #ERFN-241: Denison notes that the overall objective of Section 14 Accidents and Malfunctions is to "evaluate the potential effects to human health or the biophysical environment resulting from radiological and conventional accidents and malfunctions in consideration of proposed environmental protection measures" however, continue to state that "some hazards related to work safety were identified; however, worker safety (i.e., risks and consequences) is beyond the scope of this assessment." The lack of full consideration of worker safety with respect to radiological hazards suggests that Denison have failed to identify and consider the full range of accidents, as many of the greatest risks with this project are directly related to worker health and safety, and expand well beyond the health of any one individual (e.g., impacts to worker health and safety may have direct impacts on aquatic or terrestrial conditions, as well as socio-economic perceptions of the mine). Question/Recommendation: Denison must include assessment and consideration of all worker safety risks and consequences associated with accidents and malfunctions for this section to be considered complete. Without this section reviewers are unable assess the broader impacts of the projects and the overall risks to both the environment and society in which this project is set. This request is in alignment with REGDOC-2.9.1 Section A.3.4 which notes that "[t]he applicant should provide an assessment of potential health and environmental effects resulting from postulated radiological and conventional malfunctions or accidents." Our interpretation of this wording is that it applies to both environmental and human health which includes both public and worker health.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

338	ERFN (February 22, 2023)	Section 14.4 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment	Comment #ERFN-242: Examples of Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment outlined in section 14.4 only demonstrate that concerns were raised during engagement activities, however, Denison fails to demonstrate how it included specific Traditional Knowledge both in the assessment of Accidents and Malfunctions, as well as how Traditional Knowledge would be used in monitoring and or response in the event of an accident or malfunction. As a result, ERFN assert that Denison has done a poor job of meaningfully considering the input from ERFN and others. Question/Recommendation: Denison must demonstrate how Traditional Knowledge, not only community concerns, was considered in the assessment of accidents and malfunction including risks, monitoring, and proposed interventions and mitigations.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
339	ERFN (February 22, 2023)	Section 14.4 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment; Table 14.4- 1	Comment #ERFN-243: Table 14.4-1 outlines a summary of engagement records related to accidents and malfunctions; however, Denison does not provide sufficient information regarding the concern which was raised and context in which it was raised. Specifically, in many cases, Denison only present a handful of words as the "comment" and then speaks to assessment consideration, but reviewers are unable to identify the concern which is being raised in most cases. As a result, Denison is able to present a solution for assessment consideration to a concern which is not identified. Question/Recommendation: Denison must provide complete engagement records outlining full comments/concerns with the context in which they were presented in order to demonstrate that these concerns were indeed appropriately considered in relation to the assessment of accidents and malfunctions.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
340	ERFN (February 22, 2023)	Section 14.4 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment; Table 14.4- 1	Comment #ERFN-244: Table 14.4-1 outlines many of the concerns raised through engagement with ERFN and others, however, Denison only point to these concerns being addressed and considered in the Emergency Response Plan and other documents which have not yet been drafted. ERFN find it inappropriate for Denison to continue to defer meaningful discussions about potential impacts and ability to respond beyond the EIS stage. It is necessary to fully understand Denison's mitigation and response for all foreseeable events at this stage in order to evaluate possible residual effects of this project. Question/Recommendation: Denison must provide a draft version of the Emergency Response Plan which outlines all foreseeable effects pathways associated with accident or malfunction, monitoring options to ensure accidents or malfunctions are appropriately detected, and possible consequences and interventions as a result of an accident or malfunction.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
341	ERFN (February 22, 2023)	Section 14.5.1 Overview	Comment #ERFN-245: Denison has identified several risk scenarios as part of the accidents and malfunctions analysis; however, it has not conducted an effects pathway assessment with ERFN directly, allowing Denison and ERFN citizens to communicate concerns associated with the project and potential accidents and malfunctions. As a result, ERFN see that Denison's accidents and malfunctions assessment to be narrow in scope and only speak to western science perspectives. Question/Recommendation: Denison should provide appropriate capacity and support to enable ERFN to engage Denison in establishing an effects pathway assessment to ensure that monitoring, mitigation, and intervention associated with all potential environmental impacts appropriately consider ERFN TK and input, based on how the land is used and the societal impacts of this project.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
342	ERFN (February 22, 2023)	Section 14.5.2 Process Hazards Analysis	Comment #ERFN-246: Denison note that while there are standards and regulatory documents which govern the assessment of risk and probability for an accident or malfunction associated with a reactor facility, similar REGDOCs do not exist for a mining environment. ERFN agree that REGDOCS focusing on risk and probability assessment for a reactor facility is not overly appropriate to a uranium mine facility. However, there remain additional hazards which do not occur at non-nuclear facilities(e.g., non-uranium metal mines), that should be considered. Question/Recommendation: Denison should demonstrate how it utilized lessons learned from other uranium mines in the regional context(e.g., McClean Lake, Cigar Lake, and McArthur River), as well as other ISR facilities in the United States and elsewhere to ground the Hazards Analysis.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

343	ERFN (February 22, 2023)	Section 14.5.2 Process Hazards Analysis; Figure 14.5-2	Comment #ERFN-247: Denison outlines in Figure 14.5-2 a matrix considering likelihood and consequence severity of an accident or malfunction. This approach is used widely in environmental assessment, however, the definitions used to delineate consequence are not appropriately framed through the lens of ERFN land users who live near the facility and use the lands resources which would be affected to exercise rights and traditional practices. As a result, ERFN find the term consequence severity to be superficial. Question/Recommendation: Denison must consider, in its hazard analysis risk matrix, not only the potential impacts to human and environmental health, but also consider by extension the impacts to society, land use, traditional and non-traditional economic factors, and importantly, perceptions in the event of an accident or malfunction. For example, while an accident or malfunction may only have a narrow physical footprint in which the environment is impacted, this incident, especially if associated with a radiological event, could have a much larger perceived area of impact. As a result, the consequence severity may be much greater when viewed through the perspective of ERFN land users rather than what is measurable through western scientific methods.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
344	ERFN (February 22, 2023)	Section 14.5.4 General Design and Mitigation Considerations	Comment #ERFN-248: Section 14.5.4 outlines general design and mitigation considerations for the project. In the preface for this subsection, Denison outline intentions and commitments to "setting high standards for various aspects of its operations, which will serve to mitigate potential Project-related effects." However, only provide a generic overview of measures and features which they are considering. They do not present options and analysis for the consideration of these measures and therefore ERFN are unable to conduct any sort of meaningful assessment of whether they will be effective. Question/Recommendation: Denison must do more to appropriately identify, assess, and proactively propose meaningful options for mitigations to be considered. Specifically, ERFN expects that Denison outline specific hazards, and discussion on measures which will proactively prevent impact and alternative measures to serve as contingency.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
345	ERFN (February 22, 2023)	Section 14.5.4 General Design and Mitigation Considerations	Comment #ERFN-249: Denison note that "the processing plant will be designed with expert consideration of potential environmental and health and safety effects to mitigate interactions to the extent possible." While ERFN do not suspect that this wording implies that other aspects of the project will not be designed with expert consideration of potential environmental and health and safety effects in mind, this statement perfectly exemplifies the frustration ERFN faces in meaningfully evaluating the potential mitigation measures, which are absent. Question/Recommendation: ERFN requests that Denison provide detailed design and activity options based on each identified risk such that the effectiveness and appropriateness of each measure can be adequately assessed.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
346	ERFN (February 22, 2023)	Section 14.5.6 Definition of Bounding Scenarios	Comment #ERFN-250: Denison notes that "the processing plant will be designed with expert consideration of potential environmental and health and safety effects to mitigate interactions to the extent possible." While ERFN do not suspect that this wording implies that other aspects of the project will not be designed with expert consideration of potential environmental and health and safety effects in mind, this statement perfectly exemplifies the frustration ERFN faces in meaningfully evaluating the potential mitigation measures, which are absent. Question/Recommendation: ERFN request that Denison provide detailed design and activity options based on each identified risk such that the effectiveness and appropriateness of each measure can be adequately assessed.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
347	ERFN (February 22, 2023)	Section 14.5.6 Definition of Bounding Scenarios; Table 14.5-2	Comment #ERFN-251: Loss of freeze capacity is identified as High Risk. Based on the risk matrix outlined in Figure 14.5-2 the overall risk is based on both likelihood and consequence severity. It is however unclear the circumstance which led the loss of the freeze capacity to be evaluated as high risk(similarly, failure of the freeze wall is identified as moderate risk, however, again the factors which led to this initial risk characterization are not discussed). ERFN agrees that the consequence severity for loss of freeze capacity and failure of freeze wall to be amongst the greatest for this project, however, what is unclear is whether Denison is suggesting the likelihood is also elevated. Question/Recommendation: ERFN requests that Denison provides an overview of factors which led them to the characterization of risk as presented, including both likelihood, consequence severity, and	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			rational for why those risks were determined to fall within each respective likelihood and consequence severity levels.	
348	ERFN (February 22, 2023)	Section 14.6.1.1.1 Release Characterization	Comment #ERFN-252: ERFN questions the approach used to assess the dissolution rate of uranium on a number of factors. a) Denison uses concentrate samples from the McClean Lake operation as a proxy for yellow cake produced at the Wheeler River project, without providing discussion as to whether these are truly interchangeable for the purposes of assessing solubility. Given the significant differences in processing, it is unclear whether McClean Lake samples are an appropriate proxy. b) The information provided outlining the rate at which uranium will come out solution is not clear. Specifically, ERFN raise concerns that solubility (4,800 ug/L) is used directly to measure the rate of dissolution. Solubility and dissolution rate should have an inversely proportionate relationship. c) Denison make an assumption that only dissolved(soluble) uranium will be mobilized by water. This is not accurate as flowing water can mobilized material which is not dissolved either as bed load or as suspended load, which may travel significantly downstream. d) Denison indicates that "that most (98% of the mass) of the uranium concentrate is expected to settle within a short distance of the release (i.e., within approximately 20 m of the release point), even under high flow conditions in the Wheeler River due to a relatively slow water velocity (<0.8 m/s)." This is a very narrow range of expected impacts; however, insufficient information has been made available to understand the spatial modelling that has been conducted to support this assertion Question/Recommendation: Denison must provide additional information regarding the methods used to model possible uranium flow, including providing a particle dispersion map of the downstream environment to illustrate expected movement and areas which could be effected in the event of an accident and spill.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
349	ERFN (February 22, 2023)	Section 14.6.1.3 Evaluation of Probability	Comment #ERFN-253: Generalized national or provincial transportation accident statistics is not an appropriate proxy given the unique conditions which face transportation of material from the Wheeler River site. Specifically, generalize statistics do not consider the increased risks of driving on a remote roadway, that is poorly lit and has frequent encounters with wildlife. Question/Recommendation: Denison must consider the additive or interactive effects of the road conditions unique to the Wheeler River project, which may increase accident rates beyond that of conventional roadway accident statistics.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
350	ERFN (February 22, 2023)	Section 14.6.1.4.2 Exposure Assessment	Comment #ERFN-254: The assessment of risk associated with a vehicular accident in which uranium is spilled into Wheeler River does not consider either the psychological/ perceived impacts of the spill, in which ERFN citizens may be less likely to want to interact with the river following an accident regardless of whether the spill was appropriately cleaned up, or the impacts to fish and aquatic habitat as a result of cleanup efforts. Given the need to clean the physical substrate significant amounts of fish habitat would be destroyed in order to effectively remediate a spill site. Question/Recommendation: Denison must consider the secondary implications of mitigation measures and interventions in the event there is an accident resulting in a spill.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

351	ERFN (February 22, 2023)	Section 14.6.3.1 Scenario Description	Comment #ERFN-255: Denison note that the freeze wall will require a minimum of 12 months to thaw in the event of freezing system failure. It is unclear where this value originated from and the factors which contribute to such a slow thawing cycle. Question/Recommendation: ERFN requests that Denison provide modelling data for the thawing rates of freeze wall based on the geological properties to be encountered by the freeze wall.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
352	ERFN (February 22, 2023)	Section 14.6.3.3 Evaluation of Probability	Comment #ERFN-256: Denison notes that a probability value of 1 x10-7 was established for the likelihood of loss of freeze capacity based on professional judgement. ERFN contests this value as entirely speculative and offered without substance. There are a wide range of factors that may contribute to short and long-term reductions or losses in freeze capacity (e.g., power failure, equipment failure, maintenance), which are not discussed. Question/Recommendation: Denison must provide a more meaningful assessment of specific factors which could lead to the loss or reduction of freeze capacity, demonstrating how they may contribute to an overall likelihood of loss of freeze capacity.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
353	ERFN (February 22, 2023)	Section 14.6.3.4 Evaluation of Consequences	Comment #ERFN-257: Denison argues in sections 14.6.3.1, 14.6.3.3 and14.6.3.4 without substance that the risk of groundwater contamination due to the loss of freeze capacity is very unlikely. The lack of evidence presented to substantial these claims is alarming to ERFN. ERFN agree that under normal circumstances the likelihood of the freeze wall failing allowing for groundwater contamination is on the lower end of the likelihood spectrum, however, ERFN are not currently assessing effectiveness under normal circumstances, but rather as a result of accident or malfunction. Based on the discussion provided in section 14.6.3.4, there is great concern to ERFN that Denison would be a) able to detect the failure of a freeze wall and b) identify the exposure pathway to enable Denison to take appropriate action before catastrophic environmental impacts are observed. Question/Recommendation: ERFN is gravely concerned about the information put forward by Denison in section 14.6.3 regarding the risk assessment associated with likelihood and consequences of failure by the freeze wall. Denison has not presented a viable method to monitor the effectiveness of the freeze wall. Additionally, Denison indicates that there are no viable methods of detecting impacts or intervening until they are observed, indicating failure of the freeze wall. Finally, when speaking to the likelihood of an accident or malfunction, Denison only offer a best guess. ERFN requests that CSNC and Denison take seriously the possible threat to the environment and by extension ERFN Rights and interests associated with the failure of the freeze wall. ERFN cannot overstate the need to provide additional analysis of contingency measures to avoid containment in the event the freeze wall fails to contain mining fluids and other sources of groundwater contamination associated with Wheeler River activities. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
354	ERFN (February 22, 2023)	Section 14.6.4.1 Scenario Description	Comment #ERFN-258: Denison suggests that the "low temperature of the formation in and around the compromised section of the freeze wall would most likely cause the fluids to freeze and seal or partially seal the opening, further reducing the rate of contamination." It is unclear how mining fluids may influence the freezing point of groundwater, and therefore allow mining fluids to either thaw the freeze wall or be immune to subsequent freezing by surrounding materials. Question/Recommendation: ERFN request Denison provide a breakdown of expected freezing points for mining fluids or other liquids within the mining theatre which may interact with the freeze wall.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

355	ERFN (February 22, 2023)	Section 14.6.4.1 Scenario Description	Comment #ERFN-259: Denison speculates that migration of fluids from the mining theatre beyond a compromised freeze wall section would be slow due to low temperatures. a) This assertion is not supported by ground water modelling or other evidence accounting for groundwater flow, especially as liquids are being injected and extracted via ISR mine operations. b) If migration is indeed slow, it would imply that the detection of impacts would also be slow. This may mean that impacts from a compromised freeze wall may not be observed until after the mine has completed its production life. ERFN is therefore concerned that the inability to detect impacts may result in a legacy of contamination which may not be the responsibility of Denison if they are not detected until after the mine has completed closure and reclamation activities. Question/Recommendation: (i) Denison should provide detailed scenario based modelling to demonstrate expected flow rather beyond a compromised freeze wall. (ii) Denison should include an appropriate groundwater monitoring program surrounding the project to run throughout the entire lifecycle of the mine to best capture potential contamination and migration of mining fluids.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
356	ERFN (February 22, 2023)	Section 14.6.5.2 Design and Mitigation Considerations	Comment #ERFN-260: Radon is an odorless, colourless gas. While a burst pipe of vessel under pressure may result in obvious signs of a leak, leaky valves and or fittings may allow for radon to escape undetected. Question/Recommendation: Denison should identify measures to ensure that valves and fittings are inspected and maintained in routine intervals. Also, ERFN recommend that radon detectors be installed and monitored near all enclosed infrastructure where radon gas may escape.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
357	ERFN (February 22, 2023)	Section 14.6.6.1.1 Release Characterization	Comment #ERFN-261: Denison assumes that in the event of an explosion 90% of the uranium would be trapped within the damaged dryer unit, however, fail to substantiate this assumption. Question/Recommendation: Denison should base assumptions on maximum risk scenarios rather than minimum or probable risk scenarios. As a result, ERFN request that the LPF be equated to 1 rather than 0.1.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
358	ERFN (February 22, 2023)	Section 14.6.6.2 Design and Mitigation Considerations	Comment #ERFN-262: In speaking to design and mitigation considerations Denison only make hypothetical or aspirational commitments (e.g. "Denison would make sure that the design of the plant includes control measures to reduce exposure levels to workers and members of the public to levels that are as low as achievable."). These are not specific design considerations or hard commitments. Question/Recommendation: Denison should commit to best practices, including the implementation of specific measures rather than simply stating plans to commit the implementation of design and mitigation considerations.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
359	ERFN (February 22, 2023)	Section 14.8 Key Findings and Conclusions	Comment #ERFN-263: Denison has presented an accidents and malfunctions assessment that speaks only to a handful of concerns, while presenting in many cases minimal evidence to substantiate its assertions and assumptions. ERFN is very concerned by the lack of consideration for contingency planning associated with the identified risks. Question/Recommendation: ERFN does not consider section 14 sufficiently comprehensive or meaningful for the purposes of assessing risks.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

360	ERFN (February 22, 2023)	Section 15.2.1. Existing Environmental Conditions	Comment #ERFN-264: ERFN agree that the probability of a significant seismic event effecting the project site is low, however, it is not zero. Further, given the inherent design of the project, which relies on the establishment of multiple closely spaced deep wells to be drilled for injection and extraction, well design must be such that it can withstand significant sheer forces associated with horizontal movement. Denison presents an inconclusive outline of design considerations to be incorporated to minimize risks to well structures, and the freeze wall as a result of a significant seismic event. Question/Recommendation: ERFN request Denison provide an analysis looking at other similar projects to identify specific design considerations to mitigate risks to below-ground infrastructure as a result of seismic activity.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
361	ERFN (February 22, 2023)	Section 15.2.1. Existing Environmental Conditions	Comment #ERFN-265: Human induced seismic activity has been observed in association with the use of injection wells. This have been most notably observed in association with hydraulic fracturing in the extraction of shale gas, where high- pressure fluid liquid is forced into geological formations with the intention of fracturing the rock to release trapped gasses. However, similar human induced seismic activity has been observed in other instances where injection wells are used, resulting in large changes of water or gas form underground reservoirs, creation of voids space, changes in pore-pressure, all have been associated with increases in seismic activity (Ellsworth, 2013). ERFN is concerned that similar human induced seismic activity may increase as a result of the extraction process being proposed by Denison. Question/Recommendation: ERFN request that Denison provide evidence using examples of other in situ recovery uranium mines around the world to discuss the potential risks of increased seismic activity as a result of the proposed activity.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
362	ERFN (February 22, 2023)	Section 15.2.2. Effects on the Project	Comment #ERFN-266: Although seismic activity is unlikely, it is still possible. Given the inherent hazards associated with this project there is a need to ensure that project infrastructure can withstand all likely seismic events. Question/Recommendation: ERFN request that Denison provide information on the magnitude and duration of a seismic event for which infrastructure will be designed to withstand. Included should be an analysis of the likelihood of such and event to occur at the project site.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
363	ERFN (February 22, 2023)	Section 15.3.2 Effects on the Project	Comment #ERFN-267: Denison notes that although potential exists for forest fires to occur during the life of the Project, fire is not expected to have a detrimental effect on the Project given the design features and mitigation measures that Denison with have in place with the Fire Protection Program, which will be developed specifically for the Project and based on proven programs at existing northern sites. Denison does not provide additional information on what mitigations will be included in the Fire Protection Program, nor does it provide information on which existing programs they will be based on. Forest fires present perhaps one of the greatest environmental threats to the safe operation of this project, as fires are frequent in the region, inherently difficult to control, and likely to increase as a result of climate change. Question/Recommendation: (i) ERFN request that Denison provide additional information on fire mitigation and suppression measures that are to be established and maintained to minimize the risk of fire to the project. Specifically, more information is needed to describe how infrastructure used in the extraction, handling, processing, and storage of uranium ore and products will be safeguarded against fire (such as the use of fire proof building materials). (ii) Additional information is requested on the existing northern sites used to inform the development of the Fire Protection Program. (iii) Denison does not contemplate risks or consequences of an uncontrolled fire affecting the project site. ERFN request that additional information be provided modelling atmospheric dispersal potential of radioactive material from stockpiles and facilities in the event fire were to impact the project footprint.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

364	ERFN (February 22, 2023)	Section 15.3.2 Effects on the Project	Comment #ERFN-268: Denison notes that the potential for increased forest fire frequency and severity due to climate change in the coming decade, referencing Section 15.3.2. However, no additional information about the potential interplay between forest fires and climate change is discussed in this section beyond this sentence. Question/Recommendation: ERFN requests that Denison revise this section to either accurately cite the appropriate section reference or provide additional discussion on the potential impacts of increase forest fire frequency and severity on the project as a result of climate change.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
365	ERFN (February 22, 2023)	Section 15.4.2 Effects on the Project Table 15.4- 1	Comment #ERFN-269: Denison notes that in response to major precipitation events, suitable equipment and design systems will be selected for the project to operate under heavy precipitation conditions, however, do not specific what design standard will be selected. Question/Recommendation: Given that climate change has the potential to increase the frequency and severity of heavy precipitation events, ERFN request that Denison specify a design standard which outlines the return period for an event (e.g., 1 in 100, 1 in 500 event).	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
366	ERFN (February 22, 2023)	Section 15.4.2 Effects on the Project Table 15.4- 1	Comment #ERFN-270: Non-contact surface runoff may include water which contains elevated amounts of suspended solids or other water quality constituents which are greater than allowable for discharge to the environment as a result of contact with roadway surfaces, or modified landcover. The likelihood of poor water quality is greater in surface runoff during extreme and prolonged precipitation or melt events. Question/Recommendation: Please provide an outline of how Denison plans to monitor and appropriately intervene in instances where non-contact surface water runoff does not meet appropriate water quality standards as a result of an extreme or prolonged precipitation or melt event.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
367	ERFN (February 22, 2023)	Section 15.4.2 Effects on the Project Table 15.4- 1	Comment #ERFN-271: While it is logical for the water management infrastructure to be designed to allow for water to be transferred from pond to pond as required, during a significant or prolonged precipitation or melt event, water storage ponds are likely to all rise proportionately, making this mitigation potentially fruitless. Question/Recommendation: Please identify design considerations including maximum storage capacity, operational freeboard, spillway location and design, and excess treatment capacity which may allow for additional treated effluent discharge to environment in the event total pond capacity is exceeded.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
368	ERFN (February 22, 2023)	Section 15.4.2 Effects on the Project Table 15.4- 1	Comment #ERFN-272: Denison notes that the system as proposed is designed to recycle a significant amount of the process water encountered, minimizing the amount of water that is needed to be withdrawn from Whitefish Lake. However, it is unclear from the description provided whether or not operational plan to be developed include considerations for minimum or maximum water levels within the storage ponds. Question/Recommendation: Please outline whether water storage ponds require a minimum amount of water to maintain operations of mine processes and function of the ponds themselves.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
369	ERFN (February 22, 2023)	Section 15.4.2 Effects on the Project Table 15.4- 1	Comment #ERFN-273: Water takings and recycle may be effected during periods of extended drought. Increased water taking from Whitefish Lake may impact the water level in the lake, fish habitat, and use. Question/Recommendation: Please outline total water balance including maximum expected water takings from Whitefish Lake.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

370	ERFN (February 22, 2023)	Section 15.4.2 Effects on the Project Table 15.4- 1	Comment #ERFN-274: The use of additional energy generation on site as a result of air conditioning will increase the carbon footprint of the project. Question/Recommendation: (i) Please provide analysis of how increased air temperatures will alter the overall carbon emissions to be produced by this project. (ii) In the event that diesel generators are required as a result of a power outage, please provide a synopsis of how operations may be impacted, including a reduction in operations to minimize carbon emissions associated with running generators. (iii) It is recommended that during summer months, alternative energy options are utilized rather than diesel generators to provide backup power. This will minimize the carbon and nitrogen dioxide footprint. Please provide information on how the use of emergency diesel backup generators has been included into the predicted nitrogen dioxide and carbon emissions/air quality assessment.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
371	ERFN (February 22, 2023)	Section 15.4.2 Effects on the Project Table 15.4- 1	Comment #ERFN-275: Denison do not provide a discussion on the potential impacts of wind erosion on stockpiles or other dry- stacked materials during an extremely high wind event. Question/Recommendation: (i) ERFN recommend that PM15, metals, and radioactive material be modelled under extreme wind conditions, demonstrating potential dispersal, and associated implications. (ii) ERFN request that Denison develop appropriate mitigation plans for minimizing dust from roadways, stockpiles, and dry-stacked materials as a result of extremely high winds - including those associated with tornadic events.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
372	ERFN (February 22, 2023)	Section 15.5 Climate Change	Comment #ERFN-276: Denison notes that concerns related to climate change were raised during engagement and consultation activities, however, these concerns pertain to climate change rather than GHG emissions specifically. While this may be technically accurate, climate change and the release of GHG emissions should be considered as synonymous as the cause-and-effect relationship is well established. Denison will be responsible for the emission of significant amounts of GHG, which although are difficult to quantify in their impact on the local and regional environment, contribute to climate change which is experienced at local, regional, and global levels. Question/Recommendation: Denison must recognize the inherent connectedness between its operation and climate change. Further, it is necessary that Denison implement meaningful and realistic approaches to minimizing its GHG emissions and contributions to climate change.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
373	ERFN (February 22, 2023)	EIS Section 15.5.3 Effects on the Project	Comment #ERFN-277: Throughout much of the assessment on the effects of the environment on the project, Denison downplays the potential uncertainty due to natural events. This includes providing minimal discussion on the potential for flooding, excess snowfall, and tornadic events, as well as insufficient discussion on planned mitigation options for addressing effects of the environment identified. Question/Recommendation: (i) Denison should provide analysis of potential effects of the environment on the project as a result of surface water flooding, excess snowfall events, and tornados on the project. (ii) Denison should provide additional information linking mitigation measures to possible effects of the environment, including specific design standards to demonstrate the project will be designed to minimize risks.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.
374	ERFN (February 22, 2023)	Section 15 General	Comment #ERFN-278: The Wheeler River project is located in an area of discontinuous permafrost. This aspect is not identified or examined with respect to the potential impacts of the environment on this project. (i) ERFN see this as a potential significant oversight as works conducted and infrastructure constructed on discontinuous permafrost may be impacted by permafrost melt. As frost heave and slumping may adversely impact the project site. (ii) Permafrost has an ability to trap methane and other GHGs from escaping into the environment. Permafrost which is melted or disturbed may release those gases. If permafrost will be disrupted by project activities, Denison must consider GHGs to be released as part of its impacts on the environment Question/Recommendation: (i) Denison must provide discussion on the presence or absence of discontinuous permafrost in RSA, and whether that permafrost will be impacted by project activities.	As part of an agreed-upon process between ERFN and Denison Mines, ERFN further directed Denison to provide responses to 15 Main Areas of Concern identified by ERFN, which summarized comment numbers 104 to 374 (see Main Areas of Concern for ERFN #1-15 incorporated into this table) in the CNSC Consolidated Comments from Indigenous Nations and Communities and the Public on the Wheeler River Project Draft Environmental Impact Statement.

			(ii) Where permafrost may be impacted, Denison must quantify the amount of GHG that will be released from melting or disturbed permafrost areas.	
375	Ya'thi Nene Land and Resource Office (YNLRO) (March 4, 2023)	EIS Executive Summary, p. 2	**YNLR Comment March 4, 2023** Comments #1, 2 and 3, Appendix A: YNLR sees a potential benefit of the in-situ approach as it is designed to reduce the surface disturbance of the Project, and the potential leakage of contaminants from excavated rock and tailings. However: - YNLR is concerned that the extraction of source water for the Project may have a negative effect on stream flows both below- and aboveground. - YNLR is concerned with the potential effects of contaminants released during and after the Project. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison acknowledges these concerns and notes the comment from YNLR references the Executive Summary. Both of the areas of interest raised by the comment are addressed in the main part of the draft EIS and supporting appendices. Denison refers YNLR to the following sections for comprehensive evaluation of these aspects of the Project: • Potential changes in surface water quantity as the result of the Project, including consideration of water taking activities, are presented in the hydrology assessment (draft EIS, Section 8.1). • Potential changes to groundwater quantity and quality as the result of the Project, including consideration of the long-term implications of the mining method, are presented in the groundwater assessment (draft EIS, Section 7). Specifically, the 'future centuries' temporal scope of the assessment for Groundwater considers the period for which the highest COPC concentrations in groundwater are predicted to interact with surface water based on groundwater modeling described in Appendix 7-C. Due to the relatively long travel time (relatively low groundwater velocities) between the mining area (Section 7.6.2.2.3) and the surface water environment where groundwater/surface water interactions are expected, as well as the potential for chemical reactions along the groundwater flow pathway, a 'future centuries' scenario was deemed appropriate to fully assess potential future effects beyond the Project timeline (i.e., 0 to 38 years). The 'future centuries' temporal scope was also developed in recognition of the concerns raised by Interested Parties through the engagement process around the potential for the Project to influence water quality into the future. These assessments, completed in a transparent and rigorous manner, concluded that residual effects of the Project would not be significant. Follow-up and monitoring programs will be employed to confirm mitigation measures are functioning as planned and to confirm EA predictions. For example. a groundwater monitoring plan, including an excursion contingency plan and measures for adaptive management will be implemented for the Project. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 375. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

376	YNLRO (March 4, 2023)	EIS Executive Summary, p. 2	**YNLR Comment March 4, 2023** Comment #4, Appendix A: based on the information from p. 2 of the Project Overview: YNLR assumes no permanent work camp will be constructed. YNLR expects that a sizeable proportion of the Project workers will be hired from the local and regional area. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan, inclusive of YNLR) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. YNLR businesses would fall in the category of northern Saskatchewan businesses, which would place them in line for second preference if project needs cannot be met within the local study area. Details on the Project components are provided in EIS Section 2. The Project will be operated as a fly-in/fly-out mine, meaning the opportunities for interactions between the workforce and Indigenous communities are limited as workers will be transported by air directly to the site. The proposed camp or accommodations facility is anticipated to be a turnkey building manufactured off site and assembled and commissioned on site. The building's design will be sized to accommodate a peak load of about 190 individuals during Operation; however, due to its modularized design, additional modules can be easily installed should additional beds be required in the future. Section 13 provides the assessment for the key indicator of employment and training, which is a component of the Economy Valued Component. A summary of residual environmental effects on employment and training is found in Table 13.5-2. Employment opportunities represent direct and indirect benefits associated with construction and operation of projects, particularly in the vicinity of communities where unemployment is typically high. Additionally, because the property is located on Crown Land, a mineral surface lease agreement will be negotiated with the Province, specifically the Ministries of Environment and Government Relations. The agreement grants surface rights for the purpose of accessing the land to extract minerals under the Crown Resources Land Regulations. The mineral surface lease agreement provides long term rental of Crown land for mining and milling in Saskatchewan. The agreement also contain specific commitments for environmental protections for the life of the project, OH&S protocols, reporting requirements, and socio-economic benefits for residents of northern Saskatchewan. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 376. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

377	YNLRO (March 4, 2023)	EIS Executive Summary, p. 2	**YNLR Comment March 4, 2023** Comment #5, Appendix A: YNLR is concerned with the potential increase in road and off- road traffic affecting wildlife and fisheries sustainability. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles and will largely be "confined" to the camp and work areas during their shifts. Refer to draft EIS, Section 12 Quality of Life for the assessment of potential Project effects on the Key Indicator of Infrastructure and services (traffic) and the associated measurable parameter of change in traffic volumes and types and risk of accident. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 377. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
378	YNLRO (March 4, 2023)	EIS Executive Summary, p. 2	**YNLR Comment March 4, 2023** Comment #6, Appendix A: YNLR supports this built-in precautionary approach to the Project's risk assessment. However, given the lengthy timeline of the Project, YNLR would like to see that lost (i.e., unmitigated) wildlife and fisheries habitat be offset in some manner. A response to this should be approached through an anticipated impact benefit agreement. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. No other specific needs for "offset" have been identified based on the effects assessment. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 378. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's

				concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
379	YNLRO (March 4, 2023)	EIS Executive Summary, p. 2	**YNLR Comment March 4, 2023** The EIS Executive Summary outlines mitigation measures, monitoring requirements, and commitments needed for Denison to have confidence that Project is operating as planned and that the actual effects resulting from Project Construction, Operation, and Decommissioning are at or below predicted effects. Comment #7, Appendix A: Despite these reassuring statements, YNLR is aware that predictions may fall short, hence the need for close collaboration with Indigenous Peoples, communities, and organizations, including their input into the design and implementation of transparent and statistically-robust project monitoring programs. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** Denison states that they will inform YNLR of the development of their monitoring plan. This does not meet the YNLR request for input and collaboration into the design of monitoring programs. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison acknowledges the comment and is committed to ongoing engagement and dialogue with interested parties with respect to monitoring. Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs

				provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
380	YNLRO (March 4, 2023)	EIS Executive Summary, p. 2, 12, 44, 45 and 47	**YNLR Comment March 4, 2023** Comments #8, 10, 21 and 22, Appendix A: YNLR remains concerned about the nature and disposition of project contaminants during and after the mining process. - YNLR supports the Project outcome of lower aboveground disturbance, it retains concerns about the management inputs and outputs of the ISR method, particularly project water sources, quantity, and release along with its associated contaminants. - The release of contaminants before and after the Project's completion worries YNLR, which sets a high priority on clean and abundant groundwater and surface water. The Indigenous People, communities, and organizations YNLR represents will be here long after mine decommissioning, so minimizing this risk with statements regarding the length of time it takes is not helpful. - As with groundwater, YNLR places a high value on the quantity and quality of surface waters. Monitoring of water will be critical, and YNLR expects to be consulted and heavily involved with respect to this activity. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No timeline for consultation has been offered. The response simply restates Denison's original comments in the EIS. Denison promises dialogue. YNLR wants to see the predecommisioning monitoring plan for contaminant releases so that mitigation can be applied long before decommissioning. YNLR wants to be involved with all monitoring plans and programs from conception to implementation. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development. YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed. YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR's interest in the details of Denison's caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR's GIS based Method for Assessing Cumulative Environmental Effects). Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison acknowledges the comment and concerns raised by YNLR. Denison believes the assessment of potential effects, such as those highlighted in the review comment, have been considered in a robust manner in the EIS and appropriate mitigations have been proposed. Denison is committed to ongoing engagement and dialogue with interested parties on key Project aspects such as that referenced in the review comment. With specific reference to site decommissioning the following is noted. Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. YNLR has shared comments with respect to Woodland Caribou offsets, including those related to the definition of offsets, timing, and mitigation measures as part of present-day mitigation measures for the Project, and should be applied in advance of decommissioning. YNLR has also requested to see the predecommissioning monitoring plan for containment releases. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided a document titled Summary of Monitoring, which outlines the Project's commitments for monitoring programs for all phases of the Project from preconstruction to post decommissioning. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development."

			plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.	Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project's detailed decommissioning plan. Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison's previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.
381	YNLRO (March 4, 2023)	EIS Executive Summary Freeze Wall, p. 12 and 13	**YNLR Comment March 4, 2023** Comments #11, 12 and 13, Appendix A: Containment of the mining solution and uranium bearing solution within the mining area will be achieved through a defence-in-depth approach with three levels of containment. - YNLR assumes that information and data exist with respect to the environmental safety of freeze wall technology in uranium mining operations within Saskatchewan. Has Denison reviewed these data and are they considered/presented as part of this EIS? If not, why not? - What happens to the freeze wall and its retained contaminants at the end of the Project's life? – despite safeguards and remediation, it has potential to release contaminants after mining is completed. - Monitoring and adaptive management are important components of sustainable uranium mining. YNLR expects to be consulted/included in the design and implementation of the Project's environmental monitoring programs. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** This statement is misleading because ground freezing to contain contaminants in a uranium mining extraction project has never been done in Canada before. Independent assessment comments are needed here. It is unclear that groundwater contaminates monitoring outside of the freeze wall is unnecessary to monitor this risk of leakage and confirm the conclusions of the predictive modeling. It is good that Denison later alludes that monitoring is necessary; however, prior comments as to the extent of YNLR involvement in planning and execution of monitoring is reiterated. It is noted that Denison has committed to ground water monitoring; however, prior comments as to the extent of YNLR involvement in planning and execution of monitoring is reiterated. TK will have no input into ground water contamination until health risks are noted decades or	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison notes this comment is on the Executive Summary and that more detailed information is available in the main part of the draft EIS e.g., Section 2 Project Description and Section 7 Geology and Groundwater (and associated appendices). Ground freezing technology is well established and used widely throughout the world. Its use in a mining environment was pioneered in Saskatchewan's potash mining industry for shaft sinking activities, and later adapted for use in Saskatchewan's uranium industry. Ground freezing to control and eliminate groundwater from entering mining areas is a fundamental component of two existing Athabasca Basin underground uranium mines: Cameco Corporation's McArthur River Operation and Cigar Lake Operation. Freeze walls, when fully developed, are capable of withstanding significant external pressures because the ice in the pore voids greatly improves the bulk strength of the soil. For example, in the province of Saskatchewan, ground freezing is used to support the sinking of deep potash mine shafts, which must penetrate through the Mannville formation at a depth between 400 and 500 m below surface. The Mannville formation is often described as saturated, unconsolidated beach sand and it would not support shaft excavation in a thawed state. Freezing is used to create a structural and impermeable wall up to 5 m thick, which can resist a stress gradient driven by full hydrostatic and/or lithostatic pressures on the outside of the wall, and an open to atmosphere excavation within the shaft. This loading condition is much more extreme than any condition the freeze walls at the Phoenix deposit will experience because the interior side of the freeze wall where active ISR mining is occurring is not open to atmosphere and is fluid filled in the same way that the regional groundwater system is on the exterior side of the freeze wall, creating a balanced pressure system, where loading is equal on both the interior and exterior sides.. While freeze walls are very strong when fully developed, they are also plastic in nature. This means that they can slowly deform without failing in response to localized ground deformations. As the freeze wall deforms towards a lower stress zone, it maintains its thickness and integrity. While the above example

			centuries later. Therefore, the relevance of this statement from Denison saying that TK will inform the ground water monitoring plan is questionable. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development. YNLR appreciates the offer of Denison's Technical expert to brief YNLR on their concerns with freeze-wall technology. Unfortunately, Denison's freeze-wall technical expert is no more independent that Denison's Cumulative Effects technical expert, that YNLR staff spoke to on 22 Feb 2024. Hence, YNLR's concerns as stated in their response remains. Going forward on this item, YNLR will engage with CNSC for access to an independent technical expert on freeze-wall technology. Denison's above statement is a reassertion of their comment addressed by YNLR in their letters of 02 February 2024 and 13 March 2024. Therefore, YNLR's concerns as to their involvement in monitoring, remain valid and unaddressed.	referred to potash shafts, other examples can be drawn from the experience at the McArthur River or Cigar Lake uranium mines. At McArthur River, open stopes are generated directly adjacent to a freeze wall that is a nominal 4 m thick. At Cigar Lake, open mine cavities 10 m high and several metres in diameter commonly exist within the frozen ground. Neither site has had a breach of the freeze wall during mining activity. Given that the freeze wall at Denison will be much thicker than at McArthur River and that it will be located up to 25 m from the ore zone, it is not anticipated that it will be exposed to a stress environment that will put it at risk. Since the mine design includes the freeze wall as a tertiary management strategy, movement of mining solution is restricted and contained horizontally during operations. Wellfield pumping is the primary form of containment and provides the hydraulic containment to keep mining solution within the 50 m mining area (see Section 2.2.1.4.2). During the operation phase, and under normal operational conditions there is no interaction between the mining zone and surface water or down gradient groundwater environments, and the groundwater assessment (Section 7) focuses on the post-decommissioning period following removal of the freeze wall, once the groundwater flow paths return to pre-mining conditions. During mining area remediation (see Section 2.3.3.1.1), the freeze wall will remain in place until decommissioning objectives are achieved. Refinement of the mining area decommissioning objectives and associated modelling will be done through updates to the Decommissioning Plan, and will be bounded by the objectives evaluated in the EIS. To carefully evaluate how constituents dissolved in the remediated groundwater within the mining area may migrate away from and interact with the environment, a rigorous numerical model of groundwater flow and chemical constituent behaviour along the groundwater flow path was used as a predictive tool. The model is based on proven scientific principles and processes (e.g., groundwater flow, contaminant transport, and geochemical reaction processes) and allowed future conditions to be evaluated. Migration of dissolved constituent concentrations along the groundwater flow path from the mining area to Whitefish Lake (the local surface water receptor) is predicted to take hundreds to thousands of years, with concentrations remaining below values that would result in an environmental risk. Given the nature of the ISR mining method that will be employed by the Project groundwater monitoring is an important consideration. The groundwater monitoring plan would be developed in consideration of how Project facilities and activities could interact with the groundwater environment and groundwater users to define monitoring needs (locations, frequencies and constituents). Data generated from the groundwater monitoring plan would serve various purposes, such as to assess performance and the controls associated with the ISR process, demonstrate compliance with internal action levels, assess performance of emissions control systems, and contribute to the understanding of the potential influence of the Project on the groundwater environment. The groundwater monitoring program would demonstrate, during each Project phase, that: • excursions are not occurring; if excursions do occur, an early warning/timely signal will be provided of when and where they are occurring such that appropriate further evaluation and actions can be undertaken; • commitments made in the EA are being achieved; and • protection of groundwater end use/receiving environment is being achieved. The groundwater monitoring plan would be informed by existing local and traditional knowledge, ongoing engagement activities with interested parties, information generated by development of EIS and its supporting documents, relevant guidance, such as CSA Standard N288.7-15, Groundwater Protection Programs at Class I Nuclear Facilities and Uranium Mine and Mills as well as any applicable licenses, approvals, and permits. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison would be pleased to coordinate a meeting between YNLR and the technical expert Denison utilized, Greg Newman from Newman's Geotechnique, to design the freeze wall and confirm its effectiveness for the geological and hydrogeological conditions for an ISR mine at Wheeler River. A meeting could be the most effective means for YNLR to seek information about the areas of concern with respect to the freezing technology. Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted that detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and

				procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. Denison would like to clarify that the current rigorous groundwater modelling does not indicate there will be groundwater contamination nor health risks from the Project. The groundwater monitoring program will be robust and meet all regulatory standards for the type of mining proposed for the Project. Further, Denison would like to note that consideration of local and Traditional Knowledge in all facets of the Wheeler River Project will be guided by local and Traditional Knowledge Holders to the extent they wish to share information. As an example, Traditional Knowledge may or may not be relevant to groundwater monitoring results, but may have relevance to the considerations in the planning for such monitoring. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison respects the YNLR's desire to seek other expertise. In any event, should the YNLR wish to meet with the qualified professional utilized to design the freeze wall, Denison would be happy to facilitate. Denison has offered to involve the YNLR in groundwater monitoring plans and notes that the timeline and detail for the development of these plans extends beyond the environmental assessment process. Denison remains open to the YNLR's involvement in groundwater monitoring plans now and in the future. Further, Denison reiterates that it will continue to consider local and Traditional Knowledge in all facets of the Project to the extent holders of such knowledge wish to share information with us.

382	YNLRO (March 4, 2023)	EIS Executive Summary, p.16	**YNLR Comment March 4, 2023** Comment #14, Appendix A: Will the released radon gas be of any concern to natural resources, such as fish and wildlife? **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Inhalation pathway to terrestrial wildlife and birds was included in the Ecological Risk Assessment (EcoRA). Please refer to the draft EIS Appendix 10-A Section 5 and an excerpt is provided below for reference: Exposure pathways consider the various routes by which radionuclides and/or chemicals may enter the body of the receptor, or for radionuclides, may exert effects from outside the body. Exposures to environmental media may be direct (i.e., by contact) or indirect (i.e., via constituent transport through the food chain). For each type of ecological receptor, draft EIS Appendix 10-A Table 5-5 summarizes the relevant exposure pathways to various environmental media including air, surface water, soil, and sediment. Airborne COPCs partition to soil and plants. For most COPCs, ingestion pathways dominate over inhalation and air immersion. The latter pathways are considered minor pathways in the EcoRA, but inhalation was included in the IMPACT model and is thus included in draft EIS Appendix 10-A Table 5-5. Exposure to constituents that may deposit from air to surface water was not considered, as that pathway is considered negligible according to CSA N288.1-20. As such, a pathway of radon in air to aquatic receptors such as fish was not evaluated. Radiological dose to aquatic receptors is evaluated through water and sediment exposure, as appropriate based on the receptor's characteristics. For fish, aquatic plants, and aquatic invertebrates, contact with water and constituent uptake from water via bioaccumulation represents the main exposure pathway. Direct contact or uptake from sediment are also considered for benthic invertebrates and bottom-feeding fish. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 382. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
383	YNLRO (March 4, 2023)	EIS Executive Summary, p.18 Land and Resource Use, p. 11- 50 to 11-52	**YNLR Comment March 4, 2023** Comment #15, Appendix A: While Project water reuse is laudable, its overall conservation and management are significant concerns for YNLR, particularly the quantities removed from the ecosystem and the fate of contaminated water released back into the ecosystem from the Project that end up in Wollaston Lake. YNLR expects to be consulted/included in the design and implementation of the Project's environmental monitoring programs. Comment #85, Appendix A: YNLR remains concerned with the potential effects of Project contamination on culturally important natural resources. These concerns stem from the nature of the materials being mined, and the novel method (ISR) by which they are being extracted. Northern residents and Indigenous Peoples will be living here long after the mine is exhausted, thus effective monitoring is critical, as is the inclusion of impacted Aboriginal and Treaty rights holders in the design and implementation of arm's length, transparent, and statistically-robust monitoring programs. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** The monitoring plans are not yet drafted and therefore this is an unacceptable. response. The request is reiterated for Denison to support a collaborative approach at the concept and methodology development stage. "Monitoring plans when drafted" makes this an unacceptable response to the YNLR concern, this does not go beyond the statement in the EIS and therefore the further response here continues to be unacceptable; prior comments as to the extent of YNLR involvement in planning and execution of monitoring is reiterated.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** The specific activity of water withdrawal from Whitefish Lake was assessed in the draft EIS, Section 8.1. The conservative estimate of water withdrawal would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm; this minor change is beyond the ability of monitoring techniques to practically measure, and the assessment concluded that the Project would not result in a significant effect on surface water quantity (hydrology). It is noted that there will be a separate permitting process that will consider water withdrawal for Project support that will occur following the EIS. Monitoring, including of water withdrawal rates and of potential effects (e.g., change in water flow, change in lake levels) will be implemented as the Project moves forward. Denison is committed to sharing information with Indigenous Communities of Interest (COIs) in a mutually agreed-upon fashion. Overall, the approach that will be utilized with respect to Indigenous community engagement will be aligned with Denison's Indigenous Peoples Policy. Denison's Indigenous Peoples Policy commits the company to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land. The relevant monitoring plans for the species/resources that support a traditional diet will reflect and incorporate these values and will be reflective of the Indigenous COIs priorities. The monitoring plans when drafted will include more detail about communication methods and their effectiveness would be assessed through ongoing engagement with Indigenous communities. As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous

			YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024) While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	peoples' connection to the land, and to minimize potential effects, wherever possible. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesųłiné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųłiné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųłiné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project. 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. A list of commitments, including specific commitment or mitigation measures related to Project effects as an outcome of engagement, made in the draft EIS, throughout the Federal information request period and the Provincial comment response period, will be included with the submission of the final EIS. For clarity, this would not include any private, confidential accommodations made under contractual agreements. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. 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It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.

384	YNLRO (March 4, 2023)	EIS Executive Summary, p. 26	**YNLR Comment March 4, 2023** Comments #16 and 17, Appendix A: YNLR supports Denison's corporate Indigenous Peoples Policy (IPP) and looks forward to collaborating with Denison to ensure that the Project's socioeconomic benefits reach local Indigenous People. YNLR acknowledges that Denison incorporated the YNLR report into the EIS and looks forward to further working with the company collaboratively regarding the rights of Indigenous People. YNLR is interested in an impact benefit agreement with Denison ensuring mutual benefits from the Project and co-management of environmental monitoring and mitigation. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** "YNRL will be informed throughout the monitoring program design and implementation process." Once again this is an unacceptable delay and does not go beyond the original statements in the EIS. Prior comments made, as to the extent of YNLR collaborative involvement, in planning and execution of monitoring is reiterated. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects, wherever possible. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesųłiné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųłiné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųłiné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project. 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. A list of commitments, including specific commitment or mitigation measures related to Project effects as an outcome of engagement, made in the draft EIS, throughout the Federal information request period and the Provincial comment response period, will be included with the submission of the final EIS. For clarity, this would not include any private, confidential accommodations made under contractual agreements. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the

				conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
385	YNLRO (March 4, 2023)	EIS Executive Summary, p. 26, 28 and 59 Land and Resource Use, p. 11- 52 and 11-53	**YNLR Comment March 4, 2023** Comments #18, 19 and 29, Appendix A: - Indigenous People, communities, and organizations YNLR represents are rights holders, and are not to be arbitrarily grouped and treated as non-rights holders. This is an important distinction, as the rights they hold are constitutionally protected. This must be respected and recognized in the ongoing dialogue between the company and Indigenous Peoples through their chosen representatives, like YNLR. - The Athabasca Denesųłiné people are rights holders and not stakeholders with respect to the Project. These rights include full access and use of the natural resources of the area. Any proposed infringement on these rights by the Project will need to be discussed well ahead of the Project's start date. Comment #86, Appendix A: The EIS minimizes effects of Lands and Waters availability and access on northern residents and Indigenous Peoples. Any impairment to the ability of Indigenous Peoples to utilize their Aboriginal and Treaty rights to the use of natural resources for their traditional activities constitutes an infringement of those constitutionally protected rights and must be justified. Rigorous examination of these impacts and negotiated compensation for these impacts should therefore be seriously considered. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison acknowledges the comment. In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the YNLR office in a mutually agreed upon manner and will continue to do so. Denison's approach to identifying Indigenous COIs considered several factors as identified in Section 4.3.1 of the EIS. Being signatories of Treaty 10 was among, but not the sole applicable criteria, and not all Treaty 10 communities are considered as Indigenous COIs for the Project. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesųłiné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųłiné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųłiné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. With respect to Denison's consideration of Indigenous Knowledge shared by the Athabasca Denesųłiné knowledge sources, Denison notes that Tables 3.5-1 will be updated to better reflect where the YNLR's An Exploration of Recorded Athabasca Denesųłiné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of the Denison Mines Wheeler River Project, which was included as an Appendix to the EIS, was considered and included as Table 3.5-1 does not reflect all instances the report was utilized. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 385. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
386	YNLRO (March 4, 2023)	EIS Executive Summary, p. 52	**YNLR Comment March 4, 2023** Comments #24 and 25, Appendix A: Fish, fish habitat, and fish health are all extremely important to northern people of Saskatchewan, and especially Indigenous People. Wild fish are a culturally important source of protein and provide economic opportunities in the form of commercial fishing and recreational angling. - YNLR will be eager to and expects to be involved in collaborating with Denison in the future monitoring of these vital natural resources. - Based on existing federal fishers legal and policy requirements, YNLR expects that all fish habitat destroyed or altered by the Project will be more than offset.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. Denison expects that important country foods harvested for food and cultural purposes (e.g., moose, fish, etc.), surface water quality, and other areas of interest will form parts of these monitoring programs, including other areas of potential concern as they evolve over time. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. The specific potential for need for approval(s) under the Fisheries Act related to effects on fish

			YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023) There is no monitoring plan developed yet to substantiate Denison's determination here. YNLR continues to state its desire for collaboration in the development of monitoring analysis and assessment plans. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	and fish habitat (i.e., harmful alteration, disruption and destruction) resulting from Project activities has been assessed and presented in the draft EIS. Based on the assessment, Denison has determined that effects can be avoided and mitigated and therefore there will be no need for fish habitat offsets under the Fisheries Act. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
387	YNLRO (March 4, 2023)	EIS Executive Summary, p. 54 and 55	**YNLR Comment March 4, 2023** Comment #26, Appendix A: YNLR places a high priority on wildlife and wildlife habitat, from both ecological and sociocultural perspectives. Given the long-time frame of the Project, YNLR are concerned about the lack of significance associated with the residual and cumulative effects assessments of all ecological VCs. YNLR believes that the addition of this mine with its associated disturbances will have a cumulative effect on wildlife, especially for woodland caribou, as the area is already crisscrossed with many kilometres of seismic cut lines through the LSA, RSA and beyond (Figure 9.2-6, page 9-83, EIS and Appendix 9B). YNLR maintains that in order for the Project to meaningfully attempt to mitigate this concern, the company must work with Indigenous partners to create an effective habitat offset plan for this species. This should form part of any project approval. Such a plan should, for instance, include steps to restore the considerable caribou habitat degraded by past mineral exploration activities.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the

			YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023) Public comment #387: The consideration of offsets in the decommissioning plan is not appropriate as a substitute for considerations of offsets in a present-day mitigation plan. Offsets are a method to address current habitat damage from the impacts of development while mitigation is underway. Offsets augment habitat requirements now and into the future. Consideration of offsets in a decommissioning plan is primarily for the damage that could not be mitigated in a preceding mitigation and management plan. YNLR reiterates its stated desire to collaborate, now, with Denison in the development of all plans for monitoring and mitigation. Notification to YNLR by Denison for plans and processes after their development is complete is not acceptable. Restoration of the area to pre disturbance conditions could be considered as an 'offset'. As long the DDP is done well in advance, it doesn't matter. However, the discussion for offsets should really be considered during the life of the mine, not afterwards. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** Public comment #387: While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development. YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed. YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR's interest in the details of Denison's caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR's GIS based Method for Assessing Cumulative Environmental Effects). Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.	draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Public comment #387: Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. YNLR has shared comments with respect to Woodland Caribou offsets, including those related to the definition of offsets, timing, and mitigation measures as part of present-day mitigation measures for the Project, and should be applied in advance of decommissioning. YNLR has also requested to see the predecommissioning monitoring plan for containment releases. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided a document titled Summary of Monitoring, which outlines the Project's commitments for monitoring programs for all phases of the Project from preconstruction to post decommissioning. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward.

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388	YNLRO (March 4, 2023)	EIS Executive Summary	**YNLR Comment March 4, 2023** Comment #27, Appendix A: Indigenous People have brought forward concerns with the extensive network of seismic cut lines at several places in the EIS. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** YNLR has not been privy to any caribou mitigation and offset discussions to date and would like to be as soon as possible. Consideration of offsets in a site decommissioning plan must be based on the results and analysis of an ongoing mitigation/offset plan that is in-place and functioning from the point of inception. Further to this, the ongoing results of the in-place mitigation/offset plan are obtained for analysis from an active and comprehensive monitoring plan that is also in place from the point of inception. Both of these issues reinforce the YNLR position that they need to be involved in the collaborative development and implementation of monitoring and other plans. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development. YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed. YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual

			caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR's interest in the details of Denison's caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR's GIS based Method for Assessing Cumulative Environmental Effects). 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Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project's detailed decommissioning plan. Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison's previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.

389	YNLRO (March 4, 2023)	EIS Executive Summary, p. 59	**YNLR Comment March 4, 2023** Comment #28, Appendix A: While the overall direct footprint of the Project is relatively small, YNLR maintains that any wildlife habitat destroyed or altered by the Project should be more than offset or compensated for in some fashion. One example would be the additional disturbance created by the proposed Highway 914 extension. This needs to be accounted for by Denison. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** See above stated comments on CE, WLC and offsets. **YNLR Comment June 19, 2024 (Response to Denison Comment April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development. YNLR has provided its responses on caribou offsets and other aspects of caribou restoration and mitigation planning in the responses contained in their letters of 02 February 2024 and 13 March 2024. The concerns expressed in those responses remain valid and unaddressed. YNLR did request from Denison, in their meeting of 22 Feb 2024, specific information as to where their caribou offsets are located and what was the information and methodology used to determine these offsets, however, Denison declined to provide this information. Additionally, YNLR is also on record with CNSC and Denison (see attached letters at appendix 3) that there is a divergence of opinion of the results of the YNLR and Denison Cumulative Effects analysis. Given that the results of the CE analysis is the basis for how much land, suitable for caribou, is required for offsetting: YNLR's interest in the details of Denison's caribou offset plan is a valid concern (see Appendix 3 for a review of YNLR's GIS based Method for Assessing Cumulative Environmental Effects). Respecting preliminary decommissioning plans: decommissioning plans are based on the extent to which restoration and offsetting are carried out prior to decommissioning, therefore while their receipt from Denison is appreciated any conclusions that can be determined from this plan is incomplete without the former requested information on offset plans. Therefore, YNLR concerns stated in their comments remain valid and unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** To be clear, Denison's proposed Project does not require any extension to the existing Highway 914. There is a Highway 914 extension project under evaluation by the Ministry of Highways, but this project is not related to or ancillary to the Wheeler River Project. As noted in response to other comments, through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. No other specific needs for "offset" have been identified based on the effects assessment. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. YNLR has shared comments with respect to Woodland Caribou offsets, including those related to the definition of offsets, timing, and mitigation measures as part of present-day mitigation measures for the Project, and should be applied in advance of decommissioning. YNLR has also requested to see the predecommissioning monitoring plan for containment releases. As an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided a document titled Summary of Monitoring, which outlines the Project's commitments for monitoring programs for all phases of the Project from preconstruction to post decommissioning. Details of monitoring will be developed prior to, and applicable for each phase of the Project, including decommissioning. Denison has also provided YNLR with the Preliminary Decommissioning Plan, of which Denison offers to include YNLR in discussions as more details are developed for the Preliminary Decommissioning Plan. Denison has also provided YNLR with the Draft Caribou Management Framework, which outlines mitigation and restorative measures within the Provincial government framework. Denison welcomed feedback on the Draft Caribou Management Framework and remains open and willing to receive additional feedback. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the

				EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances. Denison is committed to the development of a caribou mitigation and offsetting plan for the Project. This plan will be developed ahead of construction and independent of the development of the Project's detailed decommissioning plan. Denison provided the YNLR with a draft Caribou Management Framework which outlines mitigation and restorative measures within the Provincial Government framework. Denison continues to remain open to feedback from the YNLR on the draft Caribou Management Framework. Further, Denison's previous offer to involve the YNLR in discussions with respect to the development of the decommissioning plans still stands. Decommissioning plans at this stage are conceptual as outlined in the EIS and will continue to be refined through each phase of the Project as it progresses.
390	YNLRO (March 4, 2023)	EIS Executive Summary Monitoring Programs, p. 74	**YNLR Comment March 4, 2023** Comment #30, Appendix A: YNLR expects to be included as part of the design and implementation of all monitoring programs. All such programs should be transparent, arm's length, include significant involvement and participation of Indigenous People, communities, and organizations and be statistically robust. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** See comments above on YNLR collaboration in the development and implementation of monitoring plans. YNLR needs a general statement concerning requested collaboration in management and monitoring plans. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. Denison expects that important country foods harvested for food and cultural purposes (e.g., moose, fish, etc.), surface water quality, and other areas of interest will form parts of these monitoring programs, including other areas of potential concern as they evolve over time. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." 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. Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial

				boundaries that are sufficiently extensive to measure EIS predictions. Additionally, regulators will be involved with setting specific requirements for follow-up and monitoring, as well as reporting, through licence conditions (CNSC) and provincial approvals. A number of monitoring and reporting requirements will be generated through the completion of the environmental assessment process. Denison and its lifecycle regulators will be in regular communication throughout the life of the Project as part of routine reporting, site inspections, licence and permit renewals. Denison is committed to ongoing engagement with regulators and recognizes that this will include information sharing related to follow-up and monitoring results and any needed adaptive management plans. It is also noted for further reference that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm), and the Eastern Athabasca Regional Monitoring Program (www.earmp.ca/). Results from these programs provide relevant information and can complement Denison's Project-specific monitoring program. One forum for discussion of monitoring results is the Northern Saskatchewan Environmental Quality Committee (https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis- and-northern-initiatives/northern-Saskatchewan-environmental-quality-committee). **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR

				identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
391	YNLRO (March 4, 2023)	EIS Executive Summary, p. 76	**YNLR Comment March 4, 2023** Comment #31, Appendix A: The EIS states: "On the basis of the Project information and related evaluation and assessment of effects, Denison believes that the Project can be constructed, operated, and decommissioned in a manner that is not likely to cause significant adverse effects to the biophysical or human environments." This is perhaps an overly optimistic conclusion. However, YNLR is willing to discuss how the company moves forward and is interested in creating more formal processes to achieve this, such as the signing of an impact benefit agreement. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** This is not an open comment or invitation by Denison to address this concern with any process, commitment, or funding. Further to this; there is no indication in the response that Denison even accepts the YNLR comment hence this issue, raised in the original comments to Denison's EIS remains unresolved. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** No further response provided by YNLR as per letter dated June 19, 2024.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison notes YNLR's perspective on this. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison and YNLR have collaborated on an appropriate process in relation to the identified comment made by YNLR and both parties are actively working together in this respect. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** No further response from YNLR as per in letter dated June 19, 2024. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.
392	YNLRO (March 4, 2023)	Section 1.0 Project Introduction and Overview, p. 1-1, 1-5 and 1-18	**YNLR Comment March 4, 2023** Comments #32 and 33, Appendix A: The Project is located within Nuhenéné and of principal concern to YNLR is that the Project be fully sustainable with respect to cultural rights and traditions, socioeconomic equity, and environmental protection. To achieve this end, YNLR expects Denison to work collaboratively with the people of Nuhenéné through the YNLR office. YNLR supports the sustainable mining of uranium within Nuhenéné. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison notes YNLR's perspective on this. In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the Nuhenéné through the YNLR office in a mutually agreed upon manner and will continue to do so. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 392. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
393	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment, p. 8.-38	**YNLR Comment March 4, 2023** Comment #34, Appendix A: The EIS recognized that the utilization of water will result in an adverse impact on the drainage but dismissed the issue given that a reduction in the stream flow rate is expected to be less than 3%. It would therefore be prudent to closely monitor the flow regime to identify possible adverse effects throughout the life of the Project. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** This comment by Denison is encouraging in that it accepts YNLR's concern for a monitoring requirement. However, it does nothing to address YNLR's position that is must be	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** In the draft EIS, conservative estimate of water taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm. While this incrementally small change in water quantity is beyond the ability of monitoring techniques to practically measure, Denison will conduct hydrological monitoring. Monitoring will likely include streamflow and lake level monitoring as well as continuous monitoring with stage dataloggers with details of monitoring plans to be finalized to support Project permitting and licensing. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)**

			collaboratively involved in all plans' development and implementation. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
394	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment, p. 8-40, 8-42, 8-98 and 8-99	**YNLR Comment March 4, 2023** Comment #35, Appendix A: Utilizing the extent of the LSA and the fact that it does not overlap with projects located within the same drainage system seems to be quite arbitrary and convenient. By this criterion, each mine does not trigger a cumulative effect according to the EIS, although they are all additive to the water flow regime. This methodology then arbitrarily and conveniently determines that "mitigation measures" for each of the mines is not warranted since there was a determination of no cumulative effects in sections 8.1.7.1, 8.1.7.2, 8.1.7.3 and 8.1.7.4. Comment #36, Appendix A: The determination of Cumulative Effects Characterization and the resultant Determination of Significance is highly subjective, therefore a much more extensive monitoring program is required. Such a program should start prior to the construction phase and carry on at least several years into the operation portion of the Project to at least demonstrate local and cumulative effects of mining projects within the watershed. Comment #37, Appendix A: YNLR agrees that the hydrological monitoring program remain throughout the life of the Project but as per the above, the study should have a much broader	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** In terms of watersheds and nearby uranium operations, only Key Lake Operation's drainage area interacts with the Wheeler River Project. Drainages from both operations would combine at Russell Lake. As such, the Key Lake Operation was included as an existing project in the CEA sections of the aquatic environment. The drainages associated with McArthur River Operation and Cigar Lake Operation are separate from the Project. The RSA is the area that surrounds and includes the LSA, and was established to assess the potential, largely indirect effects of the Project, as well as other activities, in a regional context. The RSA is large enough to capture the extent of potential effects (i.e., zone of influence) on a VC and defines the area within which cumulative effects may occur (i.e., cumulative effects assessment boundary). The RSA for the Surface Water Quality VC is bounded by the regional watershed area in which the Project Area is located. The RSA for this assessment is based on the whole watershed within which the Project is located and extends downstream to include Russell Lake (refer to draft EIS Figure 8.2-3). Given the very low magnitude of predicted changes in water quantity in the LSA (in the draft EIS, conservative estimate of water taking would result in a reduction of flow of about 3% at times of low flow and the lake level could change by 1cm), it would not be measurable further downstream into the RSA. The CEA considers whether residual adverse effects of the Project on a given VC will overlap

			mandate in order to measure local and regional effects on VCs. Comment #41, Appendix A: YNLR is concerned that the conclusion that the residual effects from Project operations will not have an adverse effect on surface water is highly speculative. Again, this indicates the need for a comprehensive monitoring program to validate the speculation on water quality with rigorous statistical evidence. Comment #42, Appendix A: YNLR questions the logic track that states, "additional mitigation measures not warranted" because of the determination of no cumulative effects, then "a determination of significance is not warranted" as no cumulative effects were identified for water quality because surface water impacts are expected to remain localized…for all the mining operations in the region. Impacts on water quality and mitigation measures "not warranted" should be demonstrated through field studies and research rather than relying on a theoretical modelling approach. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** These comments do not address the YNLR's original concern (the residual effects from Project operations will not have an adverse effect on surface water is highly speculative) and the above stated requests for collaboration at the conceptual and methodological stages of monitoring development are reiterated. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	spatially and/or temporally with the same residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. The CEA follows standard methodology as per provincial (e.g., Guidelines for an Environmental Assessment) and federal guidance (e.g., Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012). Cumulative effects assessment is important to Indigenous communities in general because incremental effects to the environment can weaken resource economies, affect important resources such as plants, fish, and wildlife, affect rights-based and cultural activities, and affect both the health of wildlife and humans. Indigenous perspectives can be complementary to the CEA for the Project, and Denison acknowledges the important relationship of the Indigenous Communities of Interest to the lands and waters. The Indigenous Communities of Interest of ERFN and the Kineepik Métis Local #9 at Pinehouse (KML) have shared their Indigenous Knowledge on past, present, and predicted cumulative effects through the following: • Wheeler River Project – Summary of Health and Socio-Economic Study Results (ERFN and SVS 2022a); • Wheeler River Project - Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b); • Kineepik Valued Ecosystem Components – KML Pre-statement for Denison EIS (KML and NVP 2022); and • Response to the Environment Impact Assessment For the proposed Ministry of Highways 914 Extension Project (KML and Limnos Environmental 2022). These perspectives on cumulative effects have been summarized in Section 3.4.8 of Section 3. Denison and the Communities of Interest agreed on the high value of this contribution being part of the EIS. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward.

				It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
395	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment, p. 8-92, 8-93 and 8-96	**YNLR Comment March 4, 2023** Comment #40, Appendix A: There are several comments in the EIS that recognize the potential for a negative effect on water quality from the site water management system into Whitefish Lake. Statements taken from residents have identified concerns about the release of elements such as "mercury" because of the mining activity. While the report recognized that detectable concentrations of mercury will not be produced, the local comment should be considered as a proxy for a variety of contaminants such as selenium, arsenic, cobalt, zinc, etc., as well as the concern expressed by residents, rather than being taken literally as mercury as the only contaminant of concern. YNLR reiterates that concerns about water quality are warranted given that the EIS indicates that there will be a continuous (year-round) average discharge of water from the mine site of more than 36,000 litres/hour for the entire life of the Project. This discharge will be especially evident during low flow periods. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** The comment from YNLR references text in Section 8.2 of the draft EIS which is the water quality assessment. Please refer to draft EIS Section 8.1 for the water quantity assessment and information on potential changes in water flow. Denison acknowledges the concern raised by YNLR and believes the water quality assessment, including the assessment of potential water quality effects on ecological and human health, presented in the EIS and supporting documentation is robust and supports the conclusions drawn. With regard to YNLR's concerns around contaminants in treated effluent, we refer YNLR to Appendix 10-A Environmental Risk Assessment (ERA) for Wheeler River. The ERA predicts and assesses the risk to representative human and ecological receptors resulting from exposure to radiological and non-radiological substances expected to be released throughout the Project Phases. The ERA encompasses a human health risk assessment (HHRA) and an ecological risk assessment (EcoRA), which have been prepared to be compliant with Canadian Standards Association Group (CSA) N288.6-12 Environmental Risk Assessments for Class I Nuclear Facilities and Uranium Mines and Mills (CSA, 2012). It also meets the requirements for an ERA outlined in Section 4.1 of Regulatory Document 2.9.1, Environmental Principles, Assessments and Protection Measures (CNSC, 2020). The ERA has been developed with current science and current regulatory attitudes in mind. The predicted radiological and non-radiological to human and ecological receptors demonstrate that the Project can be conducted in a manner that is protective of human and ecological health. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 395. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR As a result of the continued technical review until October 2024, Denison has included a commitment to assess health risks from local fish consumption by comparing fish tissue data collected during operation from the monitoring program against Health Canada's mercury guideline.

396	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment, p. 8-102	**YNLR Comment March 4, 2023** Comment #43, Appendix A: While appreciating current water quality standards, YNLR suggests that monitoring programs be designed to more than meet regulatory requirements of the license conditions. The EIS recognizes that the Project area lies primarily within an undisturbed area of the boreal forest (aside from the extent of seismic activity carried out within this area). YNLR would like to be involved in specific follow-up and monitoring plans as identified in the EIS. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** See comments above on YNLR collaboration in the development and implementation of monitoring plans. YNLR needs a general statement concerning requested collaboration in management and monitoring plans. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. Denison expects that important country foods harvested for food and cultural purposes (e.g., moose, fish, etc.), surface water quality, and other areas of interest will form parts of these monitoring programs, including other areas of potential concern as they evolve over time. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." 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. Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions. Additionally, regulators will be involved with setting specific requirements for follow-up and monitoring, as well as reporting, through licence conditions (CNSC) and provincial approvals. A number of monitoring and reporting requirements will be generated through the completion of the environmental assessment process. Denison and its lifecycle regulators will be in regular communication throughout the life of the Project as part of routine reporting, site inspections, licence and permit renewals. Denison is committed to ongoing engagement with regulators and recognizes that this will include information sharing related to follow-up and monitoring results and any needed adaptive management plans. It is also noted for further reference that there are existing, non-Denison monitoring programs such as the CNSC's Independent Environmental Monitoring Program (https://nuclearsafety.gc.ca/eng/resources/maps-of-nuclear-facilities/iemp/index.cfm), and the Eastern Athabasca Regional Monitoring Program (www.earmp.ca/). Results from these programs provide relevant information and can complement Denison's Project-specific monitoring program. One forum for discussion of monitoring results is the Northern Saskatchewan Environmental Quality Committee (https://www.saskatchewan.ca/residents/first-nations-citizens/saskatchewan-first-nationsmetis- and-northern-initiatives/northern-Saskatchewan-environmental-quality-committee). **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22,

				2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
397	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment Fish and Fish habitat, p. 8-117, 8-140, 8-141, 8-153, 8-252 and 11-50	**YNLR Comment March 4, 2023** Comment #44, 45, 46, 49, 52 and 84, Appendix A: It is noted that the aquatic survey and fish sampling were carried out in 2016, which is now somewhat dated. It is also noted that work that would affect fish and fish habitat could/should only be carried out between July 16 and September 30th, as both spring and fall spawning species were collected in the fish sample. YNLR acknowledges that the amount of fish habitat directly affected by the Project is small. However, a much bigger concern is the indirect effects of increased human activity in the area over several decades and beyond, particularly with respect to the consequent increase in fish harvest. This will directly affect the ability of Indigenous Peoples to exercise their Aboriginal and Treaty rights. Related comments: - YNLR would be eager to see how "a fish salvage plan to relocate fish prior to in-water works" might be carried out? Such an approach may not be practicable or effective. - While the sentiment of the above fish management strategy is laudable, it is not practical in terms of preserving fish numbers given the increased human access to the lakes that the mining activity will create. - The EIS does recognize the value of sucker species to residents, which is a positive step, as these fish species are netted for a variety of purposes. Increased local traffic will also undoubtedly provide more access for both subsistence and recreational fishing. As part of the mitigation measures YNLR proposes working with authorities to regulate recreational fishing prior to the onset of the construction phase of the Project and revisiting these regulations at	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** The response to the review comment are organized by theme, consistent with the comment. Fish salvage: Details of a fish salvage program, if required, will be developed to support Project permitting and licensing. Briefly, for any in-water work, the work area would be isolated from rest of the waterbody. Any fish remaining inside the isolated work area would be captured and relocated outside of the work area. Based on the experience of Denison and its SME team it is noted that such programs are implemented successfully on a routine basis with effective and site-specific planning. Indirect effects related to increased human activity in the area: Please note that the Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. The proposed operation is fly-in, so Project related traffic to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles and will largely be "confined" to the camp and work areas during their shifts. Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. Recreational fishing: As described in the draft EIS and as noted above, 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

			intervals throughout the mine's operation and decommissioning. - YNLR disagrees with the assumptions used (Section 8.3.7.2 to 8.3.7.5), which "assume" specific monitoring and follow-up for Fish and Fish Habitat related to cumulative effects is not warranted. - YNLR would like to be involved in designing and carrying out of a monitoring program, which would test the "no cumulative effect" assumption. - YNLR would like to be involved in a monitoring program for fish health. Further, this monitoring program should continue for the life of the Project or until it is demonstrated that the current filtering programs are effective. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** YNLR looks forward to the details on how this collaboration will be conducted. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** While encouraging, this still does not address YNLR's concerns as stated in their responses in their letters of 02 February 2024 and 13 March 2024. From the beginning, of their review of Denison's EIS and revised EIS YNLR, has been consistent in their request to be "involved in all monitoring and other plans at a conceptual level when experimental design and methodologies are being developed". Denison has been consistent in their responses "to share further information about plans as they are developed". The Denison response, explicitly, does not address YNLR's concerns stated in YNLR's letters of 02 February 2024 and 13 March 2024. Hence these concerns remain. YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development.	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. To prevent entry of land users from entering the Project Area, Denison will control access to the property with both a north and south security gate. Overall, given a lack of resources to access fishing locations and store fish harvests, workforce fishing is expected to cause minimal disturbances to local users. Monitoring: In the draft EIS, Denison outlines its plans to conduct fish health monitoring 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. Denison has committed to collaborating with Indigenous Communities of Interest with reserves and residential communities most proximal to the Project on specifics of environmental monitoring regimes, suited to each of their interests and needs. As part of these programs, Denison and the Communities of Interest will be sharing information in an agreed-upon fashion. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries are sufficiently extensive to measure EIS predictions. Denison is committed to maintaining positive relations with all local interested parties and will be open to discussions on any issues or concerns that arise. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** Denison is committed to working with YNLR to share information about monitoring plans as they are developed through the permitting and licencing process. In a meeting between YNLR and Denison on February 22, 2024, it was noted by YNLR's consultants that the areas of immediate interest to YNLR are surface and groundwater, aquatics, wildlife, and Woodland Caribou monitoring. As noted in the meeting, the detailed monitoring plans are not yet developed given the stage of the Project in the regulatory process. Given the number of plans and procedures to be developed it would be helpful for Denison and YNLR to work together to establish a process for next steps. Further, as an outcome of a meeting between Denison and YNLR on February 22, 2024, Denison provided YNLR a document from the draft Wheeler River Environmental Impact Statement (EIS) titled Summary of Monitoring. The document outlines the conceptual monitoring program for all stages of the Project and how they tie to each Valued Component assessed in the EIS. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** YNLR expressed the desire to be involved in the program design and development of all monitoring and other plans at a conceptual level when experimental design and methodologies are being deployed, stating that, "YNLR interprets the notion of 'sharing' information after its been developed as being non-collaborative and we prefer being 'involved' in the program/plan design and development." Denison feels it is important to clarify the processes related to the development of various monitoring programs for the Project and the manner in which involvement can occur with interested Indigenous nations, such as those represented by the YNLR. As a starting point, the EIS contains conceptual level information for various monitoring plans associated with the Project, commensurate with the requirements for an environmental assessment, the primary basis of which is informed by regulatory guidance and requirements. The conceptual monitoring plans also take into account any input received through engagement activities, where appropriate. As the Project advances into permitting and licensing, the conceptual monitoring plans evolve into detailed monitoring plans, the designs of which must adhere to Provincial and Federal regulatory requirements but can be further enhanced by the involvement of the YNLR and other Indigenous communities. Denison provided the summary of monitoring and follow-up programs (Section 16 of the EIS) to the YNLR as an outcome of the February 22, 2024 meeting, with the request to identify those items of further interest to the YNLR to enable the co-development of a path forward. It is Denison's perspective that, in order to advance a meaningful process to further involve the YNLR in the development of the monitoring plans, it is necessary for Denison to understand the key areas of interest to the YNLR. This was the basis of Denison's request whereby the YNLR

				identify a starting point for this exchange, based on the conceptual monitoring programs provided in the EIS. In the absence of specific feedback on the conceptual monitoring plans/programs, Denison re-iterates its commitment to providing the YNLR with the detailed monitoring plans, as developed through the permitting and licensing process, for input and collaboration as the Project advances.
398	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment, p. 8-151	**YNLR Comment March 4, 2023** Comment #47, Appendix A: The statement on page 8-151 recognizes that the discharge of treated effluent during the Operation and Decommissioning phase may interact with Cameco's current releases contributing to cumulative effects. It is recommended that a study be undertaken to assess the basin effect of water discharges. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** The requested information is presented in draft EIS Section 8.2.7 Cumulative Effects (surface water quality). The summary referenced in the YNLR comment is made in Section 8.3 Fish and Fish Habitat. 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 interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC-specific program. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 398. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
399	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment, p. 8-152	**YNLR Comment March 4, 2023** Comment #48, Appendix A: Sediment quality of Whitefish Lake and downstream is not "anticipated" to overlap with the Key Lake Operation. It would be prudent to test this hypothesis to ensure that water quality in the flowage is maintained given the high value placed on these waters by residents. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Any changes in sediment quality would be preceded by changes in surface water quality. Should the surface water quality monitoring program identify changes beyond those predicted in the EIS, adaptive management measures would be implemented and may include monitoring of sediment quality further downstream in the watershed. In addition, the Environmental Effects Monitoring (EEM) program under the Diamond Mining and Effluent Regulations will provide a framework for monitoring changes in the aquatic environment. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 399. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

400	YNLRO (March 4, 2023)	Section 8.0 Aquatic Environment, p. 8-232	**YNLR Comment March 4, 2023** Comment #51, Appendix A: Water management during construction indicates that there is to be no planned discharge to Whitefish Lake. If a release of water from the mine site becomes necessary, in addition to monitoring suspended solid levels, there should be a communication plan to inform area residents of the pending release and its duration. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** During Construction, no effluent is expected to be released to the aquatic environment. Contact water stored in the Clean Waste Rock Pond during Construction will be held onsite until the Industrial Wastewater Treatment Plant (IWWTP) is commissioned. At that time the water from the pond would be conveyed to the IWWTP, treated, and released to Whitefish Lake per permit / license requirements. The sequencing of Construction activities will occur in a logical manner based on Project execution plans. For example, construction of the wellfield runoff pond will be prioritized during the early part of Construction, and it will be able to hold 38,200 m3 of water. This will provide contingency and additional water storage capacity if contact water produced exceeds estimates or the volume available in the Clean Waste Rock Pond. Other secondary contingency measures are also available should the volume of water requiring management exceed site infrastructure storage volume. Depending on the situation and volume of water needing management, this could include for example use a hydrovac for offsite disposal. Alternatively, in the instance that there is a planned release of water during construction, this would be permitted by Saskatchewan Ministry of Environment. In accordance with our Indigenous Peoples Policy, Denison is committed to collaborating with Indigenous peoples and communities to build long-term, respectful, trusting, and mutually beneficial relationships. Denison has identified key objectives respecting Indigenous engagement associated with the Project: • Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency. • Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion. • Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects. In addition, Denison is required to have a Public Information Disclosure Protocol as set out by the CNSC. This would include any notification to the wider public of unplanned discharges. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 400. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
401	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment Fig 9. 2-6, p. 9-83	**YNLR Comment March 4, 2023** Comment #53, Appendix A: YNLR is concerned about the potential residual and cumulative effects of the extensive seismic network on the soils of the RSA and LSA. Were these and other potential network effects considered in the analyses? **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support

				licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 401. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
402	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment Appendix 9B, p. 60 Also, p. 9-68, Fig 9. 2-9, 9-133, 9-139 and 9-149	**YNLR Comment March 4, 2023** Comment #54 and 55, Appendix A: Appendix 9B of the EIS states that 100% of the LSA and 82% of the RSA are already disturbed by buffered anthropogenic disturbances in the form of exploration lines, exploration trails, and seasonal roads. During the consultation process, residents raised the issue of the high degree of human disturbance and highlighted concerns about the broad network of linear disruptions in numerous places across the EIS. As with the Project soils, YNLR is concerned about the potential residual and cumulative effects of the extensive seismic network on the vegetation and wetlands of the RSA and LSA, particularly from edge effects. Were these and other possible effects of the network considered? If so, how were they included? **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 402. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

403	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, p. 9- 168	**YNLR Comment March 4, 2023** Comment #56, Appendix A: Wilson et al. (2018) recently summarized the home ranges of 25 woodland caribou populations in Canada. The average home range varied 28-fold, from 312 to 8,838 sq. km. The RSA delineated for assessing cumulative effects on caribou (40,174 ha ~ 402 sq.km.) is thus inadequate for this purpose, and the conclusions of project residual and cumulative effects non-significance are highly suspect. The same could be said for other wide-ranging species such as wolverine. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 403. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
404	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment Fig 9. 2-9	**YNLR Comment March 4, 2023** Comment #57, Appendix A: Was the current RSA anthropogenic disturbance estimate (599 ha) inclusive of the many kilometres of existing seismic cut lines? Did the estimate include consideration of the compounding 'edge effects' from these linear disturbances? If not, why not? See previous comments on the very high level of existing human disturbance in the LSA and RSA highlighted in Appendix 9B. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.

				Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024) There have been no further comments from the YNLR on EIS reference no. 404. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
405	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, p. 9- 239	**YNLR Comment March 4, 2023** Comment #58, Appendix A: Again, the direct and indirect effects of the existing seismic disturbance seem not to have been considered in this assessment, particularly because wolverines 'avoid linear infrastructure.' In fact, one can also see that woodland caribou avoid areas of historic seismic disturbance by directly comparing the figures on page 9-139, EIS (vegetation) and 9-202, EIS (caribou sightings). Appendix 9B gives a summary of the impacts of linear disturbances on boreal forest wildlife. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 405. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
406	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, 9. P- 239	**YNLR Comment March 4, 2023** Comment #59, Appendix A: Buffered disturbance is included in Appendix 9B but appears to have been ignored in the effects assessment. Was the 500m buffering of anthropogenic disturbances also applied to the network of seismic cut lines to account for edge effects? If not, why not? **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.'	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project

			YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 406. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
407	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment Table 9.3-23 and p. 9-270	**YNLR Comment March 4, 2023** Comment #60, Appendix A: Is the amount of initial 'available woodland caribou habitat' inclusive of the direct and indirect seismic cutline network effects? If not, why not? Irrespective of this, it appears that the LSA is being written off for woodland caribou for decades to come. See above comments with respect to Appendix 9B. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 407. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

408	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, p. 9-275, 9-280, 9-300, Section 11.0 Land and Resource Use, p. 11-46 and 11-	**YNLR Comment March 4, 2023** Comment #61, 62, 82, 83, Appendix A: The EIS correctly highlights the cultural importance of moose and woodland caribou to Indigenous People, which underscores YNLR's concerns regarding the conclusions of the residual and cumulative effects assessments of these species, particularly for caribou. YNLR questions the optimistic conclusions drawn by Denison regarding the ongoing availability of woodland caribou for traditional use. - The buffered direct habitat loss alone eliminates the LSA and RSA for caribou habitation for decades to come (Appendix 9B), so how can it 'sustain the regional woodland caribou population' in any way? - The reference to 'proven' mitigation measures is rather vague and requires further explanation. - YNLR is unaware of these proven mitigation measures, other than isolation from human disturbance. YNLR disagrees with this overall residual effects conclusion for these wildlife VCs, especially in regard to woodland caribou (Appendix 9B), for the following reasons: (i) Comment #64, Appendix A: In addition, the reason why SK1 holds one of the very few sustainable caribou populations despite a high level of forest fire, is because of currently very low levels of human intrusion, which suggests that the provincial and federal approval processes, BMPs, and mitigation measures have not been sufficient in the rest of the species' range throughout the entirety of Canada. (ii) Comment #83, Appendix A: Woodland caribou populations have strongly declined across Canada despite all types of project mitigation, so YNLR doubts that similar mitigation efforts will be effective here. A woodland caribou 'management' plan is not sufficient. YNLR believes that, at a minimum, Denison should commit to an aggressive caribou habitat offset plan before work on the Project begins. In addition, it is unclear what constitutes this proposed mitigation. A caribou management plan is proposed (Section 9), however nothing short of a full caribou habitat offset plan will suffice to sustain the region's population. Offset activities should include the ongoing restoration of the existing seismic lines, among other things. This work is best accomplished in consultation and collaboration with Indigenous People, their communities, and organizations. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". 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Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 408. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
409	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, p. 9-280, 9-287 and 9-302	**YNLR Comment March 4, 2023** Comment #62, 63, 64, 66, 67 and 68, Appendix A: Past and future direct and indirect effects of seismic line clearing appear to have been ignored in this assessment (Appendix 9B). The fact that most caribou sightings occurred away from seismically disturbed areas independent of habitat type supports this observation. YNLR disagrees with this overall residual effects conclusion for these wildlife VCs, especially in regard to woodland caribou (Appendix 9B), for the following reasons: - Comment # 63 and 64, Appendix A: The extent of past seismic line cutting is very high for both the LSA and RSA. However, direct and indirect (edge) effects on wildlife, especially woodland caribou, seem to have been overlooked or minimized. Future exploration disturbance should have been estimated and included based on the rate of historic disturbance if nothing else. - Comment #67, Appendix A: Most of these mitigation measures (listed on p. 9-308) are quite superficial and would contribute little to the long-term conservation of wildlife in the RSA and LSA. The proposed caribou management plan needs to be a fully developed Caribou Habitat Offset Plan given the extent of already altered habitat by seismic activities. Also note that this has a high potential for a direct impact on Aboriginal and Treaty rights. More, some Indigenous	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.

			People will likely take offence at the idea of the company 'facilitating access' to their inherent Treaty Rights. Significant consultation and collaboration with Indigenous People is required. Comment #69, Appendix A: Concern about the extensive network of seismic cut lines were also raised by Indigenous People at several places in the EIS. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 409. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
410	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment	**YNLR Comment March 4, 2023** Comment #65, Appendix A: Is it not possible to conduct modern mineral exploration without cutting miles and miles of seismic lines across the boreal forest? **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023**) No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 410. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

411	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment	**YNLR Comment March 4, 2023** Comment #68, Appendix A: Section 9.3.9 of the draft EIS indicates that with the implementation of the above (and additional) mitigation measures, the residual effects on the Ungulates, Furbearer, and Woodland Caribou VCs were assessed as follows: - Moose. Not significant: the residual effects of alteration and/or loss of available habitat and of change in mortality are not expected to result in a change that will alter habitat integrity to the point where it would not be able to sustain the regional ungulate populations or the integrity of the regional moose population to the point where it could not be sustained. - Furbearers. Not significant: the residual effects of alteration and/or loss of available habitat and of change in mortality are not expected to result in a change that will alter habitat integrity to the point where it would not be able to sustain the regional furbearer populations or the integrity of the regional furbearer populations to the point where they could not be sustained. - Woodland caribou. Not significant: the residual effects of alteration and/or loss of available habitat and of change in mortality are not expected to result in a change that will alter habitat integrity to the point where it would not be able to sustain the regional woodland caribou population or the integrity of the regional woodland caribou population to the point where they could not be sustained. YNLR believes this summary to be overly optimistic and somewhat inaccurate for the following reasons: - The RSA and LSA are too small relative to the home range of woodland caribou to serve as a basis for assessing residual and cumulative effects on the species. - Large portions of the RSA and LSA have been badly degraded by mineral exploration activities (particularly by line-cutting for seismic surveys; Appendix 9B), yet their direct and indirect (edge) impacts seem not to have been considered in the effects assessments. This is puzzling given the known impact that these features have on wildlife, especially caribou, wolverine, other predators, and many avian species. The EIS maps themselves clearly show an avoidance of these seismically-disturbed areas by woodland caribou. YNLR strongly believes that, at a minimum, an aggressive Caribou Habitat Offset Plan should be co-developed before Project work begins, and regular monitoring of the caribou population be conducted throughout the life of the Project. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Through the EA process to date, Denison believes it has identified areas where offset may be required based on Project-Environment interactions. To this end, Denison has made a specific commitment to develop a Caribou Mitigation Plan (a preliminary draft of which has been submitted in response to provincial and federal EIS review comments) that includes provision for potential habitat offset. Details of the habitat offset will be developed in collaboration with Saskatchewan Ministry of Environment. It is also important to consider the site decommissioning plan within this context, though such restoration activities are not typically discussed as "offsets". Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. Denison will continue to engage with YNLR on topics of interest. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 411. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
412	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, p. 9-320, 9-384, 9-389, 9-408, 9-413, 9-414, 9-454, 9-457, 9-460, 9-465, 9-469 Section 11.0 Land and Resource Use	**YNLR Comment March 4, 2023** Comment #69, Appendix A: in Section 9.4 of the EIS lists Raptors, Migratory Breeding Birds and Bird Species at Risk together (p. 9-320). YNLR questions how and why these three avian VCs were selected and grouped. The three VCs include dozens of breeding bird species with hugely varying habitat requirements, so it is difficult to see how it is possible to accurately predict Project effects for many of these species, especially when so many are lumped together in only one Migratory Breeding Birds VC. In addition, the scarcity of raptors and avian species at risk makes them poor candidates for effects assessments because of low sample sizes. Comment #72 and 73, Appendix A: With only two water-based species selected to represent all forest raptors in the Project area, the results and conclusions of this assessment are extremely limited. For the forest birds in particular, this is compounded by the non-inclusion of the historic network of seismic cut lines across the landscape (Appendix 9B), and the resulting underestimation of direct and edge effects.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** An EIS requires scoping in order to determine the appropriate content for the assessment and focus the EIS on key areas of concern and relevance. As per standard, accepted EA practice, the EA was organized by and focused on VCs. The VCs are aspects of the biophysical and human environments that will likely be affected (adversely or positively) by the Project. The VCs reflect identified scientific, local knowledge and Indigenous knowledge, and community interests regarding the Project and its potential effects and are typically identified early in the EA process as a result of questions and concerns raised through engagement with government departments and agencies, Indigenous and community groups, and the general public. Key Indicators are an important component or aspect of the VC that is expected to be affected (changed) as a result of the Project. The KIs may comprise subsets or a guild of the VC, certain aspects of the VC that may be affected by the Project and/or which have a particular importance. The three avian VCs (with Key Indicators in brackets) were: Raptors (bald eagle and osprey), Migratory Breeding Birds (waterbirds and waterfowl, upland game birds, and migratory songbirds), and Bird Species at Risk (common nighthawk, short-eared owl, yellow rail, rusty blackbird, and olive-sided flycatcher). The residual effects evaluation was completed on the Key Indicator species. The rationale for selecting these avian Key Indicators is available in Section 9.4.1.2. For instance, the inclusion of Species At Risk birds is a requirement of the Species at Risk Act and the CNSC's

			Comment #74, Appendix A: Species at risk generally make very poor indicators of ecological integrity/biodiversity because of their relative scarcity. In fact, three of the VC bird species at risk selected were not even detected during the Project surveys. This very low quantity and data quality greatly weakens any conclusions regarding the Project residual effects. Comment # 75, Appendix A: YNLR cannot find any mention of the extensive seismic line network impacts (Appendix 9B) included in the effects assessment for birds. This was also the case for the caribou and wildlife assessments. Comment #76 and 77: Appendix A: The selection of weak indicators and the ad hoc grouping of dissimilar species make these predictions quite unreliable. This potential error is likely compounded by the apparent exclusion of the direct and indirect effects of the existing seismic cutline network (Appendix 9B). Concern about these extensive network of seismic cut lines were also raised by Indigenous People at several places in the EIS. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	REGDOC 2.9.1 also notes that applicants should identify all biological species at risk in the area; the avian Species at Risk were not included in the EIS to be indicators of ecological integrity/biodiversity. The avian effects assessment was habitat based. The assessment methods used a conservative approach with the assumption that, following the implementation of site-specific mitigation measures, the proposed Project activities would have a residual effect on these species' guilds regardless of species presence on site. As described in the EIS, pre-construction surveys will be conducted prior to the commencement of any vegetation clearing or soil disturbance. Avian species will also be routinely monitored throughout the life of the Project. Results from the surveys and monitoring activities are expected to inform the adaptive management process to update Project design and identify the need for additional mitigation measures, if required. Denison is of the professional opinion that the data presented, and analysis provided in the avian assessment of the draft EIS is sufficient given 1) the local / regional environment, 2) the level of interaction of the Project with birds that is expected, and 3) because bird densities are not expected to be limited by habitat regionally. The Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments discusses how existing cutlines were considered in avian assessments. All past anthropogenic disturbances (which includes cutlines to support mineral exploration) were considered in the terrestrial environment assessments. These human disturbances were mapped and considered/addressed appropriately in Section 9 including the Existing Environment, Residual Effects Characterization, and Cumulative Effects Assessment sections, as they relate to Terrain, Soil and Organic Matter/Peat (Section 9.1); Vegetation and Ecosystems, Listed Plant Species and Wetlands (Section 9.2); Ungulates, Furbearers and Woodland Caribou (Section 9.3); Raptors, Migratory Breeding Birds, and Bird Species at Risk (Section 9.4). The cutlines were classified as previously disturbed and considered as low-quality habitat or no habitat, depending on the species being assessed and their habitat requirements. An anthropogenic layer is included on draft EIS, Figure 9.2-6, which includes geophysical cutlines. Please note that anthropogenic features were mapped at IKONOS 1:5,000. This anthropogenic layer is not listed under available habitat types for any of the wildlife or avian VCs in subsequent assessments (e.g., Figures 9.3-9 to 9.3-14, Figures 9.4-8 to 9.4-11, Figures 9.4-13 to 9.4-15) except for Common Nighthawk (Figure 9.4-12), which is a species that is known to use anthropogenic features. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 412. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
413	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, p. 9- 356 and 9-357	**YNLR Comment March 4, 2023** Comment #71, Appendix A: The EIS states: "I*n this assessment, alteration of habitat is defined as indirect habitat alteration where suitable habitat for the Raptors, Migratory Breeding Birds, and Bird Species at Risk VCs and their associated KIs remains physically intact but is rendered less suitable or unsuitable for their use. Sources of habitat alteration include Project-related habitat fragmentation (i.e., the breaking apart of continuous habitat into smaller, spatially distinct patches), edge effects (i.e., the influence of recently cleared areas on adjacent habitats), and sensory disturbance."* (Page 9-356, EIS)	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Please refer to the Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments for a discussion of how existing cutlines were considered in avian assessments. All past anthropogenic disturbances (which includes cutlines to support mineral exploration) were considered in the terrestrial environment assessments. These human disturbances were mapped and considered/addressed appropriately in Section 9 including the Existing Environment, Residual Effects Characterization, and Cumulative Effects Assessment sections, as they relate to Terrain, Soil and Organic Matter/Peat (Section 9.1); Vegetation and Ecosystems, Listed Plant Species and Wetlands

			"*A minimum patch size is often required to fulfill all required life requisites (Robbins et al. 1989, Askins 1994, Vance et al. 2003, Butcher et al. 2010). When available suitable habitat is below a minimum patch size threshold, individual birds may get displaced despite the continued presence of suitable habitat. As a result, patch size at the individual and population level may have a species-specific effect on habitat use and could affect reproductive success, health, and survival (Askins 1994, Villard et al. 1999, Vance et al. 2003, Suorsa et al. 2004, Butcher et al. 2010).*" (Page 9-357, EIS) "*Edge effects include the influence of recently cleared areas on adjacent intact habitats. Gradients of light intensity, temperature, wind, relative humidity, as well as snow accumulation and melt may occur along the border between cleared areas and intact habitats (Bannerman 1998, Kremsater and Bunnell 1999), which could alter habitat suitability for avian use. Bannerman (1998) suggested that the richness and density of generalist bird species may increase along forest edges based on the variety of vegetation and abundance of food (e.g., American Crow and Blue Jay. However, numbers of habitat specialist species (e.g., Red-breasted Nuthatch and Pileated Woodpecker may decrease near edges because they use edge habitats less frequently or avoid them (George and Dobkin 2002). The potential influx of individuals into edge habitats, or the potential displacement of individuals into other areas, may increase crowding and subsequent inter-and intra-specific competition for breeding habitat, food, and other resources (Hagan et al. 1996, Schmiegelow et al. 1997, Bannerman 1998, George and Dobkin 2002, Calizza et al. 2017).*" (Page 9-357, EIS) The above descriptions summarize the potential effects of the Project on breeding bird habitats. When wooded landscapes are subjected to widespread seismic activity, the same effects occur: continuous parcels of forest are divided by miles of cut lines, resulting in smaller habitat patches and greater habitat edge. As a result, bird species that prefer contiguous habitats are declining, while birds that prefer habitat edges are increasing. How will the EIS address already existing direct and indirect impacts of these historic seismic linear disturbances across the LSA and RSA (Appendix 9B) that were ignored. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	(Section 9.2); Ungulates, Furbearers and Woodland Caribou (Section 9.3); Raptors, Migratory Breeding Birds, and Bird Species at Risk (Section 9.4). The cutlines were classified as previously disturbed and considered as low-quality habitat or no habitat, depending on the species being assessed and their habitat requirements. An anthropogenic layer is included on draft EIS, Figure 9.2-6, which includes geophysical cutlines. Please note that anthropogenic features were mapped at IKONOS 1:5,000. This anthropogenic layer is not listed under available habitat types for any of the wildlife or avian VCs in subsequent assessments (e.g., Figures 9.3-9 to 9.3-14, Figures 9.4-8 to 9.4-11, Figures 9.4-13 to 9.4-15) except for Common Nighthawk (Figure 9.4-12), which is a species that is known to use anthropogenic features. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 413. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
414	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment	**YNLR Comment March 4, 2023** Comment #78, Appendix A: Why were amphibians excluded as a VC/KI? Bats? Both were surveyed (Appendix 9B). **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Subsequent to filing the draft EIS, Denison has developed a new Species at Risk appendix to Section 9 which will be included in the final EIS and has been included in the response to YNLR (a new SAR appendix (new Appendix 9-D) will be added to Section 9 of the final EIS. It has been included here as Attachment IR-131). This new EIS appendix lists all SAR species potentially occurring in the Project study areas, with links to applicable and appropriate mitigation measures described in the draft EIS. The new appendix also includes a summary of the life history requirements, the expected Project effects, proposed mitigation measures, and anticipated residual effects on bats and amphibians. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 414. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively

				develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
415	YNLRO (March 4, 2023)	Section 9.0 Terrestrial Environment, p. 9-474	**YNLR Comment March 4, 2023** Comment #79, Appendix A: Project monitoring programs specific to Raptors, Migratory Breeding Bird, and Bird Species at Risk VCs are critical, particularly the ongoing repeated surveys throughout the life of the Project, especially given the weak predictive basis for the effects assessments of the Project on breeding bird species. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** The framework for avian-related monitoring programs are available in Section 9.4.8 of the draft EIS. This includes a discussion of the anticipated adaptive management process. As described in the draft EIS, a wildlife monitoring plan will be developed to support permitting and licensing and implemented as the Project proceeds. The wildlife monitoring plan will provide details on the monitoring and follow-up programs outlined in Section 9.4.8 of the draft EIS. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 415. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
416	YNLRO (March 4, 2023)	Section 11.0 Land and Resource Use	**YNLR Comment March 4, 2023** Comment #80, Appendix A: YNLR would like to emphasize that natural resource use by Indigenous Peoples of northern Saskatchewan is of incalculable value, and the Project must not infringe upon the ability of Indigenous Peoples to exercise those constitutionally protected rights. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison acknowledges the comment. We believe that the work we have done to date with the YNLR, such as entering into an Exploration Agreement in respect of Denison's exploration activities, demonstrates our strong understanding of this YNLR emphasis. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 416. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

417	YNLRO (March 4, 2023)	Section 11.0 Land and Resource Use, p. 11-50, 11-57, 11-58, 11-79, 11-138 and 11-139	**YNLR Comment March 4, 2023** Comment #84, 87, 88 and 89, Appendix A: The EIS notes that "The presence of the Project workforce will increase the numbers of people in the ILRU LSA by an estimated 300 during Construction and 180 during Operation and Decommissioning." (p. 11-57) YNRL notes that: - This is a significant increase in the number and persistence of humans in the area, and despite these vague reassurances, YNLR believes that this increase will affect the ability of Indigenous Peoples to exercise their Aboriginal and Treaty rights and increase the pressures on the natural resources of the area. - YNLR believes that Denison provides an overly optimistic conclusion regarding the impacts of the Project on traditional resource use by Indigenous peoples. - One indicator of increased human activity is truck traffic. However, these numbers do not include non-truck traffic. How will Denison address this? As with the impacts on the traditional use of land and natural resources by Aboriginal and Treaty rights holders, the human presence in the region is going to increase, which in turn will put additional pressures on fish and wildlife resources. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Section 12.3.3.2.1 of the EIS describes how access north of the Key Lake gatehouse for employees of northern mines, Indigenous resource harvesters from select communities, cabin owners, and lease owners provides for controlled access to users. Further, Denison staff will not be allowed to hunt or fish. Denison expects to continue to work with Indigenous COI to share information about the proposed impacts of the Project in relation to the potential to adversely impact the exercise of hunting, fishing, trapping and the carrying out of traditional uses as a result of the Project. Information in this respect will be provided as an update to the EIS. Further mitigations identified in Section 12 include: • Air transportation will be used to transport most workers between the Project site and designated pick-up and drop-off points in communities. 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. • Denison's Environment, Health, Safety, and Sustainability Policy will be enforced. • Liaison with LSA communities and relevant authorities (e.g., RCMP, health and service providers) will continue. • 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) **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 417. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
418	YNLRO (March 4, 2023)	Appendix 16-A Summary of Residual Effects, p. 1	**YNLR Comment March 4, 2023** Comment #90, Appendix A: There are about three dozen Valued Component/Key Indicators that are assessed for the significance of residual effects (effects that remain after mitigation) from the Project. They include sediment quality, benthic invertebrates, fish and fish habitat, fish health, terrain, soil, organic matter, vegetation abundance, listed plant species, wetlands, ungulates (moose), furbearers (wolverine, pine marten, mink, muskrat), woodland caribou, raptors (bald eagle, osprey), migratory breeding birds (water birds and waterfowl, upland game birds, migratory songbirds), avian species at risk (5), human health and safety, Indigenous land and resource use, other land and resource use, heritage resources, traditional diet, community well-being (income and cohesion), traffic, infrastructure & services, and economics. The residual effects of the Project on all of these VCs/Kis are concluded to be non-significant in the EIS. YNLR questions this overly optimistic and statistically unlikely prediction. For example, the sheer number of fish and wildlife species that the few selected VC/Kis represent would suggest that some will be adversely affected, even if by chance alone. The assessment effectively states that the Project is advantageous and/or neutral to all biophysical and human values, which YNLR rejects. If the Project proceeds, YNLR will want to be closely associated with all project monitoring programs. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** The draft EIS carefully evaluated the residual adverse effects remaining on VCs and KIs following implementation of mitigation measures. The EIS conservatively identifies where change from existing conditions are expected for each VC or KI, and assesses this change (i.e., the residual effect) for significance. For instance, the wildlife and avian assessments concluded that the residual effects of the Project are not expected to result in a change to the viability and persistence of the VCs and associated KIs and were, therefore, predicted to be not significant. As the review comment correctly notes residual effects identified in the EIS were deemed to be not significant - that is, the level of effect (change) did not meet the threshold of significance as defined for the VC. The EIS also discusses the certainty (and uncertainty) of the conclusions drawn by the assessment. Each VC or KI is evaluated independently and based on specific Project-environment interactions and VC-specific mitigations. Denison is confident that the conclusions drawn in the EIS with respect to potential effects and their significance are supported by the analysis presented. Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.

			YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024) YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 418. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
419	YNLRO (March 4, 2023)	Appendix 16-A Summary of Cumulative Effects	**YNLR Comment March 4, 2023** Comment #91, Appendix A: There are about three dozen Valued Component/Key Indicators that are assessed for the significance of cumulative effects (effects that remain after mitigation) from the Project. These include air quality, noise, terrain morphology and stability, groundwater quantity and quality, surface water quality and quantity, soil quantity and quality, organic matter, sediment quality, benthic invertebrates, fish and fish habitat, fish health, vegetation abundance, listed plant species, wetlands, moose, furbearers, woodland caribou, raptors, migratory breeding birds, avian species at risk, human health, Indigenous land and resource use, other land and resource use, heritage resources, traditional diet, income of workers, community cohesion, traffic, community infrastructure and services, and economics. As with the summary of the residual effects, the cumulative effects of the Project on all of these VCs/Kis are concluded to be non-significant in the EIS. Again, YNLR believes this to be an overly optimistic and statistically unlikely prediction for the same reasons as given above, for example, inadequate spatial boundaries, poorly chosen and grouped VCs and Kis, the apparent omission of the existing linear disturbance network in the effects assessments, and the largely qualitative nature of the assessments and their resultant 'significance.' **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Please refer to the response to YNRL comments #418. Additionally, Denison notes that there are a number of review comments that have a similar theme. Rather than repeating the same narrative in this table Denison has developed an inclusive technical memo to provide a more coherent and complete response, the Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments. See attached. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 419. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
420	YNLRO (March 4, 2023)	Executive Summary Monitoring and Follow-Up Programs	**YNLR Comment March 4, 2023** Comment #92, Appendix A: YNLR believes there is a lot of uncertainty remaining from this EIS. This stems from several items, including the relatively novel nature of the ISR methodology with its potential effects on water quality and fish health, to the questionable conclusion that the mine will be neutral with respect to the persistence of woodland caribou in the region. If the mine is to be approved, YNLR wants a transparent, independent, statistically robust monitoring program implemented for the life of the Project and beyond. YNLR expects northern Indigenous Peoples to be involved in the design and implementation of such a program. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.'	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Details of follow-up and monitoring plans will be prepared in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies. YNLR will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries are sufficiently extensive to measure EIS predictions. Additionally, Denison has identified key objectives respecting Indigenous engagement associated with the Project: • Build and maintain authentic relationships based on a foundation of trust, good faith, and transparency. • Create a respectful dialogue process that promotes communication and collaboration among Denison and Indigenous communities, in a timely and accurate fashion. • Understand how the proposed development of the Project may affect the interests of Indigenous peoples (including Indigenous and/or Treaty Rights), and work with Indigenous

			YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	peoples to avoid, mitigate, or otherwise address effects, while also collaborating to maximize potential positive effects. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 420. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
421	YNLRO (March 4, 2023)	General	**YNLR Comment March 4, 2023** Comment #1, Appendix B: There is inconsistent use of YNLRO and YNLR throughout several sections of the EIS. Specifically, YNLRO in section 3, YNLR in sections 4 and 11. As they are used to represent the same thing, only one format should be used. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Editorial issue with inconsistent abbreviations for Ya'thi Néné Land and Resource Office will be corrected in the final EIS and 'YNLR' will be used. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 421. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
422	YNLRO (March 4, 2023)	Section 1.0 Project Introduction and Overview, p. 1-5 Section 3.0 Value of IK in EA Practice, p. 3-1 and 3-2	**YNLR Comment March 4, 2023** Comment # 2 and 6, Appendix B: EIS Page 1-1, second paragraph, first sentence states: "*The Project falls within the boundaries of Treaty 10, the Nuhtsiye-kwi Benéne (Ancestral Lands) of English River First Nation, the traditional territory of the Kineepik Métis Local #9, the homeland of the Métis, and the Nuhenéné.*" YNLR notes that this is a misuse of Nuhenéné as the name of the people. This should be "*Nuhenéné, the traditional territory of the Athabasca Denesųtiné*". In reference to section 3.1 of the EIS (p. 3-1 to 3-2), YNLR also notes that the Wheeler River Project falls within Nuhenéné and Athabasca Denesųtiné perspectives and knowledge should have been sought throughout all stages of the Environmental Assessment (EA). Early inclusion in this project would have been beneficial to both the Athabasca Denesųtine communities and to Denison through increased sharing of knowledge. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** At first instance of 'Nuhenéné' Denison will recognize: 'Nuhenéné, the traditional territory of the Athabasca Denesųtiné.' **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 422. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

423	YNLRO (March 4, 2023)	Section 1.0 Project Introduction and Overview, p. 1-5 and 4-12	**YNLR Comment March 4, 2023** Comment #3, Appendix B: There YNLR notes that the Hatchet Lake Denesųłiné First Nation, an Athabasca Denesųłiné community, is the closest to the Project. The Wheeler River EIS seems to rely on road distance rather than physical proximity. Road distance should not be utilized to determine community importance or impacts since not all travel methods require continuous roads. Travel to this part of our traditional territory is typically achieved cross country rather than by road. Comment #13, Appendix B: YNLR notes that Hatchet Lake First Nation is located 150 km...Black Lake First Nation is located 180 km...and Fond du Lac First Nation is located 230 km away from the Project as recognised on page 4-47 of the draft EIS. Our community members generally access the Project area via overland routes rather than the established Provincial Road network. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Thank you for the information. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 423. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
424	YNLRO (March 4, 2023)	Section 1.0 Project Introduction and Overview, p. 1-4 and 1-7	**YNLR Comment March 4, 2023** Comment #4 and 5, Appendix B: Athabasca Denesųłiné land uses include, but are not limited to, large and small game harvesting, gathering activities, and fishing, all of which are of key cultural importance. It is important to note that the Hatchet Lake Denesųłiné First Nation and the community of Wollaston Post are situated at Wollaston Lake and given their downstream location there is potential for negative impacts. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Potential effects from the Project on surface water quality were comprehensively assessed in Section 8.2 of the draft EIS. The assessment evaluated discharge of treated effluent from the site using predictive modeling. Water treatment will be conducted in the onsite Industrial Waste Water Treatment Plant (IWWTP) and treated effluent will be tested prior to release to Whitefish Lake. Treated effluent that does not meet the effluent discharge criteria in the provincial approval to operate or effluent criteria defined in the Metal and Diamond Mining Effluent Regulations will not be released to Whitefish Lake and will be recirculated to the process water pond for eventual re-treatment in the IWWTP. In the draft EIS, Section 8.2 the predictive modeling showed that constituent concentrations including radionuclides would be below water quality objectives for the protection of aquatic life (i.e., no effects would be expected) at the outlet of Whitefish Lake. The outlet of Whitefish Lake is well upstream of the inflow of Icelander River to Russell Lake. Since no effects on surface water quality are expected to occur in the lake closest to the Project, no effects would accrue in areas further downstream in the watershed, where contributing sub watersheds are many, many-times the size of the sub watersheds near the Project site. As such, there will be no effects on surface water quality in Wollaston Lake from the Project activities. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 424. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

425	YNLRO (March 4, 2023)	Section 3.0 Value of IK in EA Practice, p. 3-5	**YNLR Comment March 4, 2023** Comment #7, Appendix B: YNLR notes that while the wording for EIS Page 3-5, first paragraph, is an improvement from the May 2021 draft, it does not make clear that no Wheeler River site specific Athabasca Denesųłiné knowledge or land use studies were undertaken and that the information presented is from a variety of other projects with differing objectives and study areas. The issue is better captured/described in the EIS on page 11-39. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Acknowledged, updated language will be included in the EIS. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 425. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
426	YNLRO (March 4, 2023)	Section 3.0 Value of IK in EA Practice, p. 3-10	**YNLR Comment March 4, 2023** Comment #8, Appendix B: YNLR notes that there appears to be grammatical errors for page 3-10, last paragraph of the EIS. YNLR requests edits to: "Ya'thi Néné Lands and Resources, the point of contact for and representative of the Athabasca Denesųłiné communities of Black Lake, Fond du Lac, and Hatchet Lake Denesųłiné First Nations, as well as the northern hamlets/settlements of Stony Rapids, Wollaston Lake, Uranium City, and Camsell Portage, provided their report; An Exploration of Recorded Athabasca Denesųłine Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of Denison Mines Wheeler River Project, that summarized traditional knowledge and land use and occupancy information collected for various other projects and initiatives and partially documented Athabasca Denesųłiné use in the Project area, although it is not considered as a site-specific study." **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Acknowledged, edit will be made to the EIS. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 426. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
427	YNLRO (March 4, 2023)	Section 3.0 Value of IK in EA Practice, various pages	**YNLR Comment March 4, 2023** Comment #9, 10, 12, 15, 16, 17, 19 and 35, Appendix B: YNLR notes that as the Athabasca Denesųłiné were not considered to be an Indigenous COI, the opportunities to contribute to our knowledge to this discussion were diminished or lost. Comment #19, Appendix B: The mis-categorization as the Athabasca Denesųłine am Indigenous Community rather than as an Indigenous COI is a step backwards rather than forwards with regards to reconciliation. A letter to Denison dated July 29, 2022, YNLR critiqued the designations of COI and IC as being artificial and marginalizing. Denison responded October 28, 2022, after the submission of Wheeler River EIS with an alternative view. Other related comments include: - Comment #9, Appendix B: Only 4 of 31 aspects influenced (from EIS Table 3.5-1) for Indigenous knowledge and 3 of 37 aspects influenced (from EIS Table 3.5-2) for local knowledge were taken from Athabasca Denesųłine knowledge sources. How will Denison address this? - Comment #10, Appendix B: YNLR notes that the Athabasca Denesųłiné communities should be considered an Indigenous COI per Denison's definition (EIS page 4-vii) as they are/have: o signatories of Treaty 10 and Athabasca Denesųłine traditional territory is within the Project	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison's approach to identifying Indigenous COIs considered several factors as identified in Section 4.3.1 of the EIS. Being signatories of Treaty 10 was among, but not the sole applicable criteria, and not all Treaty 10 communities are considered as Indigenous COIs for the Project. Through continued and focussed engagement with the YNLR since the YNLR identified its interest in the Project in 2019, Denison has come to better understand the Athabasca Denesųłiné communities' relationship to the Project site and current use of the areas for traditional purposes. Denison acknowledges that the Hatchet Lake Denesųłiné First Nation has the potential for established Indigenous and Treaty Rights proximal to the Project. The Hatchet Lake Denesųłiné First Nation, as represented by the YNLR will be identified as an Indigenous COI in the revised draft EIS. With respect to Denison's consideration of Indigenous Knowledge shared by the Athabasca Denesųłiné knowledge sources, Denison notes that Tables 3.5-1 will be updated to better reflect where the YNLR's An Exploration of Recorded Athabasca Denesųłiné Traditional Knowledge, Land Use and Occupancy Information in the Vicinity of the Denison Mines Wheeler River Project, which was included as an Appendix to the EIS, was considered and included as Table 3.5-1 does not reflect all instances the report was utilized. With respect to Table 3.5-2, only a limited number of data sources were considered and labelled as Local Knowledge - which

			area (Hatchet Lake First Nation is a signatory to Treaty 10 as recognised on page 4-47 of the draft EIS) o established Treaty rights in proximity to the Project o more likely to experience impacts, for example, water drainage as indicated on page 1-7 of the EIS ultimately flows into Wollaston Lake where the Athabasca Denesųłine community of Hatchet Lake is located - Comment #12 and 16, Appendix B: YNLR notes that the Project is located within Nuhenéné (the Athabasca Denesųłiné traditional territory) as recognised on page 4-61 of the draft EIS. Further, Hatchet Lake First Nation is a signatory to Treaty 10, while Black Lake First Nation and Fond du Lac First Nation are signatories to Treaty 8, and as such all have Treaty Rights within the Project area and that ; that our communities are in proximity to the Project and have demonstrated traditional activity - Comment #15, Appendix B: YNLR notes that the Athabasca Denesųłine has relationships with other projects such as McArthur River and Key Lake as indicated in ROC-78, page 504, Combined Appendices for the Wheeler River Project Draft EIS. - Comment #17, Appendix B: Given these EIS defined criteria, YNLR has difficulty understanding why the Athabasca Denesųłiné have been excluded from Indigenous COI status for this project. Exclusion of COI status means loss of opportunity for the communities to be part of greater engagement throughout all stages of the Project. Lost opportunities are considerable and include loss of participation at all phases of the Project and include influence regarding the boundaries of the study areas, possibilities for increased discussions regarding environmental and health concerns, mitigation procedures, and planned remediation, potential to participate in monitoring and research projects and future opportunities such as employment. - Comment # 35, Appendix B: YNLR notes that the engagement database demonstrates that their opportunities to contribute were limited. For example, of the approximately 101 pages of Engagement Database tables that are dispersed through several sections of the appendices for the EIS (2022), there are 6 entries credited to the Athabasca Denesųłiné. Given an average of 3 to 5 entries per page in the tables, this means that only 1-2% of the contributions were made by the Athabasca Denesųłiné. These limited opportunities may well be the result of the exclusion of Athabasca Denesųłine from the COI category. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table] **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	is representative of information collected outside of a community-led IK process, key person interviews, or engagement events. As such, there may be limited examples in which knowledge shared constituted local knowledge, and may have been considered as either IK or engagement outcomes. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 427. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
428	YNLRO (March 4, 2023)	Section 4.0 Engagement, p. 4-14, 4-61	**YNLR Comment March 4, 2023** Comment #20 and 22, Appendix B: YNLR note that project is within Nuhenéné. There is no need to state the southern edge. It could be argued that the Project is on the northern edge of other Indigenous groups areas. Such descriptions have been applied inconsistently to the groups. Territories should be described in an unbiased manner. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Noted, EIS will be updated accordingly. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 428. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November

				2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
429	YNLRO (March 4, 2023)	Section 4.0 Engagement, p. 4-61	**YNLR Comment March 4, 2023** Comment #23, Appendix B: YNLR notes that the EIS text on page 4-61 should recognise that this report was a compilation of existing YNLR data from a variety of projects with differing objectives and study areas, and that no research was commissioned. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Noted, EIS will be updated accordingly. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 429. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
430	YNLRO (March 4, 2023)	Section 4 Engagement, p. 4-65	**YNLR Comment March 4, 2023** Comment #24, Appendix B: YNLR believes that the EIS section on page 4-65 referring to the letter sent by Denison dated October 28, 2022 rather than in early October as stated in the draft EIS. Given the draft EIS was submitted to the CNSC on October 24, 2022, four days before Denison responded to YNLR concerns, further opportunity to provide clarifications or specific details for inclusion in the EIS were lost. YNLR does not agree that all our concerns have been addressed in the EIS. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison understands the EIS involves an iterative process and Denison will continue to engage with YNLR at their direction. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 430. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
431	YNLRO (March 4, 2023)	Section 11 Land and Resource Use, p. 11-8	**YNLR Comment March 4, 2023** Comment #26, Appendix B: YNLR notes that the Athabasca Denesųłiné had limited opportunity to contribute to VCs. One community virtual meeting was presented to the Athabasca Denesųłine, while there appears to have been approximately 12 events for other First Nation communities (combined) including workshops, school presentations, meetings (in person and virtual) and open houses (draft EIS pp 4-16 to 4-86). While YNLR appreciate the opportunity to participate and recognize the impacts of Covid-19, the difference between Athabasca Denesųłine participation and other groups is stark. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** In March 2019, Denison was notified by the YNLR that the Indigenous communities within the local Athabasca communities identified were interested in the Project and that YNLR held the Duty to Consult from these communities. Since receiving correspondence from the YNLR office in 2019 Denison has been collaboratively working with the YNLR office in a mutually agreed upon manner and will continue to do so. Denison understands the EIS involves an iterative process and Denison will continue to engage with YNLR at their direction. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised.

			YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024) YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 431. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
432	YNLRO (March 4, 2023)	Section 11 Land and Resource Use, p. 11-14	**YNLR Comment March 4, 2023** Comment #27, Appendix B: YNLR notes that the Athabasca Denesųłiné have demonstrated land use in both the local and regional land use as per our report (YNLR 2022). YNLR has reported 371 Athabasca Denesųłine Traditional Land Use and Occupancy data entries within the Denison regional study area. These include 18 points for harvesting of big game, such as barren ground caribou, moose, and woodland caribou, 29 overnight sites, 21 points where birds or eggs such as duck and spruce grouse were harvested. Other activities include furbearer harvesting, fishing, including commercial and tourism related activities such as guiding. A map of these activities is reiterated here. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Thank you, noted. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 432. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
433	YNLRO (March 4, 2023)	Section 11 Land and Resource Use, p. 11-18, 11-40, 11-41, 11-94 and 11-95	**YNLR Comment March 4, 2023** Comment #28, 31 and 32, and 34 Appendix B: YNLR notes that Denison's understanding of the nature of the 2022 YNLR Report is incomplete. As YNLR noted many times, this report is an amalgamation of known information contained within YNLR's database. It comes from a variety of projects each with differing objectives and geographic scope. It is not a Wheeler River-specific Athabasca Denesųłiné Knowledge, Land Use, and Occupancy (ADKLUO) Study. This, in our opinion, leads to misunderstandings and misrepresentations within the draft EIS. Additional clarifications are that our report is not a Wheeler River-specific TLU study, nor were any such specific works undertaken or commissioned. This is important because it sets the tone for comparisons with other Indigenous groups who have met with Denison far more frequently and conducted far more intensive and focused works. Additionally, the limited engagement with did not allow for a shared Athabasca Denesųłine – Denison in- depth exploration of Athabasca Denesųłiné experiences. Using the YNLR Report requires an understanding that the amalgamated information comes from a variety of projects and was collected for a variety of purposes. For example, the report mentions woodland caribou values, tracks, and sightings within the EIS study area. This information comes from various caribou studies and our database records project information. This information clearly demonstrates that Athabasca Denesųłine members were in the EIS area, that harvesting or other values were not recorded is a function of the purpose of the woodland caribou study rather than an indication that Athabasca Denesųłine do not utilize the area for other traditional purposes. Other such interpretations or misrepresentations exist within the report. Additional engagement with the Athabasca Denesųłiné communities and YNLR could have ensured further clarification. Information from the 2022 YNLR Report Section 3.3 appears to have been disregarded in the draft EIS. This information includes references to activities mentioned during duty-to- consult works for other projects with the LSA. This includes hunting, fishing (including commercial) and the gathering of berries and medicines. The responses also indicate that the land is used for	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Section 11.1.2.4 of the EIS will be updated to reflect the fact that the YNLR's report is an amalgamation of known information from YNLR's database and was not collected explicitly for the purposes of the Project, and as such, should be interpreted by the reader with caution. Section 3.3 of the YNLR's report notes that the comments shared are not geo-located. Without having the locations disclosed, information may have been excluded from Section 11.0 as there was no way to confirm whether those activities overlapped with the spatial boundaries under consideration for potential effects to Indigenous Land and Resources Use. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 433. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

			therapeutic purposes, youth gatherings, fish camps and general camping. Further the responses note that areas were utilized year-round for hunting, trapping, and fishing, with activities such as berry picking occurring in summer. Impact concerns raised by the interviewees in included damage to the lands and water, how wildlife will be affected, disruption to traditional activities and accessibility to the areas while projects are ongoing. Surely, this information is relevant to the Wheeler River project and should be included with the EIS? YNLR also indicated to Denison in July 2022 that some of the publicly available information is the draft EIS was misleading and of limited relevance to this project. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	
434	YNLRO (March 4, 2023)	Section 11 Land and Resource Use, p. 11-37	**YNLR Comment March 4, 2023** Comment #29, Appendix B: YNLR notes that the Map of BQ Caribou Range in draft EIS Section 11.1.3.3.26 is misdated, it should be BQCMB 2012. The original source map is dated 2000, but includes telemetry data from 2012 so is more appropriately dated as 2012. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Noted, the map included in Section 11.1.3.2.6 (Figure 11.1-5) will be updated to reflect the appropriate date. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 434. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
435	YNLRO (March 4, 2023)	Section 11 Land and Resource Use, p. 11-40	**YNLR Comment March 4, 2023** Comment #30, Appendix B: YNLR notes, as they did previously, that they are unclear what the relevance of including these sources is, since neither the CBEMP nor the Tazi Twé project investigated land use in the Wheeler River area. The March 2022 YNLR compilation report provides clear indications that the Athabasca Denesųłine communities 150tilize the areas in the vicinity of the Project. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Noted, Denison provided publicly available information on the Community Based Environmental Monitoring Program and the socio-economic baseline assessment for the Tazi Twé Hydroelectric Project EIS to provide context on recorded harvests in locations close to communities and distant from the Project. Section 11.1.3 further provides context from the YNLR 2022 report and their recorded land use in the vicinity of the Project. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 435. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

436	YNLRO (March 4, 2023)	Section 11 Land and Resource Use, p. 11-40	**YNLR Comment March 4, 2023** Comment #31, Appendix B: YNLR notes that the citations on the EIS page 11-40 are listed as YNLR 2020 and should likely be 2022. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Noted, the EIS will be updated. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 436. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
437	YNLRO (March 4, 2023)	Section 11 Land and Resource Use	**YNLR Comment March 4, 2023** Comment # 33, Appendix B: Pages 11-94 and 11-95 of the EIS uses the term *historic*. YNLR notes that the use of the term historic is prejudicial and incorrect. YNLR were assured by Denison that they had removed the term historic during earlier discussions. **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison has verified that the term 'historic' is not included or referenced on pages 11-94 or 11-95 of the EIS. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 437. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.
438	YNLRO (March 4, 2023)	Section 11 Land and Resource Use	**YNLR Comment March 4, 2023** Comment #36, Appendix B, EIS Page 11-100 third- and fourth-lines states “The YNLR described trapping activity by one of its Athabasca Denesųłiné member at Keefe Lake to the east of the RSA but did nor report any trapping in N-14 (YNLR 2022).”YNLR notes that the reference to trapping in N-14 is perplexing as the Saskatchewan Trappers Association map shows that N-14 is south of the Project area. Further there is a typo: “not” instead of “nor” **YNLR Comment March 13, 2024 (Response to Denison Comment November 22, 2023)** No further response provided by YNLR. **YNLR Comment June 19, 2024 (Response to Denison Comment on April 05, 2024)** YNLR Response: YNLR does not know what Denison means by the phrase 'deemed complete.' YNLR's responses in their letters of 02 February 2024 and 13 March 2024 remain unchanged and YNLR's concerns in those responses remains unaddressed.	**Denison Response November 22, 2023 (Response to YNLR Comment March 4, 2023)** Denison will revise the EIS to correct the typo. **Denison Response April 05, 2024 (Response to YNLR Comment March 13, 2024)** No further response from YNLR. Denison will proceed on the basis that the comment is deemed acceptable and complete by YNLR, unless otherwise advised. **Denison Response June 28, 2024 (Response to YNLR Comment June 19, 2024)** There have been no further comments from the YNLR on EIS reference no. 438. As such, Denson assumes that its responses provided November 2023 are satisfactory and are therefore deemed complete. YNLR responded indicating that the YNLR's comments in letter dated February 02, 2024 and March 13, 2024 remain unchanged and unaddressed. Denison has provided a comprehensive response to each of YNLR's comments in kind and has sought to address YNLR's concerns. Denison has stated its commitment to work with the YNLR and to collaboratively develop monitoring plans. Denison remains committed to engaging with the YNLR on these concerns. As the YNLR has provided no further comments to Denison's responses November 2023, Denison is unclear on how to address the comments in a way that is satisfactory for the YNLR.

439	Métis Nation of Saskatchewan (MN-S) (March 4, 2023)	Executive Summary, Section 2 Project Overview EIS, Section 4.3.4.1 Engagement with Indigenous Organizations	Issue #ES-001: To date, Denison's engagement approach has not been collaborative. Denison has not engaged all potentially impacted Métis communities. Denison has focused engagement efforts on Métis communities in NR3. Recommendations: - Denison needs to engage all potentially impacted Métis communities. Specifically, to see Denison equally engage NR1 Locals and NR3 Locals in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest - Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment, procurement, and cultural opportunities, engagement expectations (e.g., involvement of youth and Elders), and approach for gathering and incorporating Métis Knowledge into Project reports, plans, and processes.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. Denison has updated the revised draft EIS executive summary to acknowledge that the Project falls within the MN-S Homeland, including the unique situation that the MN-S have in the area. 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.
440	MN-S (March 4, 2023)	Executive Summary, Section 3 Project Setting Executive Summary, Section 3.4.3 Proposed Schedule and Activities Executive Summary, Section 4 General EIS, Glossary	Issue #ES-002: Denison does not acknowledge that the Project falls within the MN-S Homeland. Issue #ES-013: MN-S is listed under Indigenous Organizations instead of Indigenous Communities of Interest. Issue #ES-012, ES-005 and 4-001: Per Denison's definition, MN-S, NR1 Locals, and NR3 Locals should be considered an Indigenous Community of Interest. Denison notes site visits as the only engagement-associated activities in each Project Phase. Additional involvement opportunities should be provided to MN-S throughout the life of the Project Further, MNS refers to CNSC correspondence (Appendix A) indicating that consultation and engagement was expected to be with NR1 Locals, NR2 Locals, NR3 Locals, and MN-S. Given NR2's involvement in NexGen and Fission, MN-S limited its engagement and consultation expectations to NR1 Locals, NR3 Locals, and itself. Recommendations: - Denison needs to engage all potentially impacted Métis, including: MN-S, NR1 Locals, and NR3 Locals, in addition to Kineepik Metis Local #9, as an Indigenous Community of Interest throughout the life of the Project. - Denison needs to revise their Indigenous Community of Interest definition in the Final EIS to reflect the uniqueness of Métis governance structures. Specifically, a definition that recognizes Métis Locals proximate to the Project, MN-S, and MN-S regional leadership. - Denison needs to engage MN-S, NR1 Locals, and NR3 Locals, to understand their preferred level of involvement throughout the life of the Project. - Denison needs to acknowledge MN-S, NR1 Locals, and NR3 Locals as an Indigenous Community of Interest in the Final EIS. - Denison needs to revise the Final EIS Executive Summary to note that the Project falls within the Homeland of MN-S, NR1 Locals, and NR3 Locals. Denison needs to apply this change throughout the EIS, where applicable. - Denison to acknowledge that lease review data is not an appropriate way to determine Métis traditional resource use in and around the Project in the Final EIS. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. Denison has updated the revised draft EIS executive summary to acknowledge that the Project falls within the MN-S Homeland, including the unique situation that the MN-S have in the area. 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.
441	MN-S (March 4, 2023)	Executive Summary, Section 3.4.2.4 Waste Management	Issue #ES-004: Denison's EIS does not outline where hazardous waste will be taken for proper recycling or disposal. Recommendations: - Denison needs to share where hazardous waste will be taken for proper recycling and disposal with MN-S, NR1 Locals, and NR3 Locals	Waste management is described in Section 2.2.4 of the Draft EIS and includes discussion of all waste types that will be generated by Project-related activities. The following is noted in Section 2.2.4 for reference, "Conventional waste, radiologically contaminated waste, and hazardous waste will be managed at the Project. 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. A waste management program will be developed for the Project to support licensing and permitting. The waste management program and associated plans developed to support licensing will be based on the 4 R's: Reduce, Reuse, Recycle, and Recover, and will detail how each type of waste generated on site will be managed. Resources used to develop the waste management program will include, but are not limited to, the CNSC's REGDOC-2.11 series, related Canadian Standards Association (CSA) standards, and the Hazardous Substances and

				Waste Dangerous Goods Regulations (Government of Saskatchewan 2000)." Hazardous waste management in particular discussed in Section 2.2.4.4. of the Draft EIS where the following is noted, "Denison identified a need to have a small (250 m2) pad designated for temporary storage of hazardous waste such as paints, solvents, hydrocarbons, and used oil. The temporary storage pad will have a composite liner system (Figure 2.2 24). Hazardous wastes will be taken off site by waste management service providers for proper recycling as soon as practical." As referenced in the Draft EIS, 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.
442	MN-S (March 4, 2023)	Executive Summary, Section 3.4.8 Indigenous Knowledge	Issue #ES-003 and ES-007: Denison did not engage MN-S on potential Project-related effects to Métis traditional use activities (such as but not limited to: hunting, trapping, and fishing) and therefore may not be aware of potential traditional use activities conducted by Métis peoples in and around the Project. Denison's reliance on reviewing traditional resource user leases is not an appropriate way to determine Métis traditional resource use in and around the Project. Recommendations: - Denison needs to incorporate Métis Knowledge from the Métis Knowledge Study (MKS) into their discipline-specific effects assessment, the Final EIS, and all monitoring plans for the Project, where applicable. - Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to determine the appropriate funding, process, and timeline to conduct the MKS.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. Denison has updated the revised draft EIS executive summary to acknowledge that the Project falls within the MN-S Homeland, including the unique situation that the MN-S have in the area. 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.
443	MN-S (March 4, 2023)	Executive Summary, Section 4.1 Introduction	Issue #ES-009: MN-S has not had an opportunity to review Denison's engagement plan. Recommendations: - Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment.	Since being advised by the MN-S in October 2019 that a number of Métis Locals had delegated to the MN-S the Duty to Consult for the Project, Denison has been engaged in extensive ongoing discussions with the MN-S with the goal of reaching agreement regarding the EA process and MN-S' participation in it. Denison continues to engage with the MN-S, inclusive of engagement in NR1 and NR3, at their direction and there is no formal engagement plan, as such Denison does not feel there is a need for MN-S review as continued engagement is informed by and at the direction of the MN-S in an ongoing manner. For example, In recognition of the MN-S potential interests in the Project, Denison and MN-S have negotiated a capacity funding agreement. This agreement outlines a mutually agreeable framework and applicable funding arrangements to facilitate the MN-S' participation and engagement in the EA process for the Project. The parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings.
444	MN-S (March 4, 2023)	Executive Summary, Section 4.1 Introduction Executive Summary, Section 4.2 Engagement Approach EIS, Section 2.2.1 Mining EIS, Section 4.3.1 Engagement with Identified Indigenous Communities and	Issue #ES-008 and ES-010: Denison has not engaged all potentially impacted Métis communities. Issue #4-006: Métis communities in NR1 and NR3 meet multiple evaluation criteria identified by Denison. Denison's engagement to date has not included Métis communities in NR1. Denison's explanation related to the selection of Indigenous groups to be engaged on the Project is unsatisfactory. Issue #4-007: The Project is located within Métis NR1 in Saskatchewan. However, several key Métis communities with whom Denison is engaging are located in Métis NR3. Denison's explanation related to the selection of Indigenous groups to be engaged on the Project is unsatisfactory. The MN-S website states that "consultations must be with the Métis government structures that are elected and supported by the Métis people." (MN-S n.d.c.)". Denison has not engaged with Métis communities outside of NR3.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. Denison has updated the revised draft EIS executive summary to acknowledge that the Project falls within the MN-S Homeland, including the unique situation that the MN-S have in the area. 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

		Organizations, and Supporting Criteria EIS, Section 4.3.2.1.3 Key Engagement Activities EIS, Section 4.3.4 Engagement with Indigenous Organizations	Issue #ES-011: Denison's engagement to date has largely been with Métis communities in NR3. Particularly, the Kineepik Metis Local #9 community. There are only two entries related to engagement with Métis communities (with exclusion to Kineepik Metis Local #9) in Appendix 2A: Section 2 – Engagement Database Summary Table – Project Description. Kineepik Metis Local #9. This record demonstrates little engagement was conducted with Métis communities in NR1 and NR3. Issue #2-001 and 4-008: Denison has not had meetings to introduce the Project, share information on Project alternatives and options, VCs, the ISR ming method and proposed freezing method, or any other topics of interest to the MN-S and Métis communities in NR1. These communities also did not receive a VC survey to identify VCs of importance to Citizens and/or other interests and concerns related to the Project. Recommendations: - Denison needs to engage all potentially impacted Métis communities. Specifically, to equally engage all NR1 and NR3 communities, in addition to Kineepik Metis Local #9 throughout the life of the Project. Denison needs to include MN-S, NR1 Locals, and NR3 Locals under Indigenous Communities of Interest. - To facilitate a collaborative approach to engagement, Denison needs to engage MN-S, NR1 Locals, and NR3 Locals on Project information, Project-related employment/procurement/cultural opportunities, engagement expectations (e.g., involvement of youth and Elders), and approach for gathering and incorporating Métis Knowledge into Project reports, plans, and processes.	24, 2023. Denison has updated the revised draft EIS to include relevant information in the assessment from the Métis Knowledge Study.
445	MN-S (March 4, 2023)	Executive Summary, Section 5 General	Issue #ES-014: Denison did not engage MN-S on potential Project-related effects to Métis traditional use activities such as (but not limited to): hunting, trapping, and fishing. No Métis Knowledge was used to inform the Project's spatial boundaries. Issues #ES-015 to ES-24: Denison has not engaged MN-S to understand Métis knowledge to inform the development of the Project's environmental monitoring and management plans (e.g., Caribou Management Plan). This applies to monitoring air emissions, noise monitoring, geology, groundwater quantity and quality, surface water quality, sediment quality, fish and fish habitat and human health. Information to be gathered during the Métis Knowledge Study will contribute to the development of these plans. Recommendations: - Denison needs to incorporate Métis Knowledge from the MKS into their discipline- specific effects assessment, the Final EIS, and all monitoring and management plans for the Project, where applicable. - Denison needs to engage MN-S to determine the appropriate funding, process, and timeline to conduct the MKS. - MN-S would like the opportunity to review applicable Project management documents that provide information that is relative to the potential impacts of the Project on traditional land use activities, these include, but are not limited to the following: Preliminary Decommissioning Plan, Status of the Environment reports, Environmental Effects Monitoring reports, annual reports, updated environmental risk assessments and the Final Decommissioning. - Denison needs to provide plain language summaries, posters/handouts, and presentations on monitoring and effects management plans and programs to MN-S, NR1 Locals, and NR3 Locals. Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for review and comment. - Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to better understand how they would like to be informed of monitoring results (e.g., 1-page plain language summaries, annual monitoring report, community meetings etc.).	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
446	MN-S (March 4, 2023)	Executive Summary, Section 5.4.2 Surface Water Quality	Issue #ES-20: The draft EIS does not clarify the influence of groundwater temperature on Whitefish Lake. Recommendations: - Denison needs to confirm the influence of groundwater temperature on Whitefish Lake in the Final EIS.	There is no expectation of influence of groundwater temperature on Whitefish Lake during any phase of the Project. Groundwater would be expected to enter (discharge) to Whitefish Lake at its typical ambient temperature.

447	MN-S (March 4, 2023)	Section 2.2.1.3.2 Freeze Wall Timeline	Issue #2-002: The removal of the freeze wall may cause increased migration of constituents that could cause environmental release to the receiving environment unintentionally. Recommendations: Denison needs to clarify the following with MN-S, NR1 Locals, and NR3 Locals: a) the freezing effects on the Upper and Lower barrier zones post mining, and b) if the freeze thaw process could cause increased fracturing potential within these zones.	A separate technical memo including information related to freeze wall integrity and the basis for design of the freeze wall, which relies on site field data and lived experience from several exiting Saskatchewan mining operations, is provided as Attachment IR-10.
448	MN-S (March 4, 2023)	Section 2.3.4 Post-decommissioning	Issue #2-002: Denison does not acknowledge MN-S, NR1, or NR3 involvement in the design and implementation of the post-decommissioning monitoring program. Recommendations: Denison needs to engage MN-S, NR1 Locals, and NR3 Locals in the design and implementation of decommissioning planning and all subsequent monitoring programs for the Project. This will allow Métis to share their interests in the long-term state of the land and incorporate Métis knowledge. It will also create opportunities for Métis youth and Elders to participate in monitoring programs.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
449	MN-S (March 4, 2023)	Section 2.3.5 Ancillary Projects	Issue #2-004: Denison's EIS suggests SaskPower's work related to the extension of an existing 138 kV line will be independent from work led by Denison. Recommendations: - Denison needs to clarify whether the additional 138 kV line was factored into the cumulative effects evaluation. - Denison needs to clarify whether the proposed Project can proceed without the 138 kV line construction. - Denison needs to clarify the timing of the construction of the line and Wheeler River Project construction. - Denison needs to confirm that SaskPower will engage with MN-S, NR1 Locals, and NR3 Locals on line routing and design. - Denison needs to confirm if/when the 138 kV line will be decommissioned.	The Wheeler River Project includes a power line as an ancillary component. Denison evaluated the impact of the electrical infrastructure as part of the overall mine project. In the cumulative assessment, both the mine and its ancillary components were considered together, and cumulatively with other reasonably foreseeable projects. SaskPower will build, own, and operate the transmission line, and is responsible for separate permitting and engagement for their part of the project. SaskPower is also responsible for scheduling construction and decommissioning of the line and related communication.
450	MN-S (March 4, 2023)	Section 2.7 Project Benefits	Issue #2-005: Denison notes some jobs will require a Grade 12 education in addition to in-house training programs, but does not offer to support Métis peoples obtain Grade 12 education to access available positions. Recommendations: - MN-S would like confirmation on what kind of education and training support Denison will make available to maximize employment from Communities of Interest. - Denison needs to support Métis training opportunities through Northlands College. - MN-S would like additional details on which roles will need Grade 12, and how many roles are available for people without Grade 12.	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. All positions at the Project will require a Grade 12 education or equivalent. Section 13.3.2.1

				describes how foundational positions (i.e. entry level) require Grade 12 education and in-house training programs, although a combination of skills and experience may be considered. These positions would include process plant operators, site services, drillers, and catering/janitorial staff. Denison will update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.
451	MN-S (March 4, 2023)	Section 2.7 Project Benefits	Issue #2-006 and 2-007: Denison does not specify the goods and services during Construction, Operation, and Decommissioning. MN-S is interested in sharing potential goods and services opportunities for Métis peoples (e.g., chefs and artisans). Denison has not specified how it is transmitting knowledge nor provided an explanation of the procurement approach. Recommendations: - Denison needs to provide specific information on the goods and services opportunity available to Métis as per labour force and business analysis. - Denison needs to clarify how it has made MN-S, NR1, and NR3 Locals aware of the procurement approach and opportunities, and how it will keep them informed through the life of the Project.	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.
452	MN-S (March 4, 2023)	Section 2.9.1.3.1 Environmental Protection Program	Issue #2-008 and 2-009: The Draft EIS does not include a draft Environmental Protection Plan (EPP) or a summary of how the EPP will be developed. The Métis Knowledge Study is yet to be completed and these plans should not be completed without considering the Métis Knowledge Study. Draft monitoring plans were not available for review to confirm how Denison plans to inform plans with existing local and traditional knowledge. Recommendations: - Denison needs to provide an Environmental Protection Plan with the Final EIS. - Denison needs to involve MN-S, NR1 Locals, and NR3 Locals in the development and implementation of the Environmental Protection Program so that Métis can ensure their interests and Métis Knowledge are included. Additionally involvement in the development of monitoring plans and review of MN-S knowledge usage and how it informed the plan should also be undertaken. - Denison needs to share all engagement plans and reports of interest to MN-S, NR1 Locals, and NR3 Locals for input, review and comment. - Denison needs to include an implementation and reporting plan with the monitoring plans.	With respect to Part i) of the comment the following is noted. The MN-S review comments accurately indicates that a draft Environmental Protection Plan was not included in the EIS submission; rather, Section 2.9.1.3.1 of the draft EIS provides the commitment to develop an Environmental Protection Program (EPP) and associated plans. The EPP would be established to provide an overarching framework for key environmental monitoring and management plans and to ensure a means to demonstrate compliance with applicable environmental regulatory requirements and other performance targets. The EPP would be developed in a manner that aligns with the ISO 14001 EMS Standard. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. As such, the documentation referenced in the MN-S review comment will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S, and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate. With respect to Parts ii), iii) and iv) of the comment the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLRO are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. The Métis Knowledge Study was received by Denison on October 24, 2023, and Denison has integrated relevant information from the Study into the EIS accordingly.. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment. Additionally, and as noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive

				management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions.
453	MN-S (March 4, 2023)	Section 2.9.1.3.5 Emergency Preparedness and Response Program	Issue #2-010: No Emergency Preparedness and Response Program was available for review. Recommendations: - Denison needs to include an Emergency Preparedness and Response Program in the Final EIS for review. - Denison to include information on transportation accidents within the Emergency Preparedness and Response Program.	With respect to Part i) of the comment the following is noted. The MN-S review comments accurately indicates that a draft Emergency Preparedness and Response Program was not included in the EIS submission; rather, Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP). The EPRP would be established 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. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. A such, the documentation referenced in the MN-S review comment will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S, and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate. With respect to Part ii) of the comment the following is noted. The EPRP will include information relevant to transportation accidents and responses thereof. Further, information regarding aspects of emergency response with respect to transportation accidents was provided in the draft EIS and direction to that information is highlighted as follows for reference. Postulated traffic accident scenarios were considered in the Accidents and Malfunctions Technical Supporting Document (TSD; Appendix 14-A) as summarized in Section 14 of the draft EIS. As mitigation for such scenarios the accidents and malfunctions assessment highlighted commitments to develop the EPRP and several plan and procedure level documents (e.g., spill response plan; an emergency response plan; a traffic and transportation plan; a travel management plan; personnel training procedures). Additionally, Section 12.3 of the draft EIS discusses mitigation measures that will be implemented to reduce adverse traffic effects, as well as mitigation measures to be implemented to reduce adverse effects on emergency services capacity such as: • 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. • 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. • 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. • Denison will maintain Project roads and the main access road to the site. First aid facilities will be supplied during construction. • A primary care paramedic will be contracted to provide care on site through all phases of the Project. Denison will provide the appropriate amount of First Aid and CPR training to make sure employees have adequate coverage. • Mandatory safety orientations will be held for contractors and workers. • First aid personnel will provide transport to a hospital by air when required or by Saskatchewan's air ambulances; • Health and safety management programs will be developed for Construction, Operation, and Decommissioning. • Workers will be trained in fuel handling, equipment maintenance, and fire prevention and response measures. • Denison's Environment, Health, Safety, and Sustainability Policy will be enforced.

				• Continued liaison with LSA communities and relevant authorities (e.g., RCMP, health and service providers) will be undertaken to provide updates, discuss any Project-related concerns, and make sure that the required resources are in place. • Project-specific contingency, emergency response, and spill prevention plans will be developed to reduce the likelihood and severity of accidents and potential fires. • 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 specialty materials or equipment to deal with an emergency response.
454	MN-S (March 4, 2023)	Section 3.4.2.3 Métis Nation – Saskatchewan Section 3.4.8 Lands Taken Up from an Indigenous Perspective	Issue #3-001 and 3-002: The Draft EIS does not yet include Métis Knowledge from NR1 and NR 3 other than Kineepik. The Draft EIS does not include information on how Denison intends to include the outcome of the Métis Knowledge Study. Perspectives on cumulative impacts have only been considered for English River First Nation and Kineepik Metis. This has resulted in an absence of MN-S perspective regarding cumulative impacts within the Project and surrounding areas. Recommendations: - Denison needs to provide a clear indication of how the MKS findings were included in the Final EIS (e.g., effects analysis, cumulative effects analysis, mitigation measures, etc.) including confirming use with MN-S. - The Assessment should not be considered complete until the Métis Knowledge Study is finished and factored in.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLRO are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. The Métis Knowledge Study was received by Denison on October 24, 2023, and Denison has integrated relevant information from the Study into the EIS accordingly. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.
455	MN-S (March 4, 2023)	Section 3.4.6 Addressing Divergence Between Indigenous Knowledge and Western Scientific Knowledge Systems	Issue #3-003: Details are not provided regarding how these programs and plans will be developed and implemented, or how they will integrate the needs of all the Indigenous and Métis communities. Recommendations: - Denison needs to clarify whether discrepancies will only be addressed by follow-up and monitoring. - Denison needs to involve MN-S, NR1 and NR3 in determining other means for examining divergences and informing follow-up and monitoring (e.g., collaborative field studies).	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.
456	MN-S (March 4, 2023)	Section 4.1.2 Denison's Indigenous Peoples Policy and Investment and Sustainability Philosophy	Issue #4-002: The EIS notes that "In 2021, Denison announced the adoption of an Indigenous Peoples Policy (IPP). The IPP reflects Denison's recognition of the important role of Canadian business in the process of reconciliation with Indigenous peoples in Canada and outlines Denison's commitment to take action towards advancing reconciliation. The IPP was developed based on Denison's experiences with, as well as feedback and guidance received from, Indigenous communities with whom Denison is actively engaged. This approach was designed to make sure the IPP appropriately captures a mutual vision for reconciliation. The IPP identifies five key areas of action that will support the ongoing development of a continuously evolving Reconciliation Action Plan (RAP): Engagement; Empowerment; Environment; Employment; and Education. Through the RAP, Denison is striving to interweave the principles of reconciliation throughout all areas of the company's operations (Denison 2021a)." Denison does not explain how it will accomplish free, prior, and informed consent (FPIC) as per the IPP and RAP [2]. Recommendations: - Denison needs to clarify how it intends to consider free, prior, and informed consent (FPIC). [2] Engagement – We are committed to building long-term and mutually respectful relationships through proactive engagement and consultation with Indigenous people. Our aim is to work to achieve the free, prior, and informed consent, where the potential for impacts to rights may occur, before proceeding with economic development projects and during ongoing activities and operations	Denison's IPP is a principles based policy and addresses its vision for reconcile-action in all of Denison's activities. How the policy will be executed will vary on a project to project and community to community basis. The process includes a continually evolving Reconciliation Action Plan, that Denison will seek periodic input on from its Indigenous partners to ensure that it remains relevant to in the ongoing evolving landscape of reconciliation.

457	MN-S (March 4, 2023)	Section 4.2 Engagement Approach Section 4.3.1 Engagement with Identified Indigenous Communities and Organizations, and Supporting Criteria	Issue #4-003 and 4-005: MN-S is listed under Indigenous Organizations instead of Indigenous Communities of Interest. Not all potentially impacted Métis communities are listed in this figure. Métis communities listed under Indigenous Communities of Interest include Kineepik Metis Local #9, Sipishik Metis Local #37, Patuanak Metis Local #82. Métis communities listed under Other Indigenous Communities include Dore/Sled Lake Métis Local #67 and A La Baie Métis Local #21. These Métis communities are all within NR3. Only NR3 communities are listed in Figure 4.3-2: Unidentified Indigenous Communities and Organizations in Relation to the Project. Recommendations: - Denison needs to revise its understanding of Métis, Métis governance and the differences between MN-S and Métis Locals. - Denison needs to include MN-S, NR1 Locals, and NR3 Locals as Communities of Interest, or explain why they limited their selection of Métis communities in their listing.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
458	MN-S (March 4, 2023)	Section 4.2 Engagement Approach	Issue #4-003: MN-S appreciates Denison's willingness to evolve engagement activities in response to feedback from MN-S over time. Recommendations: - Denison to continue engaging and involving MN-S, NR1 Locals, and NR3 Locals during the revisions of the Draft EIS and completion of outstanding plans.	Noted, throughout the engagement, Denison has consistently affirmed its interest in MN-S participation and the incorporation of Métis knowledge into the EIS, in addition to the information and input that has already been gathered with KML.
459	MN-S (March 4, 2023)	Section 4.3.2.3 Engagement with Sipishik Métis Local #37	Issue #4-009: Denison is taking engagement direction from MN-S to not lump public engagement efforts with Métis engagement is appreciated. Recommendations: - Denison needs to engage Beauval/Sipishik Métis Local #37 throughout the life of the Project.	Noted, Denison will continue to engage with MN-S, including Beauval/Sipishik Métis Local #37, at their direction for the life for relevant stages of the Project.
460	MN-S (March 4, 2023)	Section 4.3.2.3.4 Key Issues and Concerns	Issue #4-010: The safety of all Métis peoples that will be engaged or employed by the Project is of utmost importance. Racism towards Métis peoples will not be tolerated. Denison's policies need to support a safe work culture for all. Recommendations: - Denison needs to share all policies related to creating a safe workplace with MN-S, NR1 Locals, and NR3 Locals for review and comment (e.g., health and safety policies and the Workplace Violence & Harassment Policy). - Denison needs to create a culturally safe workplace for Métis peoples. - Denison needs to clarify its policies to prevent incidents of workplace violence and harassment and identify clear actions to address potential incidents of workplace violence and harassment. - Denison needs to mandate cultural awareness training for all employees to help with one the Project's established principles: "approaching sustainability and engagement activities with the utmost respect for Indigenous communities, Indigenous Rights, and Indigenous Knowledge".	Denison has an established Workplace Violence and Harassment Policy and an Indigenous Peoples Policy, both of which are publicly available on Denison's website. These two policies create the conditions for an inclusive and diverse work environment and a safe work culture for all. Policies will be adapted to the conditions of the Project and Denison welcomes specific feedback on Métis interests and concerns. Further, Section 12.2.5 Mitigation Measures for Community Well-being describes the establishment of health and wellness programming on-site, an Employee and Family Assistance Program (EFAP), a no alcohol and drug policy on Project site, the enforcement of Denison's Environment, Health, Safety, and Sustainability Policy, the implementation of culturally sensitive employment policies to support the Indigenous workforce (for example, having an Elder representative at the Project site to provide cultural programming), among others.

461	MN-S (March 4, 2023)	Section 4.3.2.4.3 Key Issues and Concerns	Issue #4-011: Denison created “Key Issues and Concerns” tables in their EIS to document responses to issues and concerns identified by Indigenous Groups. Denison marked issues and concerns that they believe have been addressed as “Complete” in “Key Issues and Concerns” tables throughout the Draft EIS. Directing MN-S and Métis Locals to chapters within the EIS is not a sufficient response to an issue or concern identified by MN-S and Métis peoples. One- way information sharing is not an effective means for addressing or mitigating issues and concerns identified by MN-S and Métis people. Responses to issues regarding effects should discuss the presence or absence of effects, rather than responding that effects were studied. Recommendations: - Denison needs to respond to issues and concerns identified through engagement during meetings with and communications to MN-S, MN-S, NR1 Locals, and NR3 Locals. - Denison needs to implement a collaborative engagement approach that allows MN-S, NR1 Locals, and NR3 Locals to provide feedback and inform Project decision-making, plans, and outcomes versus one-way information sharing engagement approach.	Since being advised by the MN-S in October 2019 that a number of Métis Locals had delegated to the MN-S the Duty to Consult for the Project, Denison has been engaged in extensive ongoing discussions with the MN-S with the goal of reaching agreement regarding the EA process and MN-S' participation in it. Denison continues to engage with the MN-S, inclusive of engagement in NR1 and NR3, at their direction and there is no formal engagement plan, as such Denison does not feel there is a need for MN-S review as continued engagement is informed by and at the direction of the MN-S in an ongoing manner. For example, in recognition of the MN-S potential interests in the Project, Denison and MN-S have negotiated a capacity funding agreement. This agreement outlines a mutually agreeable framework and applicable funding arrangements to facilitate the MN-S’ participation and engagement in the EA process for the Project. The parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings.
462	MN-S (March 4, 2023)	Section 4.3.4.1.2 Agreements Relative to the Environmental Assessment Process	Issue #4-014: Denison’s Draft EIS notes that Denison and MN-S were in the process of developing a capacity funding agreement. Since the Draft EIS was published, Denison and MN-S reached an agreement. Recommendations: - Denison needs to revise the Final EIS to note that a capacity funding agreement was reached with MN-S.	The EIS will be updated to reflect the capacity funding agreement reached with the MN-S.
463	MN-S (March 4, 2023)	Section 5.3.1 Valued Components Selection	Issue #5-001: Métis input to VC selection was limited to NR3 communities. Recommendations: - Denison needs to confirm the selected valued components with Métis Locals in NR1 and NR3 and revise the Final EIS as required to reflect their input.	At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time. 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.
464	MN-S (March 4, 2023)	Section 5.4 Influence of Indigenous Knowledge, Local Knowledge, and Engagement	Issue #5-002: The use of “complimentary and influential” does not reflect current best practices that acknowledge Indigenous Knowledge as an equal but different way of knowing (than western science). This terminology implies that Indigenous Knowledge can be absorbed into a scientific approach. Recommendations: - Denison needs to confirm use of the wording “complimentary and influential” and how the use of Indigenous Knowledge is treated as equal to western science in the Final EIS. - Denison needs to confirm if it intends the use of “complimentary” or “complementary”. Best practices will differ depending on intention.	Section 5.1 of the EIS explains that the project is assessment under the Canadian Environmental Assessment Act, 2012, along with the Saskatchewan Environmental Assessment Act. As such, the Canadian Environmental Assessment Agency's reference guidance (CEAA 2015) on considering Aboriginal traditional knowledge for EAs under the Canadian Environmental Assessment Act 2012 is considered as relevant guidance. Further to this (see Section 3.3.1 of the EIS) Denison has committed to working with Indigenous communities in a spirit of mutual respect and cooperation. Denison's Indigenous Peoples Policy reflects the company's belief that reconciliation is advanced through collaboration with Indigenous peoples and communities to build long-lasting, respectful, trusting, and mutually beneficial relationships. Section 3.2.2 of the EIS notes that access to Indigenous Knowledge is a privilege and must be respected. Prior to sharing and collecting IK, local protocols and procedures developed by the Indigenous COIs for the management of IK were requested and applied. For some communities, this meant Indigenous Knowledge was shared with Denison and its consultants for use in the EIS with measures in place to protect the privacy of the IK, and in others communities consented to reports being shared and appended to the EIS itself. Denison will continue to work with the Indigenous COIs to ensure this information is shared and protected in manner consistent with community protocols. Noted, the use of 'complimentary' and 'complementary' will be revisited throughout the EIS.

465	MN-S (March 4, 2023)	Section 5.6.1 Potential Interactions Between the Project and Valued Components/Key Indicators	Issue #5-003: Interactions with the Human Environment Valued Components should be consistent with interaction table in related technical VC assessment sections. Comments have been made for revision to some of the interaction table in related VCs. Recommendations: - Denison needs to update Table 5.6-2 be to be consistent with revised interaction tables for related VCs.	Acknowledged. Table 5.6-2, Summary Interaction Matrix for Valued Components in the Human Environment, will be cross-checked against the VC interactions tables related to the biophysical environment and updated for consistency in the final EIS, and in consideration of the comments provided by the reviewer on the individual biophysical environment VC interaction tables as noted.
466	MN-S (March 4, 2023)	Section 5.3 Scope of the Assessment	Issue #5-004: It's best practice in environmental assessments to acknowledge limitations on data and analysis used for the assessment. This identifies constraints imposed on the assessment due to limitations in data or analysis that can influence or limit the ability to predict potential effects of the Project. This may be provided as a "technical boundary" or in some other transparent way as a part of the assessment reporting. Recommendations: - Denison needs to provide details in the Final EIS on data and analysis limitations.	Data and analysis limitations are described within the relevant VCs existing environment, where applicable. As an example, See Section 12.2.3 Existing Environment for Community Well-Being which describes the limitations of Statistics Canada Census of Population Data, the limitations of Statistics Canada incident-based crime statistics, limitations associated to key person interviews, and others.
467	MN-S (March 4, 2023)	Section 5.8 Residual Effects Evaluation	Issue #5-005: Details should be provided on what level of residual effects are carried forward for residual effects evaluation. This would help provide a consistent method for bringing measurable effects for a full residual effect assessment. This ensures that measurable (even minor) are not overlooked in residual effects characterization and consideration of significance. From review of the Draft EIS, there are instances where effects that remain after the implementation of all mitigation measures and management plans are characterized as minor and not carried forward for evaluation. Recommendations: - Denison needs to provide details on the development and choice of thresholds used to describe residual effects including how LK and IK were considered in threshold development. - Denison needs to provide further explanation as to why minor effects will have no or negligible effects and should not be considered further.	Section 5 of the draft EIS provides an overview of the assessment methodology, including how residual effects were characterized (i.e., those effects that were measurable after consideration of proposed mitigation. Each technical section of the draft EIS where effects are considered (draft EIS Sections 6 through 13) uses this assessment framework in consideration of the specific VCs / KIs that have bee defined to represent that environmental component. Effects thresholds that define the presence / or absence of a residual effect have been described for each VC / KI. In some cases the thresholds are narrative in nature and in some cases, where available, numeric thresholds are used. The former tended to be based on SME knowledge and experience in like assessments and situations and in the latter the thresholds tended to be derived from published environmental quality objectives and guidelines. As an example, the manner by which residual effects were characterized for the Fish and Fish Habitat VC is given. Section 8.3.6.1 of the draft EIS provides the definition for a residual effect as follows, "A residual adverse effect on the Fish and Fish Habitat VC is defined as a measurable change in the concentrations of a surface water quality parameter(s) that exceed relevant water quality assessment benchmarks that represent concentrations that are protective of aquatic biota and water uses in watercourse and waterbodies that receive mine-affected drainage. " In this example a numeric threshold is used (i.e., a relevant water quality assessment benchmark) and rationale is provided for its use (i.e., represent concentrations that are protective of aquatic biota and water uses in watercourse and waterbodies that receive mine-affected drainage). The threshold is both transparent and reasonable with the context of the assessment, though it is acknowledged that some level of change in the VC (or more precisely its measurable parameter) is deemed acceptable on condition that the change is not of a magnitude from which negative effects could accrue. Each technical section of the draft EIS where effects are considered (draft EIS Sections 6 through 13) notes how Indigenous Knowledge (IK), Local Knowledge (LK) and Engagement influenced the assessment. Whether generic or specific in nature the information was considered and woven into the assessment where possible. For example, water and the protection of water was generally noted as a key consideration to Indigenous peoples and LK holders. Accordingly, informs the framework of the assessment to ensure that water quality related VCs are included to provide a comprehensive evaluation related to water quality and affirms the need to assess water quality and sediment quality as they inform assessments for benthic invertebrates, fish and fish habitat, human health, and Indigenous land and resource use components.

468	MN-S (March 4, 2023)	Section 5.9.1 Cumulative Effects Assessment Process Section 12.1.7 Cumulative Effects	Issue #5-006 and 12-005: Denison acknowledges that cumulative effects are important to Indigenous communities in section 5.9.3 (p. 5-42). For many Indigenous communities and governments, cumulative effects analysis requires an assessment this includes pre-development conditions to understand the impacts of past and existing activities that continue to affect the context for environmental and social systems. Considering the fuller context of historic change during an EA is an evolving best practice and is recognized through numerous Canadian cumulative effects assessment initiatives and management frameworks (e.g., Indigenous Centre for Cumulative Effects) and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process). Recommendations: - Denison needs to provide further detail on what projects and activities were considered in the cumulative effects i.e., table listing projects. - Denison needs to provide further detail on how it considers cumulative effects important to Indigenous communities and whether it includes an evaluation of changes to pre- development conditions as is being done as practice in other environmental assessments. This would allow Indigenous communities to better understand the ongoing impacts of past and existing activities that continue to affect Indigenous cultural use of lands and resources.	With respect to review comment i) the following is noted. Section 5.9.2 of the draft EIS provides an overview of other Projects and activities that were considered present and reasonably foreseeable and could be a source of residual effects that could interact with the Project-specific residual effects. A preliminary list of projects and activities for potential consideration in the VC-specific cumulative effects assessment for the Project was provided in Table 5.9-1 of the draft EIS and their locations were shown relative to the Project site in Figure 5.9-1. Per Section 5.9.2.1 of the draft EIS, the original (or "preliminary") list of Projects and activities was scrutinized relative to various screening criteria to identify those present and reasonably foreseeable Projects and activities that were likely to interact with the Project VC in cumulative manner. It was this subset of Projects and activities that was carried forward into the cumulative effects assessment as described in Section 5.9.2.1.1 of the draft EIS. With respect to comment ii) the following is noted. The Wheeler River Project EIS is subject the Canadian Environmental Assessment Act, 2012. In this assessment framework, the Project-specific cumulative effects assessment (CEA) considers whether residual adverse effects of the Project on a given VC will overlap spatially and/or temporally with residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. The CEA follows standard methodology as per provincial (e.g., Guidelines for an Environmental Assessment [Government of Saskatchewan 2022]) and federal guidance (e.g., Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 [Government of Canada 2019]). As noted in the IR, Section 5.9.3 of the draft EIS describes how Denison considers the cumulative effects assessment to be important to Indigenous peoples. As noted, the cumulative effects assessment is important to Indigenous communities because incremental effects to the environment can weaken resource economies, affect important resources such as plants, fish, and wildlife, affect rights-based and cultural activities, and affect both the health of wildlife and humans. Denison also noted and acknowledged the important relationship of the Indigenous Communities of Interest to the lands and waters in the Project study areas and sought out information from Indigenous Communities of Interest (ERFN and the Kineepik Métis Local #9 at Pinehouse (KML)) with respect to their Indigenous Knowledge on past, present, and predicted cumulative effects. Denison believes that the cumulative effects assessment does appropriately consider changes to pre- development conditions. References Government of Canada. 2019. Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012. https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/assessing-cumulative-environmental-effects-ceaa2012.html. Government of Saskatchewan. 2022. Guidelines for an Environmental Assessment. https://www.saskatchewan.ca/business/environmental-protection-and-sustainability/environmental-assessment/does-my-project-need-an-environmental-assessment.
469	MN-S (March 4, 2023)	Section 5.9.2 Identification of Present or Reasonably Foreseeable Projects and Activities	Issue #5-007: Clarity is required that this includes existing ongoing activities that may not be certain but are highly likely to occur such as forestry and mine exploration activity. Denison did not include the new powerline that SaskPower is building in Table 5.9-1: Projects and Activities for Consideration in the Cumulative Effects Assessment for the Valued Components. See Section 2.3.1.9 for more details on the powerline to be constructed by SaskPower. Recommendations: - Denison needs to provide further detail on the projects and activities that were considered for cumulative effects and why certain projects and activities were not included. For example, Denison needs to explain how reasonably foreseeable projects and activities that may not be certain but are highly likely in the RSA, such as mining exploration or infrastructure use and maintenance, are not included in Table 5.9-1.	Section 5.9.2 of the draft EIS provides an overview of other Projects and activities that were considered present and reasonably foreseeable and could be a source of residual effects that could interact with the Project-specific residual effects. A preliminary list of projects and activities for potential consideration in the VC-specific cumulative effects assessment for the Project was provided in Table 5.9-1 of the draft EIS and their locations were shown relative to the Project site in Figure 5.9-1. Per Section 5.9.2.1 of the draft EIS, the original (or "preliminary") list of Projects and activities was scrutinized relative to various screening criteria to identify those present and reasonably foreseeable Projects and activities that were likely to interact with the Project VC in cumulative manner. Also show in Section 5.9.2.1 are the criteria by which the Present or Reasonably Foreseeable Projects and Activities were assessed. These criteria are consistent with CEAA's interim technical guidance on a future project (or physical activity) and how it could be considered reasonably foreseeable and areas as follows: • The intent to proceed is officially announced by a proponent. • The project or activity is under regulatory review (i.e., the application is in process). • The submission for regulatory review is imminent. • The project or activity is identified in a publicly available development plan that is approved or for which approval is anticipated (e.g., a wastewater treatment plant in a city's long term development plan). • The physical activity supports—or is consistent with—the long-term economic or financial

				assumptions and engineering assumptions made for the project's planning purposes. • A physical activity is required in order for the project to proceed (e.g., rail or port transportation facilities, or a transmission line). • The economic feasibility of the project is contingent upon the future development. • The completion of the project would facilitate or enable the future development. Further information with respect to present and reasonably foreseeable projects and activities pertaining to exploration and mining activities, infrastructure use and maintenance, lodges/outfitters and tourist/ recreational activities and Indigenous and other land use activities are described in draft EIS Sections 5.9.2.1.1 through 5.9.2.1.4, respectively. Rationale for not carrying forward projects / activities that were part of initial screening is described in Section 5.9.2.2. The review comments has specifically references the power line development associated with the implementation of the Project. In response the following is offered. While it is true the power line to service the Project will be constructed by Sask Power the power line has been considered a Project activity for the purpose of the effects assessment and has been assessed in that context. With that there is no rationale nor need for assessing it as a separate project / activity within the CEA.
470	MN-S (March 4, 2023)	Section 7.4.1 Potential Project- Valued Components Interactions	Issue #7-001: There is lack of geotechnical information in the Draft EIS that would expand explanation of Project interactions with geology and groundwater. Recommendations: - The Final EIS needs to demonstrate Denison's commitment to developing appropriate mitigations to avoid or limit identified adverse effects resulting from the Project, whether direct or indirect.	Denison recognizes that geology and groundwater are of particular importance within the context of the EIS given the proposed mining method and believes that the assessment presented in the EIS and its supporting documentation is comprehensive. Denison is committed to developing / implementing appropriate mitigations to avoid or limit identified adverse effects resulting from the Project, whether direct or indirect. Proposed mitigation measures specific to geology and groundwater and presented in the draft EIS, Section 7.5, Mitigation Measures, and Table 7.5-1 therein provides a summary of mitigation measures based on Project phases for the geology and groundwater VC.
471	MN-S (March 4, 2023)	Section 7.5 Mitigation Measures	Issue #7-002: There is lack of information, details and modelling related to potential subsidence. Recommendations: - Denison needs to provide additional detail in the Final EIS about mitigation measures related to operations affecting subsidence at ground surface including managing for different subsidence areas, different subsidence sizes, and whether subsidence will propagate further ground surface disturbances that will require further and continuous action. - Denison needs to prepare a management and monitoring plan for subsidence.	To clarify with respect to the potential for subsidence, it is noted that the portion of the deposit being mined is never truly a void and what remains after mining will be a honeycomb texture with water-filled interstices. The mined area is filled with a fluid at all times, whether it be a mining solution, groundwater, or the neutralizing solution. This is different from a more traditional underground operation such as Cigar Lake, where there is physical excavation of the orebody, leaving a temporary air-filled space. Although the uranium ore is high-grade by global standards it is not entirely massive in nature. As such, the uranium will be leached in a 'honeycomb' texture leaving behind a structure of partial intact rock mass with the remaining area being filled by fluid. This retains the pressure balance of the mining zone with the adjacent water-saturated rock masses. Although the above provides context on the absence of true, air-filled voids remaining post-mining, the risk of subsidence has been assessed appropriately in the draft EIS and its supporting documents (see draft EIS as Appendix K to Appendix 7-C; see also draft EIS Section 7 Geology Valued Component - Terrain Morphology and Stability Key Indicator and draft EIS Section 9 Terrain Valued Component - Terrain Morphology Key Indicator and Terrain Stability Key Indicator). The analysis presented in the draft EIS shows there is negligible risk of subsistence and the magnitude of subsistence, if it were to occur, is the range of 7.5 cm at surface. Subsequent to the filing of the draft EIS, Denison has undertaken additional modelling with refined, more granular inputs including consideration of subunits within the altered zone. With this more refined analysis, the potential surface subsidence has been reduced from 7.5 cm to 2.4 to 2.8 mm. Further, this potential subsidence, if it were to occur, would be limited to the footprint directly above the deposit. Given the low levels of risk that has been determined, Denison believes the monitoring and contingency plans as envisioned in the draft EIS are commensurate with this low level of risk and appropriate.

472	MN-S (March 4, 2023)	Section 8.0 Aquatic Environment	Issue #8-001: Key waterbodies are inconsistently named on the maps/figures throughout section Section 8.0 Aquatic Environment. Key waterbodies include those considered as reference or exposure waterbodies, and any others of importance to NR2 and NR3 Locals. Recommendations: - Denison needs to revise maps/figures to include labels for key waterbodies referenced in the EIS, particularly for figures included in section 8. - Denison needs to ensure waterbodies are named consistently throughout section 8.0 Aquatic Environment.	Acknowledged. Denison will update all maps/figures throughout Section 8 in the final EIS to more consistently include lake names.
473	MN-S (March 4, 2023)	Section 8.3.6.1 Residual Effects Characterization	Issue #8-002: Not all fishing and hunting activities are documented. Currently, the MKS has not been completed and therefore this assumption may be incorrect. Recommendations: - Denison needs to revise the fish and fish habitat section as part of the inclusion and consideration of the MKS in the Final EIS. - Denison needs to include additional information in the Final EIS that describes data limitations. A conservative approach would consider all waterbodies in the area to be potential fishing waterbodies for current and future use purposes.	The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. The Métis Knowledge Study was received by Denison on October 24, 2023, and Denison has integrated relevant information from the Study into the EIS accordingly. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment. While Denison acknowledges the comment regarding what it perceives as a desire to include more regional data regarding fishing waterbodies of interest to MN-S within the context of cumulative effects, it believes the draft EIS and supporting documentation (including the aquatic environment baseline report, Appendix 8-D) provide a spatially extensive and appropriate description of fish habitat and fish resources in water bodies and water courses to assess potential cumulative effects given the spatial extent of Project interactions with the environment. For the purpose of a Project-specific CEA a cumulative effect can only exist when a residual Project effect overlaps in time and space with other current or reasonably foreseeable projects / activities. Where no such overlap exists, it is beyond the scope of a Project-specific CEA.
474	MN-S (March 4, 2023)	Section 8.3.8 Monitoring and Follow-up	Issue #8-003: Russell Lake is not identified as a location to monitor fish health. Recommendations: - Denison needs to include Russell Lake in the aquatic monitoring program as cumulative effects from the Key Lake operation will be detected in this waterbody and this is an important local fisheries resource waterbody. - Denison should commit to involving MN-S, NR1 and NR3 in the development of management and monitoring plans for the aquatic environment in the Final EIS.	As indicated in the review comment, Russell Lake was not specifically referenced as a location to monitor fish health. This would be based on the draft EIS conclusion that environmental change that might affect fish health (e.g., water quality) would not extend beyond the LSA and into Russell Lake. This however does not preclude incorporating Russell Lake into follow up monitoring based on alternative rationale. Specific details for follow up monitoring program design have yet to be developed and the appropriateness / suitability of sampling areas (including Russell Lake) will be evaluated through that process. Such determinations as to the appropriateness of sampling areas to be utilized for follow up monitoring for the aquatic environment will be made when that monitoring program / plan documentation is developed and would be subject to discussion with Interested Parties. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions. For further reference the following provides an overview of the information presented in the draft EIS and its supporting documentation regarding Russel Lake. Aquatic baseline surveys were conducted at two stations (LAB-1 and LAB-2) in Russell Lake and were considered 'far-field' stations in relation to the proposed mining plan for the Wheeler River Project. Data collection

				methods and results are presented in the draft EIS throughout the applicable subsections of Section 8. • Section 8.2 details the Surface Water Quality methods and results, • Sections 8.3 and 8.5 detail fish habitat, community, and health methods and results; and • Section 8.4 details sediment quality and benthic invertebrate community and chemistry methods and results. A breakdown of where specific processes and results are located for each of these components is presented below: Surface Water Quality/Chemistry: Surface Water Quality was sampled in Russell Lake. Methods and metrics are presented in Section 8.2.3.1. Water was sampled in Russell Lake and presented in Table 8.2-2 (Pages 8-60 to 8-62) of Section 8.2.3.3 of the EIS report, and summarized in Table 8.2-4. Surface Water predicted maximum Constituents of Potential Concern for the Russell Lake Inlet (LAB-1) are presented in Table 8.2-13 of Section 8.2.4.2.4. Cumulative effects are also assessed in Section 8.2.7. Detailed baseline summary data is presented in Appendix 8-D of the report in Table 3-3. Sediment Quality/Chemistry: Sediment was sampled in Russell Lake, and the sample methodology is presented in Section 8.4.3.1. Sediment grain size results are summarized in Table 8.4-2 in Section 8.4.3.2.1, and full data is presented in Appendix 8-D, Table 3-4. Sediment chemistry was summarized in Table 8.4-3, and full data is in Appendix 8-D, Table 3-5. Fish Habitat, Tissue Chemistry, and Community: Russell lake is not clearly indicated in the initial list of sample areas presented in Section 8.3.3 or Section 8.5.3; however, habitat information is presented in the Fish Habitat table (Table 8.3-4) of Section 8.3.3.2, and both Russell Lake sample locations (LAB-1 and LAB-2) and their associated fish community data are presented in the fish community map (Figure 8.3-6). Fish community and information is also presented in Table 8.3-4. Baseline fish community information is presented in Appendix 8-D of the report in Table 3-9. Fish chemistry summary data (Mean, Max, Min) for Northern Pike and White Sucker bone and tissue samples is presented in Table 8.5-2 of Section 8.5.3 of the Draft EIS. Detailed fish tissue data summary is presented in Appendix 8-D of the report in Table 3-10. Benthic Invertebrate Chemistry and Community: Benthic invertebrates were sampled in Russell Lake, and the sample methodology is presented in Section 8.4.3.1. Benthic invertebrate endpoints are summarized in Table 8.4-4 of Section 8.4.3.2.4, and benthic invertebrate chemistry is summarized in Table 8.4-5. Detailed baseline benthic invertebrate community and chemistry data is presented in Appendix 8-D of the report in Table 3-8, and community data in Tables 3-7A to 3-7D. Also, refer to Cumulative Effects sections within each part of the Aquatic Environment assessment in the draft EIS for a discussion of potential cumulative effects in Russell Lake. (i.e., Section 8.2.7 for surface water quality; Section 8.3.7 for fish and fish habitat, 8.4.7 for sediment quality and benthic invertebrates, and 8.5.7 for fish health).
475	MN-S (March 4, 2023)	Section 8.5.7.1 Potential Cumulative Effects	Issue #8-004: “Fish Health VC are primarily related to c the controlled” – there is a typo in the report. Recommendations: - Denison needs to address the typo and replace “c” with the complete word.	Acknowledged. The typo will be corrected in the final version of the EIS as follows, "Potential Project residual effects on the Fish Health VC are primarily related to controlled discharge of site water into local receiving environments during all Project phases."

476	MN-S (March 4, 2023)	Section 8.5.8 Monitoring and Follow-up	Issue #8-005: It is unclear whether there is a physical barrier between Whitefish Lake North and Whitefish Lake South that would allow Whitefish Lake North to be considered as an appropriate reference area for monitoring fish health. Recommendations: - Denison needs to clarify in the Final EIS on an appropriate reference area for monitoring fish health. - Denison needs to confirm fish movements between Whitefish Lake North and Whitefish Lake South and that Whitefish Lake North will be an appropriate reference lake. If it is not appropriate, then another reference lake such as Kochichowsky Lake may need to be considered for monitoring fish health.	To clarify, there is no physical barrier between the north and south portions of Whitefish Lake. As indicated in the review comment the north basin of Whitefish Lake was suggested in the EIS as a potential upstream or reference monitoring for aquatic environment endpoints, including those related to fish health. Specific details for follow up monitoring program design have yet to be developed and the appropriateness / suitability of sampling areas will be evaluated through that process. The north basin of Whitefish Lake is the most proximal aquatic feature upstream of where treated effluent would be discharged and in that regard is a good candidate as a reference or non-influenced area. It is understood that proximity is not the only consideration as to the suitability of an area to be utilized as a reference area - as indicated in the review comment fish movement and mobility between sampling areas is also an important consideration since it is necessary to make comparisons, in the case of fish health, between / among independent fish populations. Such determinations as to the appropriateness of sampling areas to be utilized for follow up monitoring for the aquatic environment will be made when that monitoring program / plan documentation is developed and would be subject to discussion with Interested Parties.
477	MN-S (March 4, 2023)	Section 9.1.1.3 Spatial Boundaries	Issue #9-001: The terrestrial RSA seems small in consideration of woodland caribou and determining the impacts of the Project in association with the SK1 caribou population. Recommendations: - Denison needs to evaluate the terrestrial RSA as it relates to the SK1 caribou population and Environment Canada's woodland caribou management plan. Provide a detailed explanation in the Final EIS as to how the terrestrial RSA was determined.	The Project Area was delineated to capture all direct, and most indirect, likely adverse effects on caribou; as this is the zone of influence most likely to affect caribou in the vicinity of the Project (i.e., in the vicinity of human activity, equipment use and vehicle use). The Project Area (169.6 ha) is the direct footprint of proposed Project infrastructure (74.8 ha) with a buffer applied, thereby representing the area of maximum physical disturbance. The Project Area is not VC-specific, but consistent throughout the EIS. The Wildlife LSA was designed to capture the majority of the Project effects. The LSA extends beyond Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. That is the primary rationale for selection of the spatial extent of the LSA – Denison believes this is an appropriate spatial scale that applies broadly to the wildlife VCs as a whole given the perceived mechanism of VC-Project interaction. Importantly, as noted in draft EIS Section 9.3.6.4, in the caribou assessment, the Project Area had a 500 m buffer applied to account for indirect effects/habitat alteration; this area is within the wildlife LSA (refer to Figure 9.3-14 for a map showing the spatial areas). The 500 m buffer for habitat alteration for caribou was selected in accordance with ECCC's (2020) assessment of disturbed areas, which buffered (500 m) anthropogenic disturbances to evaluate woodland caribou habitat. The alteration of available woodland caribou habitat is quantified in this EIS by applying a buffer of 500 m around the Project Area in which Project effects in the form of sensory disturbance are likely to affect available woodland caribou habitat and make it functionally unavailable for use. Boreal caribou occur as one continuous population across the SK1 range, including within the Terrestrial RSA. It was decided to not use the entire SK1 range as an assessment area (e.g., due to the dilution factor) and instead use the Terrestrial RSA to appropriately and adequately assess residual and cumulative effects in proportion to the Project. It was deemed to be not feasible to use a large area like the SK1 range to assess residual Project effects because this would provide inappropriate context or "dilute" the adverse effects of the Project on the caribou that have a home range that overlaps with the RSA. The reviewer is also referred to the response provided to Information Requirement (IR) No. 137 from the Federal Indigenous Review Team (FIRT).

478	MN-S (March 4, 2023)	Section 9.2.3.3 Wetlands Valued Components	Issue #9-002: Figure 9.2-8 identifies lakes and waterbodies separately. There is a lack of clarity between a lake and a waterbody and its treatment in the EIS. Recommendations: - Denison needs to clarify and distinguish in the Final EIS if and why lakes and waterbodies are treated differently.	Footnote 4 of Table 9.2-5 of the draft EIS describes "lakes" and "waterbodies" the difference within the context of the assessment as follows: “Lakes have been defined as either named lakes or waterbodies observed to exhibit an average depth of ≥2 m (Ecometrix Incorporated 2020). Waterbodies are defined as areas of open water observed to exhibit an average depth of <2 m (Ecometrix Incorporated 2020), or unnamed areas of open water without any existing bathymetric information." For further reference it is noted that lakes were not considered wetlands and not carried forward in our assessment, but waterbodies (identified as either <2m deep or without bathymetric information) were conservatively considered to be shallow open water wetlands and assessed in the wetland assessment.
479	MN-S (March 4, 2023)	Section 9.2.7.3 Cumulative Effects Characterization and Determination of Significance	Issue #9-003: There is inadequate evaluation of the combined impact of all of these changes in vegetation on the terrestrial ecosystem. It is unclear whether there will be any short-term or long-term impacts on the overall health of the terrestrial ecosystem due to the individual changes to the terrestrial components. Recommendations: - Denison needs to provide in the Final EIS an assessment of the cumulative impacts of all of the individual changes to the vegetation (e.g., change in vegetation types, a change in the COPC levels in vegetation and a change in wetland composition) on the entire terrestrial ecosystem.	The assessment of potential Project related effects on the vegetation VCs followed standard assessment methodology using specific KIs and associated MPs. There is no practical, reliable way to combine all of the various KIs and associated MPs into a single, combined expression of potential effects as suggested by the review comment. The standard approach and practice is that each VC is evaluated independently using the KIs and associated MPs, setting appropriately conservative effects thresholds. As outlined in draft EIS Section 9.2.7.4, the residual effects of the Project, in conjunction with the comparable residual effects from past, present, and reasonably foreseeable future projects on the vegetation abundance and constituent concentrations in vegetation KIs were predicted to be not significant. Thus, the cumulative effects are not expected to alter the integrity of the Vegetation and Ecosystems VC (i.e., it remains sustainable and available to contribute to ecological functions) and is predicted to be not significant. Similarly, the residual effects of the Project, in conjunction with the comparable residual effects from past, present, and reasonably foreseeable future projects on the listed plant species and wetlands KIs were predicted to be not significant. Thus, the cumulative effects are not expected to alter the integrity of the Listed Plant Species VC and Wetlands VC (i.e., they remain sustainable and available to contribute to ecological functions) and are predicted to be not significant.
480	MN-S (March 4, 2023)	Section 9.3.3.1.1 Scientific Literature Review	Issue #9-004: The EA assumptions for moose harvest numbers and success are based on the SK database information which includes information for hunters in the southern portion of the province and for non-Indigenous peoples. Reliance on draw licences to support Project models does not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. Métis do not participate in the draw system as they are recognized rights holders. Indigenous and non-Indigenous hunters have different hunting patterns. Although the data used in the EA is accurate for non- Indigenous hunters, this data should be used cautiously when assessing a project that is in an area where there is mostly (if not all) Indigenous hunters for moose and other ungulates. Recommendations: - Denison needs to provide confirmation that the assumption that moose harvest information used in the Draft EIS is based on the SK database which includes information for hunters in the southern portion of the province and for non- Indigenous peoples. If yes: o Denison to acknowledge in the Final EIS that the Terrestrial Ecosystem Effects Assessment relied on draw licences to support assessment conclusions and these conclusions do not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. In addition, Denison to note Métis do not participate in the draw system as they are recognized rights holders in the Final EIS. - Denison needs to incorporate Métis Knowledge from the MKS to the Project’s Terrestrial Ecosystems Effects Assessment. - Denison to co-develop and implement a moose-specific monitoring and management plan with the Métis. - Denison needs to include Métis harvesting patterns in the Final EIS (e.g., rabbit, moose, caribou, fox etc.).	With respect to bullet #1 the following is noted. Denison can confirm that the information provided in Section 9.3 (as well as 11.1) of the Draft EIS related to moose harvest data is based on the information that was publicly available from the Saskatchewan Ministry of Environment to contextualize moose harvest in the province and did not include specific harvest information from Indigenous sources as this was not available at the time. The final version of the EIS will provide further clarification as to the source of the moose harvest data, and that specifically it was obtained via the publicly available data regarding draw licenses. With respect to bullet #2 the following is noted. The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023. The Métis Knowledge Study was received by Denison on October 24, 2023, and Denison has integrated relevant information from the Study into the EIS accordingly. It is important to note that Denison has incorporated Métis land use information and perspectives into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment. With respect to bullet #3 the following is noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3, is committed to such engagement with respect to monitoring. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other stakeholders, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: programs will meet

				regulatory requirements, programs will confirm the effectiveness of mitigation measures and predictions made in the assessment, programs will be implemented in an adaptive management framework (if/where applicable) to reduce effects during the lifetime of the Project, and programs will have spatial boundaries that are sufficiently extensive to measure EIS predictions. With respect to bullet #4 the following is noted. The draft EIS was prepared in consideration of the information available to Denison at that time. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. A study agreement was signed with the MN-S to complete a Métis Knowledge Study by the end of October 2023 The Métis Knowledge Study was received by Denison on October 24, 2023, and Denison has integrated relevant information from the Study into the EIS accordingly.. It is important to note that Denison has incorporated Métis land use information and perspectives (including harvesting) into the draft EIS, through the funding of the Kineepik Métis Land and Occupancy information along with the KML VEC statement, of which relevant information has been incorporated directly into the draft EIS to determine effects to the human environment.
481	MN-S (March 4, 2023)	Section 9.3.4.2.1 Alteration and/or Loss of Habitat	Issue #9-005: The nature of vegetation regeneration on an altered landscape can have continuing effects on woodland caribou. This conclusion is sufficiently vague and assume regeneration will be suitable for woodland caribou. Denison does not provide information on the removal and decommissioning of the roads built for the Project or the extension of the transmission line in the Draft EIS. Linear disturbances like these are incredibly impactful to Métis traditional land use in and around the Project. Recommendations: - Denison needs to identify how it will be determined that post-decommissioning revegetated habitat will be suitable for woodland caribou including any risk assessments completed to confirm the predictions. - Denison needs to involve MN-S as well as NR1 and NR3 Locals in decommissioning planning, mitigation, and monitoring. - Denison to provide further information on the removal and decommissioning of roads built for the Project and the extension of the transmission line built by SaskPower in the Final EIS.	With respect to bullet #1 the following is noted. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. Consistent with this approach / process, the expectation is that restoration goals will be defined, the activities to be implemented to meet these goals will be defined and performance criteria to confirm that the goals are being / have been reached will also be defined. It is also noted that Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) during discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. As noted at this time the Plan is conceptual in nature but will go hand in hand with, and evolve with the decommissioning plan over time. Since the boreal caribou range plan for SK-1 is under development, it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan at this time is in part due to the absence of range plan priorities and reflects Denison's commitment to continue to work with ENV to meet the management objectives and management strategies for the SK1 range. With respect to bullet #2 the following is noted. 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. With respect to bullet #3 the following is noted. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. With the context of the evolution of the decommissioning plan for the site, the plans for removal and decommissioning of roads built for the Project and the transmission line will be developed as part of that process.

482	MN-S (March 4, 2023)	Section 9.3.4.2.2 Change in Mortality	Issue #9-006: Changes in the numbers of prey and/or predators during the post-decommissioning period could impact what animals are available for harvesting by the MN- S in the long-term. Recommendations: - Denison needs to clarify and confirm the duration of the habitat changes that may interfere with predator/prey densities including any risk assessments completed to confirm the predictions. - Denison needs to involve MN-S, as well as NR1 and NR3 Locals in decommissioning planning, mitigation, and monitoring.	With respect to bullet #1 the following is noted. Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. Plans for the post-decommissioning phase, including land restoration are at the conceptual stage and will evolve over time. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development, including consideration of site restoration. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed and specifics as to what the post-decommissioning landscape will entail and the wildlife it would support as referenced in the review question will be developed. It is also noted that Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) based on discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. The Plan is conceptual in nature but will go hand in hand with, and evolve with the decommissioning plan over time. Since the boreal caribou range plan for SK-1 is under development, it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan at this time is in part due to the absence of range plan priorities and reflects Denison's commitment to continue to work with ENV to meet the management objectives and management strategies for the SK1 range. With respect to bullet #2 the following is noted. 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.
483	MN-S (March 4, 2023)	Section 9.3.5.2 Additional wildlife specific mitigation measures	Issue #9-007: A wildlife monitoring plan and a Woodland Caribou Management Plan are important tools for managing caribou in the short and long-term. Recommendations: - Denison needs to involve MN-S as well as NR1 and NR3 Locals in the creation of the Woodland Caribou Management Plan, and include the plan in the Final EIS	Denison has developed a Conceptual Caribou Mitigation Plan (the Plan) based on discussions between Denison and Saskatchewan Ministry of Environment (ENV) in May and June 2023. As noted the Plan is conceptual in nature at this time, largely because of the absence of range plan priorities. Denison is committed to continue to work with ENV to meet the management objectives and management strategies for the SK1 range as the boreal caribou range plan for SK-1 is developed. The Plan is a living document and will evolve over time as more information becomes available. In this regard, 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.
484	MN-S (March 4, 2023)	Section 9.3.6.4.1 Alteration and/or Loss of Habitat	Issue #9-008: The woodland caribou may not return to the Project area for up to 20 years following post-decommissioning due to available food resources. This may have an impact on long-term harvesting of woodland caribou by the MN-S. Recommendations: - Denison needs to clarify and confirm the duration of the habitat changes that may interfere with predator/prey densities including any risk assessments completed to confirm the predictions. - Denison needs to clarify and confirm the duration of the habitat changes that may interfere with predator/prey densities including any risk assessments completed to confirm the predictions.	Denison acknowledges the comment and notes the following. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan. The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat. The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and regulators. As noted above, the boreal caribou range plan for SK-1 is under development and it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan is in part due to the absence of range plan priorities and reflects

				Denison's commitment to continue to work with the province to meet the management objectives and management strategies for the SK1 range. Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes. SK ENV will engage with Indigenous communities and nations as the province develops and refines the range management plan for SK1.
485	MN-S (March 4, 2023)	Section 9.3.7.3.3 Woodland Caribou	Issue #9-009: The 5% threshold disturbance is for a viable population which is the SK1 population. Recommendations: - Denison needs to provide confirmation that the Final EIS appropriately used the Environment Canada threshold values on the woodland caribou population as they relate to the SK1 population. - Denison needs to confirm that the RSA and threshold is suitable in areal extent. See comment 9-001. - Denison needs to commit to re-evaluating their woodland caribou information in the Final EIS. Specifically, to ensure the woodland caribou information used by Denison is in alignment with the SK1 Range Plan being developed by the Province.	In terms of the woodland caribou population in SK1, the likelihood of self-sustainability for the Boreal Shield range (SK1) has been updated from "unknown" (EC 2012) to "likely" in the amended recovery strategy (ECCC 2020). The SK1 range comprises more than 18,000,000 ha and is characterized by high fire disturbance and low anthropogenic disturbance (ECCC 2020). For SK1, the amended recovery strategy (ECCC 2020) identifies 40% undisturbed habitat in the range as the disturbance management threshold, which provides a measurable probability (71%) for the local population to be self-sustaining. This threshold is considered a minimum threshold because at 40% undisturbed habitat there remains a risk (29%) that the SK1 local population cannot be self-sustaining. According to ECCC (2020) disturbed habitat is habitat showing: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). In contrast, according to ECCC (2020) undisturbed habitat is habitat not showing any: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). The cumulative effects assessment in the draft EIS showed that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS). Specific to woodland caribou, the draft EIS evaluated and assessed potential Project-related effects on the boreal population of woodland caribou following standard environmental assessment (EA) methodology. The assessment of potential effects considered both direct (i.e., habitat loss) and indirect effects (i.e., habitat alteration) on caribou and their habitat, while assuming that caribou were present year-round and during all of their life stages (i.e., calving, rearing, mating, over wintering). The rationale for the definition of study areas for the purpose of the assessment of the Terrestrial Environment valued components (VCs) is described in Section 9.1.1 of the draft EIS. The Project Area (169 ha or 1.69 km2) and LSA were delineated based on the expected extent of potential direct (footprint) and indirect (sensory disturbance) Project effects; whereas, the RSA considered an 8 km buffer around the Project Area to provide an appropriate spatial scale upon which potential Project effects could be evaluated at the landscape scale where key Terrestrial Environment VCs reside and move within and upon which cumulative effects could be assessed. Boreal caribou occur as one continuous population across the SK1 range (18,034,870 ha), including within the Terrestrial RSA. After consideration, it was decided by Denison and its Subject Matter Experts at EDI Environmental Dynamics Inc. to use the Terrestrial RSA for the cumulative effects assessment for caribou rather than the entire SK1 range. This decision was made largely on the basis that it would not be feasible / appropriate to use a such large area like the SK1 range to assess cumulative effects since consideration of such a large spatial extent would likely "dilute" the contribution of the Project to potential effects at that scale. In support of this decision, comparison of the Project-specific habitat effects (i.e., the Project Area plus a 500 m buffer to account for sensory disturbance) relative to the scale of the SK1 range (as the applicable management unit for portion of the woodland caribou population that uses the Terrestrial RSA) was made. The comparison indicated that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS). As can be seen, the default conclusion at the range scale could only be that the Project does not contribute to cumulative effects at a practical measurable level. Denison and its SMEs believe the EIS took a precautionary or conservative approach to understanding/addressing the likely residual effects (i.e., effects remaining after mitigation

				measures were considered) of the Project on caribou and their habitat. This approach provides is appropriate as a planning tool to inform/support future Project-related regulatory approvals processes and to guide the scope and nature of follow-up monitoring. After consideration of measures to avoid and mitigate the potential for effects on caribou and their habitat it was concluded that the likely residual effects of the Project on caribou and their habitat were not significant. While the EIS did not consider specific additional opportunities to offset the non-significant effects, Denison has been working to develop a Conceptual Caribou Mitigation Plan. The plan was submitted to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan and Denison has been in close contact with the Saskatchewan Ministry of Environment (SK ENV), as stewards of woodland caribou from a regulatory perspective. References: Environment and Climate Change Canada (ECCC). 2020. Amended Recovery Strategy for the Woodland Caribou (Rangifer tarandus caribou), Boreal Population, in Canada. Species at Risk Act Recovery Strategy Series. Environment and Climate Change Canada, Ottawa. xiii + 143pp.
486	MN-S (March 4, 2023)	Section 9.3.8 Monitoring and Follow-up	Issue #9-010: Previous sections of the Draft EIS identified the development of the Woodland Caribou Management Plan. Recommendations: - Denison needs to confirm the preparation and inclusion of a Woodland Caribou Management Plan within this section of the Final EIS.	Denison acknowledges the comment and notes the following. Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan. The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination per se, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat. The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and regulators. As noted above, the boreal caribou range plan for SK-1 is under development and it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan is in part due to the absence of range plan priorities and reflects Denison's commitment to continue to work with the province to meet the management objectives and management strategies for the SK1 range. Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes. SK ENV will engage with Indigenous communities and nations as the province develops and refines the range management plan for SK1.
487	MN-S (March 4, 2023)	Section 11.1.1.1 Values Component Selection	Issue #11-001: Arrangements and applicable funding to facilitate MN-S' participation and engagement in the EA process are underway. It is expected that MN-S will be given the opportunity to validate VC selection and have this information reflected in the Final EIS. Recommendations: - Denison, in the Final EIS, needs to demonstrate that it confirmed the selected valued components with Métis Locals in NR1 and NR3. - Denison needs to include in the Final EIS input from the Métis Knowledge Study and any changes in the selection of VCs and their characterization.	At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time. 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.

488	MN-S (March 4, 2023)	Section 11.1.2.3 The Métis Nation of Saskatchewan	Issue #11-002: The EIS states: "The parties have specifically agreed to a process between each other that will be funded by Denison and undertaken on behalf of the MN-S in connection with the EA of the Project: a Métis Knowledge Study, meetings to focus on VCs and preliminary effects, and regular meetings and associated costs for hosting such meetings." The correct name is "Métis Nation-Saskatchewan" (no "of"). Recommendations: - Denison needs to correctly reference Métis Nation- Saskatchewan throughout the Final EIS. - Denison needs to include in the Final EIS input from the Métis Knowledge Study and any changes in the selection of VCs and their characterization.	The EIS will be updated throughout to the correct name "Métis Nation-Saskatchewan" (no "of"). At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time. 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.
489	MN-S (March 4, 2023)	Section 11.1.4.1 Potential Interactions Between the Project and Valued Component/Key Indicators	Issue #11-003: Many of the Project Phase/Activities listed would contribute to a change in the environmental setting for Indigenous land and resource users within the LSA. Interactions should be considered for temporary or longer-lasting aesthetics impact related to Project-related dust, lighting, noise, and visual disturbance. Recommendations: - Denison needs to revise Table 11.1-7 in the Final EIS to include the addition of interactions and effects analysis for "Perceived suitability of lands and resources therein" that considers Project-related construction and decommission impacts to Indigenous Land and Resource Use. For example, the development of access roads and site preparation during construction, and demolition and disposal of surface infrastructure during decommission, would likely result in some interaction with ILRU related to noise, dust, or traffic.	Table 11.1-7 will be revisited to include to the development of access roads and site preparation during construction, and demolition and disposal of surface infrastructure during decommission.
490	MN-S (March 4, 2023)	Section 11.1.4.3.1 Terrestrial Resource Availability	Issue #11-004: Missing information to support the claim that other large terrestrial mammals, such as elk and white-tailed deer species, are not found in sufficient abundance in the LSA to be assessed as part the Project. Recommendations: - Denison needs to include additional information in the Final EIS on why large terrestrial mammals that are harvested in the LSA (such as elk and white-tailed deer) are not found in sufficient abundance in the LSA to support this conclusion.	The Saskatchewan Ministry of Environment (SK MOE) manages the conservation and allocation of wildlife resources on behalf of all Saskatchewan residents. Many resource management tools are used to manage species abundance and to reduce conflict between resource users. Tools include hunting seasons, management areas, considering other land use activities, limiting firearm types, and harvest limits. In addition to these tools, the SK MOE has developed a wildlife allocation policy to determine how harvestable game is allocated to hunters and manage resource management conflicts (SK MOE 2017a). Section 11.2.3.1 describes that the Wildlife Management Zones and Special Areas Boundaries Regulations, 1990 (Government of Saskatchewan 2014) define Wildlife Management Zones (WMZs) as areas for managing, harvesting, controlling, or regulating wildlife. Wildlife Management Zones are defined based on several factors including ecosystem classification and by land tenure or ownership. Wildlife Management Zones are primarily used to help with species conservation, as the goal is to have hunters harvest the surplus of a species. For the management of big game, the LSA is within WMZ 75. The RSA extends into WMZs 74, 75, and 76. Section 11.2.3.1.2 describes how other big game species, such as white-tailed deer or elk, are not hunted in WMZ 75 due to the absence or low abundance of these species. Section 9.3.3.1 of the EIS describes the existing environment in terms ungulates. The ungulates VC is represented by one KI: moose. A potential reason for low moose density could be the poorly productive shield ecosystem and successional dynamics both of favour conifers at all seral stages with limited production of deciduous browse post-disturbance. Appendix 9-A describes baseline data collection for the terrestrial environment, including winter track and pellet count surveys for wildlife within the study area.

491	MN-S (March 4, 2023)	Section 11.1.5 Mitigation Measures	Issue #11-005: In the Draft EIS, Denison has proposed to develop mitigation measures and management planning, but has not begun engaging with Métis Community of Interest and MN-S on contents of mitigation measures or management plans. It is good practice for Communities of Interest, including Métis, to have the opportunity to contribute to the scoping, development, and implementation of mitigation measures and management plans (and monitoring programs), including effectiveness reviews and the application of an adaptive management approach. Recommendations: - Denison needs to include in the Final EIS, effects mitigation, and management and monitoring plans that were prepared with MN-S and NR1 and NR3 Locals involvement and agreement.	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. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
492	MN-S (March 4, 2023)	Section 11.1.8 Monitoring and Follow-up	Issue #11-06: In the Draft EIS, Denison has proposed to develop monitoring programs, but as not begun engaging with MN-S or NR1 and NR3 Locals on contents of these programs. Recommendations: - Denison needs to include in the Final EIS, management and monitoring plans that were prepared with MN-S and NR1 and NR3 Locals involvement and agreement.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.
493	MN-S (March 4, 2023)	Section 11.1.7 Cumulative Effects Section 11.2.7 Cumulative Effects	Issue #11-07 and 11-12: For many Indigenous communities and governments, cumulative effects analysis requires an assessment that includes pre-development conditions to understand the impacts of past and existing activities that continue to affect the context for environmental and social systems. An evolving best practice during an EA is to consider the fuller context of historic change. This practice is recognized through numerous Canadian cumulative effects assessment initiatives and management frameworks (e.g., Indigenous Centre for Cumulative Effects) and recent Indigenous led environmental assessment (e.g., Squamish Nation Assessment Process).	Noted.
494	MN-S (March 4, 2023)	Section 11.2.3.1.2 Big Game Hunting	Issue #11-08: The EA assumptions for big game numbers and success are based on the SK database information which includes information for hunters in the southern portion of the province and for non-Indigenous peoples. Reliance on draw licences to support Project models does not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. Métis do not participate in the draw system as they are recognized rights holders. Recommendations: - Denison to acknowledge in the Final EIS that the Terrestrial Ecosystem Effects Assessment relied on draw licences to support assessment conclusions and these conclusions do not capture Métis harvesting and traditional use activities in the Northern Administrative District of Saskatchewan. In addition, Denison to note Métis do not participate in the draw system as they are recognized rights holders in the Final EIS. - Denison needs to incorporate Métis Knowledge from the MKS to the Project's Terrestrial Ecosystems Effects Assessment.	Section 9.3.3.1.1 describes how the Project is located in WMZ 75, while WMZ 73, 74, and 76 are adjoining WMZ 75 (Figure 9.3 6). Between 2014 and 2020 (the years for which data are available), no draw licences were sold for any of these WMZ and, therefore, no associated harvest was reported to have occurred in the area based on draw licenses. While this breakdown to WMZ harvest numbers is not available for resident regular licences, it is assumed that most of the annual harvest through resident regular licences occurred in the southern part of the province. 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.

495	MN-S (March 4, 2023)	Section 11.2.3.1.4 Upland Game Bird Hunting	Issue #11-09: To characterize trends in wildlife harvesting it would be more appropriate to show a period longer than 1 year; at least 5 years where available. Recommendations: - Following best practices, Denison should include at least 5 years of data in the Final EIS for upland game bird harvest and harvest effort in Game Bird Management.	Temporal boundaries for characterizing components of the OLRU existing environment varied by topic. Commercial trapping and fishing data were presented based on the data available from the Province of Saskatchewan, and with multiple years of data presented where available. Other topics such as recreational fishing and hunting considered data where available, but in some instances is based on licensing quotas which do not always vary from year to year, or are based on self-reported outcomes. Specific to game bird harvesting, over 5 years of data is provided on annual grouse harvest (2014 to 2020) in Section 9.4.3, Table 9.4-3.
496	MN-S (March 4, 2023)	Section 11.2.3.9 Indigenous Perspectives on Other Land and Resource Use	Issue #11-10: The characterization of Indigenous perspectives on other land and resource use does not yet reflect MN-S and NR1 and NR3 Locals values or interests as this has not yet been provided. It is expected that when made available, this information will be reflected in the Final EIS. Recommendations: - Denison needs to include in the Final EIS, information provided by Métis Locals in NR1 and NR3 on their perspectives on other land and resource use.	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. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
497	MN-S (March 4, 2023)	Section 11.2.4.5.1 Aesthetic Experience	Issue #11-011: This conclusion is not consistent with the methods detailed on page 5-30 in section 5.8 as the Draft EIS identifies noticeable residual effects related to traffic (increased traffic volume) and noise (low to moderate impact). These effects should be taken to residual effects assessment. Recommendations: - To be consistent with the methods detailed in section 5.8, Denison should include all noticeable Project-related effects for residual effects assessment. For example, effects were identified related to traffic (increased traffic volume) and noise (low to moderate impact) but were not taken to residual effects assessment for Other Land and Resource Use in the Final EIS.	Potential Project disturbances considered under this pathway included increases in traffic, noise, air quality, modification of the wilderness experience, and increases in competition for resources. These disturbances will be most detectible in locations proximal to the Project site. Effects have the most potential to affect cabin leaseholders due to their use of ground travel, hunting and fishing activities, and general proximity to the Project. With the exception of dust which has proven mitigation strategies, the overall disturbances are negligible and there are a limited number of resource users who will experience them to any detectible degree. Therefore, this pathway is not carried forward for residual effects assessment. Section 11.2.5 describes the mitigation measures to reduce the impacts of traffic, noise, and others. Further mitigations for traffic are described in Section 12.3.5 in Section 12 and for noise are described in Section 6.2.5 in Section 6.
498	MN-S (March 4, 2023)	Section 12.1.2.3 Other Sources of Information and Local Knowledge	Issue #12-001: Arrangements and applicable funding to facilitate the MN-S' participation and engagement in the EA process are underway. It's expected that MN-S will be given the opportunity to provide information related to cultural expression and this information will be reflected in the Final EIS. Recommendations: - Denison needs to include in the Final EIS, information provided by Métis Locals in NR1 and NR3 on their input related to cultural expression.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing

				adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
499	MN-S (March 4, 2023)	Section 12.1.4.2.1 Potential Effect 1: Change in Knowledge Transmission	Issue #12-002: Need some clarification on this statement as it's reasonable to assume that both parents (mother and father), aunts' and uncles, and other relatives who are members of the community/family would potentially be employed and be away from home. Transmission of knowledge has the potential to be disturbed if multiple family and community members are away on working rotation. Recommendations: - Denison needs to provide clarity in the Final EIS on the statement that "knowledge transmission is likely to continue because the entire family and community are involved'" considering the potential that with local hiring practices in place, multiple family and community members may be away on working rotation and not able to adequately facilitate knowledge transfer.	Denison acknowledges that both parents (mother and father), aunts' and uncles, and other relatives who are members of the community/family could potentially be employed by the Project. Mitigation measures associated with potential effects to cultural continuity and the commuter-rotation system are described in Section 12.1.5 and include: - Working 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, where practicable; - 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 (see Section 11 for a description of potential effects to land use). Denison remains committed to maintain positive working relationships with all Indigenous COIs and will be open to discussion on any issues or concerns that arise. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
500	MN-S (March 4, 2023)	Section 12.1.4.2.1 Potential Effect 1: Change in Knowledge Transmission	Issue #12-003:The Draft EIS points to follow-up programs as a way to address any uncertainties identified during the EA process. Insufficient detail is provided to reflect how avoidance of areas near the Project may occur; monitoring (and adaptive management) is needed. More clarity on how monitoring will be developed (in section 12.1.8, p. 12-34) to address this uncertainty. Recommendations: - Denison needs to provide more detail in the Final EIS on monitoring (and adaptive management) for areas of uncertainty such as displacement of cultural activities. This includes management and monitoring plans that were prepared with MN-S involvement and agreement.	Changes to knowledge transmission as described in Section 12.1.4.2.1 stem from two factors: changes to Indigenous Land and Resource Use, and individual participation in the commuter rotation system - both of which have the potential to affect the ways in which individuals spend time participating in cultural activities. Although there is some uncertainty as to the extent to which individuals will continue to participate in activities that support knowledge transmission, experience from other uranium operations in northern Saskatchewan, the shared and communal nature of cultural expression (i.e., occurs within entire extended families and communities) combined with the Project's minimal effects to land and resource use are not expected to alter the ways in which cultural expression currently occurs (or might vary under regular circumstances). As such, no specific monitoring related to changes to cultural expression are planned. Denison acknowledges the concern raised regarding cultural activities related to working at an industrial operation. Mitigation measures associated with potential effects to cultural continuity (including knowledge transfer and language) are described in Section 12.1.5 and include: - working 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; and - implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation; 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. Denison remains committed to maintaining positing relationships

				with Indigenous communities and will be open to discussion on any issues or concerns that arise over the course of the Project.
501	MN-S (March 4, 2023)	Section 12.1.4.2.2 Potential Effect 2: Change in Traditional Diet	Issue #12-004: The EIS states: "Experience from other uranium operations in northern Saskatchewan suggests that resource use will continue despite the potential selenium exceedance. . . members had developed their own culturally appropriate practice of risk assessment and management based on their relationship with the land. . . .The ERFN Trapper had a positive relationship with other uranium operations in the ILRU LSA." The claims made in this section sound like the potential Project effects being identified are to be mitigated by ILRU users' behavior, based on past behavior patterns, rather than Project mitigation. Recommendations: - Denison needs to include in the Final EIS, health risk assessment management and monitoring plans that are prepared with MN-S involvement and agreement to address suitability of land and resources for Indigenous land users. - Denison should confirm this assertion through a monitoring program that will focus on providing data to verify the predictions and include communication planning to convey health risk assessment results. This may also address assumptions about perceived suitability of lands and resources.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.
502	MN-S (March 4, 2023)	Section 12.1.8 Monitoring and Follow-up	Issue #12-006: Areas of uncertainty were identified in the analysis of Cultural Expression (e.g., displacement of cultural activities). Adaptive management is an appropriate strategy for helping to reduce uncertainty about environmental effects and the effectiveness of mitigation. It provides flexibility to identify new mitigation measures or to modify existing ones during the life of the Project. In the Draft EIS, Denison has proposed to develop monitoring programs, but has not begun engaging with MN-S on contents of these programs. As a rights holder, MN-S should have the opportunity to contribute to the scoping, development, and implementation of monitoring programs, including effectiveness reviews and the application of an adaptive management approach. Recommendations: - Considering areas of uncertainty were identified in the analysis of Cultural Expression (e.g., displacement of cultural activities) in the Draft EIS, MN-S request more details in the Final EIS on monitoring (and adaptive management) for areas of uncertainty related to Indigenous cultural expression. This includes a monitoring program that will focus on providing data to verify the predictions and include communication planning to convey health risk assessment results. This may also address assumptions about perceived suitability of lands and resources.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

503	MN-S (March 4, 2023)	Section 12.2.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment	Issue #12-007: Arrangements and applicable funding for a Métis Knowledge study is underway but not yet incorporated in the assessment. Recommendations: - Denison, in the Final EIS, needs to incorporate the outcome of the Métis Knowledge Study.	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. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
504	MN-S (March 4, 2023)	Section 12.2.4.1 Potential Interactions Between the Project and Valued Component / Key Indicators	Issue #12-08: The interaction table (12.2-5) identifies “Employment and Expenditures” as the only project component that would influence community well-being. This is inconsistent with previous interactions tables and information in the Draft EIS that identified potential interactions with the physical components and activities of the project that could affect aspects of community identity and cohesion (e.g., section 12.1 Cultural Expression). Comments were raised in the Draft EIS that community health and well- being is related to the relationship with the environment including issues such as changes in water quality or quantity, and mental health being affected by industrial development. Furthermore, section 12.2.3.3 (p. 12-66 to 12-73) identifies the natural environment as a component of community cohesion. This should be better reflected in the analysis of Community Well-being. Recommendations: - In the Final EIS, Table 12.2-5: Potential Project Interactions for Community Well-being (p. 12-74 to 12-77) should include the addition of interactions and effects analysis for “Change in Community Cohesion” that considers Project- related construction, operations, and decommission impacts to mental, physical, and cultural health that stem from a relationship with the environment.	Denison acknowledges that there is an interrelationship between the two and for the purposes of the EIS ha been organized into separate sections. Section 11.1 provides an assessment on perceived suitability of lands and resources therein, along with human health. See Section 11.1.4, 11.1.5, and 11.1.6 for further information.
505	MN-S (March 4, 2023)	Section 12.2.4.2.1 Potential Effect 1 – Change in Population and Demographics	Issue #12-009: In the Draft EIS, Denison has proposed to develop mitigation measures and management planning, but as not begun engaging with MN-S on contents of mitigation measures or management plans. As a rights holder, MN-S should have the opportunity to contribute to the scoping, development, and implementation of mitigations, such as input into the location of pick-up points and commuter transportation options. Recommendations: - The Final EIS should include detail on how the input provided by Métis Locals in NR1 and NR3 and MN-S will influence the development of the location of pick-up points and commuter transportation options and address concerns related to in-migration and out-migration pressures.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

506	MN-S (March 4, 2023)	Section 12.2.4.2.2 Potential Effect 2 – Change in Income	Issue #12-010: The EIS states: “Best efforts will be made to make sure employment is maximized, including within the LSA communities and to encourage business participation within the LSA.” (p. 12-80) “Best efforts will be made . . .” is a vague statement about project-related plans to maximize local training, employment, and procurement opportunities that would beneficially impact income levels for residents. More detail is needed to understand Denison's approach and commitment to increased personal income for residents of the LSA. Recommendations: - Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation as well as supports for employee retention. More information is needed to understand Denison's approach and commitment to increased personal income for residents of the LSA - Denison to expand the LSA communities to include all potentially impacted NR1 and NR3 Locals.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. The LSA for the assessment of the economy includes ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Pinehouse Lake, and Beauval. The RSA for the Economy VC is the Northern Saskatchewan Administrative District (Census Division 18), which is defined in The Northern Municipalities Act, 2010 (Government of Saskatchewan 2010). This area shares many economic and demographic characteristics with the LSA and is a relevant reference point. 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. 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.
507	MN-S (March 4, 2023)	Section 12.2.4.2.2 Potential Effect 2 – Change in Income	Issue #12-011: “Community concerns” are identified related to broader spatial (having to move away to work) and temporal (“crash” after project) uncertainty for increased income. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to income for residents of the LSA. Recommendations: - Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation as well as supports for employee retention. More information is needed to understand Denison's approach and commitment to addressing community concerns related to increased personal income for residents of the LSA. - Decommissioning planning needs to consider employment transition in addition to site clean-up to avoid boom and bust scenarios.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. The LSA for the assessment of the economy includes ERFN (including Indian Reserve Wapachewunak 192D and Indian Reserve La Plonge 192) and Patuanak, Pinehouse Lake, and Beauval. The RSA for the Economy VC is the Northern Saskatchewan Administrative District (Census Division 18), which is defined in The Northern Municipalities Act, 2010 (Government of Saskatchewan 2010). This area shares many economic and demographic characteristics with the LSA and is a relevant reference point. 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.

				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.
508	MN-S (March 4, 2023)	Section 12.2.4.2.3 Potential Effect 3 – Change in Community Cohesion	Issue #12-012: "Community concerns" are identified related to impact to family and community cohesion due to working away from home for long periods. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to community and family cohesion effects for residents of the LSA. Recommendations: - Denison needs to provide more detail within the Final EIS related to worker rotation system mitigation. Particularly considering the identification of reported difficulty in balancing the demands of a worker rotation system with domestic commitments, and many local community members concern of being unable to achieve a work-life balance.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. Denison recognizes that both parents and members of the community/family could potentially be employed by the Project. Mitigation measures associated with potential effects to community cohesion and the commuter-rotation system are described in Section 12.1.5 and include: - Working 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, where practicable; - 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 (see Section 11 for a description of potential effects to land use). As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
509	MN-S (March 4, 2023)	Section 12.2.4.2.3 Potential Effect 3 – Change in Community Cohesion	Issue #12-013: Terminology like "could" is a vague indicator of commitment to developing strategies to address training and support systems for workers. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to providing appropriate local resources for training and support as access to education and supports systems effects for residents of the LSA. Recommendations: - Denison needs to provide more detail within the Final EIS related to their role in developing and providing culturally appropriate resources for training, education and supports systems as access has already been identified as a barrier to local communities. - Denison needs to support Métis training opportunities through Northlands College.	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. All positions at the Project will require a Grade 12 education or equivalent. Section 13.3.2.1 describes how foundational positions (i.e. entry level) require Grade 12 education and in-house training programs, although a combination of skills and experience may be considered. These positions would include process plant operators, site services, drillers, and catering/janitorial staff. Denison will update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in

				Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.
510	MN-S (March 4, 2023)	Section 12.2.5 Mitigation Measures	Issue #12-014: More detail is needed to understand the types and scope of health and wellness programs. Many of the services listed below this statement are standard health and safety measures for industrial sites and only accessible to on-site staff. They do not address community issues of health and well-being. Recommendations: - Denison needs to provide more detail within the Final EIS related to the health and wellness programs and their role in developing and providing resources of this type. This should include the provision of services more broadly within communities, not just to individuals on-site. - Denison to confirm how Métis input is considered in mitigation development.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.
511	MN-S (March 4, 2023)	Section 12.2.5 Mitigation Measures	Issue #12-015: Terminology like “may” is a vague indicator of commitment to development of life skills programming. More detail is needed to understand Denison's approach and commitment to addressing community concerns related to providing appropriate local resources for supporting the well-being of residents of the LSA. Recommendations: - Denison needs to provide more detail within the Final EIS related to a commitment to developing and key components of life skills programs. It is appropriate to address the issues as they are identified as an effect of the project in the proceeding section regardless of the certainty of these effects. - Denison to confirm how Métis input is considered in mitigation development.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.
512	MN-S (March 4, 2023)	Section 12.2.5 Mitigation Measures	Issue #12-016: In the Draft EIS, Denison has proposed to develop mitigation measures and management planning, but has not begun engaging with MN-S on contents of mitigation measures or management plans. As a rights holder, MN-S should have the opportunity to contribute to the scoping, development, and implementation of mitigations, such as input into the location of pick-up points and commuter transportation options. Recommendations: - Denison needs to provide additional detail within the Final EIS, on how the input provided by MN-S, NR1 Locals, and NR3 Locals will influence the development of the location of pick-up points and commuter transportation options See also MN-S Issue #12-010	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply.

				As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
513	MN-S (March 4, 2023)	Section 12.2.5 Mitigation Measures	Issue #12-017: More clarity and commitment are required from Denison on social management mitigations and programming. For example, Denison could implement established mitigations to address effects that are identified in the Draft EIS related to community well-being, such as: a) maintain a Community Liaison Coordinator position to work with communities throughout the Project and provide a grievance mechanism through which individuals can confidentially and independently raise issues should they arise. b) develop a Community Readiness program to support communities and businesses in assessing local capacity, identify critical gaps that would prevent community members from successfully gaining employment, and capture business and economic opportunities related to the Project. c) involving local communities in the development and implementation of monitoring programs could provide opportunities for employment during Construction to beyond the Decommissioning stage. Recommendations: - Denison needs to provide additional detail within the Final EIS related to Denison's commitment to developing mitigations that address potential effects to community well-being such as support for community accessible health and wellness programs, community liaisons, community readiness programs, and long-term monitoring opportunities. This includes mitigations that are prepared with MN-S, and NR1 and NR3 Locals involvement and agreement.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. Denison recognizes that both parents and members of the community/family could potentially be employed by the Project. Mitigation measures associated with potential effects to community cohesion and the commuter-rotation system are described in Section 12.1.5 and include: - Working 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, where practicable; - 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 (see Section 11 for a description of potential effects to land use). As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
514	MN-S (March 4, 2023)	Section 12.2.6.2.2 Community Cohesion	Issue #12-018: This analysis does not address the concerns expressed in the existing conditions reporting (section 12.2.3, p. 12-47 to 12-50) related to mental and physical health being affected by quality of water and land is being affected by industrial developments. This should be better reflected in the analysis of Community Cohesion. Recommendations: - Denison needs to provide additional effects analysis of "Change in Community Cohesion" that considers Project- related construction, operations, and decommission impacts to mental, physical, and cultural health that stem from a relationship with the environment. For example, concerns were expressed in the Draft EIS reporting (section 12.2.3) related to mental and physical health being affected by quality of water and land is being affected by industrial developments.	Denison acknowledges that there is an interrelationship between the two and for the purposes of the EIS ha been organized into separate sections. Section 11.1 provides an assessment on perceived suitability of lands and resources therein, along with human health. See Section 11.1.4, 11.1.5, and 11.1.6 for further information.
515	MN-S (March 4, 2023)	Section 12.2.6.2.2 Community Cohesion	Issue #12-019: This statement, and the existing conditions reporting, presents evidence that stress and related responses are a potential indirect effect of changes to employment and income that could be related to the Project. Recommendations: - Considering the uncertainty identified in the Draft EIS about social effects of the Project on community cohesion, Denison needs to provide additional detail within the Final EIS related to Denison's commitment to developing monitoring and management programs to understand and respond adaptively to potential effects of the Project on community cohesion. This includes monitoring and management programs prepared with MN-S, and NR1 and NR3 Locals involvement and agreement that could support community members dealing with use of alcohol/substances and/or related violence and crime.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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.

				Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
516	MN-S (March 4, 2023)	Section 12.2.8 Monitoring and Follow-up	Issue #12-020: This statement is vague about who will monitor community cohesion and whether Government departments and private- sector companies are committed to provide those services for the life of the Project. It also ignores previous statements in the Draft EIS that identify direct and indirect effects of uncertainty related to changes to community well-being that would be related to the Project. Denison's earlier statements indicate that monitoring and follow-up will be an aspect of mitigation. The statements seem contradictory. Recommendations: - Denison, in the Final EIS, needs to demonstrate that whether Government departments and private-sector companies are committed to provide community cohesion- related services for the life of the Project. - Denison needs to distinguish and clarify earlier statements of monitoring and follow- up with the assertion here.	Denison is committed to implementing measures within its control and responsibilities (for example the EFAP and other measures). As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. Monitoring of community cohesion at the community level is something Denison understands is for the Government to consider.
517,	MN-S (March 4, 2023)	Section 12.3.1.3.1 Spatial Boundaries	Issue #12-021: Contrary to the text describing the Traffic Study Area, Highway 914 and Highway 165 are not labelled on Figure 12.3-3. Recommendations: - MN-S request the revision of Figure 12.3-3 to include labelling of Highway 914 and Highway 165 in the Final EIS.	Please refer to Figure 12.3-4 which describes the location of the Project in relation to Highway 914 and 165.
518	MN-S (March 4, 2023)	Section 12.3.4.2.1 Potential Effect 1 – Change in Traffic	Issue #12-022: The 31% or 51% increase in truck traffic on Highway 914 seems to represent a more than slight increase in traffic volume. It is acknowledged that this is related to 18 additional trucks per day. Clarification is required to determine if there would be a similar % increase in potential collisions. Recommendations: - Denison needs to clarify and provide analysis of the impact of traffic volume and what is a suitable threshold.	Denison believes it has fulfilled its information requirements for the EIS and supporting documentation as outlined in the EA guidance provided by the province and federal government. Notwithstanding that, Denison recognizes that further information will be required as the project moves through the EA and licensing / permitting processes. Denison will work with the province to identify and scope additional information requirements.
519	MN-S (March 4, 2023)	Section 12.3.4.2.1 Potential Effect 1 – Change in Traffic	Issue #12-023: Clarity is required to explain why collisions can not be predicted with accuracy given the availability of existing predictive modelling for traffic management planning. Recommendations: - Denison should provide further clarification in the Final EIS of why collisions can not be predicted with accuracy given the availability of existing predictive modelling for traffic management planning.	To clarify, the text in Section 12.3.4.2.1. could have more specifically referenced accident rates as part the discussion of an increase in the number of collisions due to the Project. Overall, it is expected that accident rates will not be affected by the incremental increase in traffic associated with the Project. Traffic volume is a poor predictor of accident rates on relatively well traveled roads - that is, the accident rate does not show a direct relationship with traffic volume and is relatively consistent in this case. Extrapolating existing accident rates and specifically applying them to the Projects related traffic would provide some insight but it is understood that such extrapolation would be very conservative and overestimate the actual level of risk. Accident statistics are inclusive of all manner of accidents, the majority if which are single vehicle accidents that do not result in significant harm to people or property. Moreover, it would be expected that the likelihood of Project-related traffic accidents would occur at lower rates than those attributed to the general public based on the mitigations described in the draft EIS

				(Section 12.3.5) including: 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; 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; an Emergency Response Plan will be developed in case there is a spill during the transportation of dangerous goods and/or hazardous products; and 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. The above notwithstanding, Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward and as the Program / Plan / Procedure documentation is developed during licensing since elements of this documentation directly align with management of the aforementioned concerns (e.g., emergency response planning, transportation management planning).
520	MN-S (March 4, 2023)	Section 12.3.4.2.2 Potential Effect 2 – Change in Community Infrastructure and Services	Issue #12-024: Clarification is required to explain how Denison intends to provide employee maintenance support services that address the indirect effect to the community members (e.g., childcare, etc.) identified in this statement. Recommendations: - Denison to provide in the Final EIS additional detail on commitments to support employee families while on rotation.	Section 12.3.5 describes the mitigation measures applicable to community infrastructure and services within the LSA communities, the following mitigation measures will be implemented to reduce adverse effects: (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. (2) An EFAP will be part of each worker's benefits package and will provide supports to individuals and their families that may not be readily available in the communities. Employee and family assistance programs typically provide free assessments, short-term counselling, referrals, and follow-ups to employees and their family members who are having personal or work-related problems. Generally, EFAPs can be accessed remotely by workers and their immediate family. Denison will aim to educate their staff on the offerings of their EFAPs, as well as making that information shareable with individuals' families.
521	MN-S (March 4, 2023)	Section 12.3.4.2.2 Potential Effect 2 – Change in Community Infrastructure and Services	Issue #12-025: The services listed in Table 12.3-14 are predominately crisis management services and general health care services which are provided by existing organizations in the community/region. Clarification is required to identify the community services that Denison will make available to the families of local employees to address shift rotation issues (e.g., childcare services) and how Denison will help families with access these services. Recommendations: - Denison should clarify their commitment to providing provide community social services to the families of local employees to address issue identified in relation to the shift rotation (e.g., childcare services)	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.
522	MN-S (March 4, 2023)	Section 12.3.2 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment (p. 12-108)	Issue #12-026: Arrangements and applicable funding for a Métis Knowledge study is underway but not yet incorporated in the assessment. Recommendations: - Denison needs to include in the Final EIS, Métis Knowledge study findings on their perspectives on infrastructure and services.	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. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing

				adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
523	MN-S (March 4, 2023)	Section 12.3.4.2.2 Potential Effect 2 – Change in Community Infrastructure and Services	Issue #12-027 and 12-028: Clarification is required to indicate how the on-site programs would support community-based health services. Recommendations: - Denison to provide additional information of on-site health services that will alleviate community-based health services in NR1 and NR3. - Denison needs to confirm how social responsibility guidelines will support community infrastructure and services in NR1 and NR3 to help offset some of the interactions and effects to local communities and timelines for the action.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.
524	MN-S (March 4, 2023)	Section 12.3.5 Mitigation Measures	Issue #12-029: Most of the mitigations provided are standard worker health and safety and materials handling measures required for worker and environmental safety and don't address potential effects to traffic within the LSA. Detail is required to demonstrate how measures will address potential hazards from increased traffic volumes, and potential risk for conflict between road users and mining traffic. Recommendations: - Denison needs to provide additional information in the Final EIS on how the mitigation will alleviate traffic related impacts.	Denison believes the mitigations it has outlined for transportation management (and associated risks thereof) as detailed in the draft EIS (Section 12.3.5, Section 14, Appendix 14-A) are reasonable and practical measures it can take to manage it's Project activities. It is acknowledged that the information provided in the EIS and its supporting documentation is presented at a planning level; however, this level of detail is appropriate at this stage of Project development. Further details as to how these mitigations will be implemented will be developed during the licensing / permitting phase and will be available for review at that time, rather than as part of the final EIS. Further to this, and as noted elsewhere, Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward and as the Program / Plan / Procedure documentation is developed during licensing since elements of this documentation directly align with management of the aforementioned concerns (e.g., emergency response planning, transportation management planning). Mitigations in Section 12.3.5 also 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 which are understood to occur in September and October (dates may be adjusted at the communities' direction). 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 mitigation measures and monitoring plans.
525	MN-S (March 4, 2023)	Section 13.1.1 Valued Component Selection	Issue #13-001: This section of the draft EIS states: "Residents in the LSA and Regional Study Area (RSA) have expressed interest and concern about the Project's effect on the local economy, through income, training and employment opportunities, and business opportunities. Initial direction and input into VC selection was obtained from: - discussions with Indigenous and non-Indigenous Communities of Interest (COI); - discussions with LK holders; - discussions with government agencies and the public; - results of Denison's baseline studies; - regional data from other EAs; - results from engagement and consultation activity; and - similar or recent projects in the region." (p. 13-5 to 13-6) Recommendations:	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time.

			- In the Final EIS, Denison needs to include the input from MN-S, NR1 Locals, NR3 Locals and indicate if VCs were altered.	
526	MN-S (March 4, 2023)	Section 13.1.3.1 Spatial Boundaries	Issue #13-002: Denison has not included MN-S or NR1 and NR3 Métis communities in the LSA for the assessment of the economy. Recommendations: - Denison needs justify its selection of LSA communities and why no Indigenous Communities of Interest nearest to the site are not in the LSA. The omission calls into question any economic interests of Métis in close proximity to the Project could have. - In the Final EIS, Denison to expand its evaluation to Métis communities.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
527	MN-S (March 4, 2023)	Section 13.1.3.2 Temporal Boundaries	Issue #13-003: MN-S is interested in understanding all potential Project-related effects during Post-Decommissioning including economic impacts. Recommendations: - MN-S requests that in the Final EIS, Denison include the addition of interactions and effects analysis for Post- Decommissioning impacts to economics that may stem from Employment Income within the LSA communities related to monitoring and the implementation of management programs to respond adaptively to potential effects of the Project. This includes monitoring and management programs prepared with MN-S, NR1 Locals, and NR3 Locals involvement and agreement.	As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions. As the Project site will be self-sufficient in terms of meeting the needs of the Project and its workforce, the effects related to local communities are associated with the effects of participation in employment and the associated commuter rotation system. With the application of mitigation measures described in Section 12.3.5, and given the distance between communities in the LSA and the Project site, the residual adverse effects are expected to be low in magnitude The overall conclusion relative to changes to Infrastructure and Services is not significant.

528	MN-S (March 4, 2023)	Section 13.1.4 Influence of Indigenous Knowledge, Local Knowledge, and Engagement on the Assessment	Issue #13-004: Denison has not sufficiently engaged MN-S, NR1 communities, and NR3 communities on the assessment of the Economics VC. Recommendations: - Denison needs to meet with MN-S, NR1 Locals, and NR3 Locals to discuss Project- related economic issues and interests. - MN-S request additional detail is included within the Final EIS, on how the input provided by MN-S, NR1 Locals, and NR3 Locals will influence the assessment of the Economics VC.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. At the direction of the MN-S, Denison participated in meetings on February 12, 2023 with NR1 and on February 13, 2023 with NR3. The participants at these sessions were identified and invited by the MN-S. During these meetings, Denison shared information about the Project and the associated VCs assessed as part of the environmental assessment. No new VCs were identified as part of that discussion, and should new ones emerge through process, we would consider them at that time.
529	MN-S (March 4, 2023)	Section 13.2.1.2 Participation Rate	Issue #13-005: Denison has not assessed the participation rate, employment rate, or unemployment rate of MN-S or NR1 and NR3 communities. Recommendations: - In the Final EIS, Denison needs to expand the description of the existing environment to include NR1 communities and NR3 communities.	Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.
530	MN-S (March 4, 2023)	Section 13.2.1.3 Employment Rate	Issue #13-006: Denison acknowledges that several barriers to employment in northern Saskatchewan exist without providing solutions to address and/or mitigate such barriers. Recommendations: - Denison needs to provide more detail within the Final EIS related to their role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities.	Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project - such 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, including 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 Regional Study Area and then beyond the Regional Study Area. 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.
531	MN-S (March 4, 2023)	Section 13.2.3 Key Indicator: Traditional Economy	Issue #13-007: The Métis Knowledge study by MN-S has not been completed and included in the Draft EIS. Recommendations: - Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Metis Local #9 on potential Project-related effects to Métis traditional economy throughout the life of the Project. - The Final EIS needs to include the Métis Knowledge Study once completed.	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. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

532	MN-S (March 4, 2023)	Section 13.2.4.1 Local Businesses	Issue #13-008: The EIS states: "Economic leakage (i.e., money leaving the local economy) is a relevant concern, particularly for small, concentrated economies. Economic leakage can occur at various points through the cascade of spending in an economy, but the closer that leakage occurs to the point source of investment, the more potential economic benefit that is lost." (p. 13-51) Recommendations: - Denison needs to provide more certainty and detail within the Final EIS related to local employment and procurement mitigation to manage for and reduce 'economic leakage'.	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Section 13.4 Mitigation and Enhancement Measures also provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.
533	MN-S (March 4, 2023)	Section 13.3.1 Potential Interactions Between the Project and Valued Component / Key Indicators	Issue #13-009: Denison does not include MN-S or NR1 communities within the LSA in the assessment on the economy and therefore employment, training, and business opportunities will not be prioritized for all potentially impacted Métis. Recommendations: - Denison to include MN-S and all NR1 communities in the LSA for the economy VC in the Final EIS.	Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.
534	MN-S (March 4, 2023)	Section 13.3.1 Potential Interactions Between the Project and Valued Component / Key Indicators	Issue #13-010: Potential Project interactions for the Economy VC do not reflect feedback shared by MN-S/NR1 and NR3 Locals. Recommendations: - Denison needs to discuss potential Project interactions for economy to Métis peoples and update Table 13.3-1 to reflect feedback shared by MN-S/NR1 and NR3 Locals.	Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.
535	MN-S (March 4, 2023)	Section 13.3.2.1 Potential Effect 1 - Employment and Training	Issue #13-011: Denison has not included MN-S or NR1 and NR3 Métis communities in the LSA for the assessment of the economy. Denison also has not engaged MN-S or all potentially impacted NR1 and NR3 communities to understand Métis concerns and/or interests related to employment and training opportunities. Recommendations: - Denison needs to engage all potentially impacted Métis communities. Specifically, Denison should equally engage all NR1 and NR3 Locals in addition to Kineepik Metis Local #9 on interests and concerns related to employment and training opportunities throughout the life of the Project. - Denison needs to provide more detail within the Final EIS related to their role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities. This includes training programs prepared with MN-S/NR1 and NR3 Locals involvement and agreement.	Spatial boundaries for the Economy VC were selected to reflect the geographic areas where economic impacts from the Project are likely to be detectable and measurable. These impacts are expected to be driven primarily by the relationship and interactions between the Project and the COI. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project - such 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 Regional Study Area and then beyond the Regional Study Area.

536	MN-S (March 4, 2023)	Section 13.3.2.1 Potential Effect 1 - Employment and Training	Issue #13-012 and 13-013: Denison has not identified Métis-specific considerations to their employment and training program. Denison has indicated that there will in-house training, as well. It is not clear how this will be delivered. Recommendations: - Denison needs to provide more certainty and detail within the Final EIS related to local training and employment. More detail within the Final EIS related to Denison's role in developing and providing resources for training and employment as access has already been identified as a barrier to local communities. This includes training programs prepared with MN-S/NR1 and NR3 Locals involvement and agreement. - More information is needed to understand Denison's approach and commitment to addressing effects to local employment especially as it relates to Foundational positions and why a Grade 12 education is required. - Denison needs to update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA. - Denison needs to engage MN-S, NR1 Locals, and NR3 Locals to discuss employment and training opportunities for Métis (e.g., discussing Métis-specific recruitment strategies). Opportunities to discuss include (but are not limited to): hiring and training practices during all phases of the Project, on-the-job training and career counselling to help with advancement from foundational positions, advance sharing of job qualification requirements, clearly identifying training requirements and working with various training institutions to make sure such appropriate training is available, and creation of scholarship and support programs.	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. All positions at the Project will require a Grade 12 education or equivalent. Section 13.3.2.1 describes how foundational positions (i.e. entry level) require Grade 12 education and in-house training programs, although a combination of skills and experience may be considered. These positions would include process plant operators, site services, drillers, and catering/janitorial staff. Denison will update the Economics Section to reflect the latest census and the effects that Covid has had on employment in the LSA and RSA. Further, Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.
537	MN-S (March 4, 2023)	Section 13.3.2.2 Potential Effect 2 – Income	Issue #13-014: Initiating efforts with LSA communities excludes most of the Métis communities and keeps them from benefiting. Recommendations: - The Final EIS needs to include additional evaluation of non- LSA communities potential for income benefits.	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Section 13.4 Mitigation and Enhancement Measures also provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.
538	MN-S (March 4, 2023)	Section 13.3.2.3 Potential Effect 3 - Traditional Economy	Issue #13-015: Denison has not incorporated Métis Knowledge from MN-S, NR1, or NR3 (except Métis Knowledge from Kineepik). Recommendations: - Denison will need to revise the potential effects evaluation after completion of the MKS.	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. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

539	MN-S (March 4, 2023)	Section 13.3.2.3 Potential Effect 3 - Traditional Economy	Issue #13-016: Denison has not included details on closure planning including traditional economic activities that can be expected upon decommissioning. Recommendations: In the Final EIS, Denison needs to provide additional information on closure planning and what traditional economic activities can be expected upon decommissioning.	The draft EIS includes the Project's Conceptual Decommissioning Plan (CDP) (see Section 2.2.3). As the name implies the decommissioning plan for the site is presented at a relatively high level commensurate with the stage of Project development, including consideration of physical decommissioning activities and reclamation (or restoration) activities. With specific reference to reclamation / restoration the draft EIS notes that disturbed areas would be returned to become a self-sustaining and viable wildlife habitat, but little further detail is provided at this early stage. That detail will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. Denison noted the MN-S interest in how traditional economic activities can be integrated into the decommissioning plan and such considerations can be made as the plan evolves. Denison is committed to continued engagement with the MN-S at their direction, inclusive of engagement in NR1 and NR3, and within that context expects that integration of traditional economic activities within the context of site decommissioning will be part of those discussions.
540	MN-S (March 4, 2023)	Section 13.3.2.3 Potential Effect 3 - Traditional Economy	Issue #13-017: Denison has not engaged MN-S, NR1, and NR3 to understand Métis-specific effects of the Project's proposed commuter-rotation schedule. Recommendations: (1) In the Final EIS, Denison needs to provide more detail related to worker rotation system mitigation. Particularly considering the identification of reported difficulty in balancing the demands of a worker rotation system with traditional economy activities.	Denison acknowledges the concern raised regarding participation in the traditional economy related to working at an industrial operation. Participation in the worker rotation system would present similar challenges as those described in the Métis Knowledge Study Report which describes how people's ability to go out on the land is challenged by work schedules generally and the busyness of the modern world. Mitigation offered for other VCs would equally apply to an individual's ability to continue to participate in culturally important activities, such as: - working 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; and - implementation of Denison's Indigenous Peoples Policy and advancement of reconciliation; Other uranium operations in northern Saskatchewan have show that using a commuter rotation system has been effective in allowing Indigenous employees continued opportunities to spend time on the land, which similarly supports the traditional economy. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3, and within that context expects that the concerns raised by the review comment will be part of those discussions.
541	MN-S (March 4, 2023)	Section 13.3.2.3 Potential Effect 3 - Traditional Economy	Issue #13-018: As identified in section 11.1.6 (p. 11-66 to 11-68), Indigenous land use may be affected by the Project despite mitigations. It is reported that Project-related effects such as noise and dust can cause avoidance of the area by some resource harvesters while others may be undeterred. Recommendations: (1) Denison needs to include in the Final EIS, information provided by Métis in NR1 and NR3 once the MKS is completed. (2) Denison needs to support Métis training opportunities through Northlands College.	Section 13.4 Mitigation and Enhancement Measures provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project - such 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, including 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 Regional Study Area and then beyond the Regional Study Area. 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.

542	MN-S (March 4, 2023)	Section 13.4 Mitigation and Enhancement Measures	Issue #13-019: Limited listing of potential measures for consideration. Recommendations: (1) It is unclear from the description of Mitigation and Enhancement Measures whether Impact and Benefit Agreements (IBAs) will be included. Impact and Benefit Agreements are a normal vehicle for extending economic benefits to Indigenous communities. (2) In the Final EIS, confirm whether IBAs are also a mitigation and enhancement measure.	Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in Section 13.3.2.1 of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. Section 13.4 Mitigation and Enhancement Measures also provides details on Denison's Human Resource Development Plan, which will initially prioritize Indigenous and non-Indigenous communities in the Local Study Area in terms of employment and training opportunities and will work with the leadership of these communities to assist in determining hiring and training practices during all phases of the Project, priority for employment and training will then focus on Indigenous and non-Indigenous residents of the Regional Study Area and then beyond the Regional Study Area.
543	MN-S (March 4, 2023)	Section 13.4 Mitigation and Enhancement Measures	Issue #13-20: Denison has not engaged MN-S or all NR1 Locals and NR3 Locals to understand employment and training needs to support Métis involvement in the Project. Recommendations: Denison indicated multiple pick-up points but a minimum of 3 points (2 in the LSA and 1 in Saskatoon). In the Final EIS, Denison needs to clarify if pick-up points will be extended to the RSA communities so that they can take advantage of employment opportunities.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
544	MN-S (March 4, 2023)	Section 13.5.1.1 Employment and Training	Issue #13-021: Denison has not identified mitigation and enhancement measures to support their conclusion that employment and training residual effects are expected to be low to moderate in magnitude. Recommendations: (1) Denison needs to expand its description of mitigation and enhancement measures to better support their conclusion that employment and training residual effects that are low to moderate in magnitude in Section 13.5.	Denison recognizes that there is a need for and will be an annual evaluation of outcomes. The residual effect on employment and training during Construction, Operation, and Decommissioning is expected to be positive. Positive effects are expected to occur primarily in the LSA and RSA but are also expected to extend beyond the RSA as the labour demands of the Project are unlikely to be met with local resources only. Effects associated with employment are expected to occur continuously through each Project phase, while it is anticipated that training efforts will be focused largely during the operational phase (although some initiatives may be in place prior to the onset of Operation to maximize opportunities). Effects will be reversed after Decommissioning is completed; however, individuals who benefits from employment and training will have skills to carry forward to future opportunities. Section 13.5 describes the mitigation and enhancement measures for economy, including those specific to education and training: • 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. • Denison will plan a workforce transition plan prior to Decommissioning of the mine. • Denison will negotiate with the Province of Saskatchewan to develop the Project's SLA and the Human Resource Development Agreement, which will outline measures in relation to socio-economic parameters related to the Project.
545	MN-S (March 4, 2023)	Section 13.6.1 Climate Change Considerations	Issue #13-022: Denison did not identify how the Métis would be involved in the development, review, and/or implementation of the Project's detailed plans and procedures. Recommendations: (1) The Final EIS needs to include the detailed plans and procedures for review. (2) The plans and procedures need to include input from MN-S, and NR1 and NR3 Locals.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.
546	MN-S (March 4, 2023)	Section 15.5.3 Effects on the Project	Issue #15-001: Meeting current regulations and building codes may not be sufficient for short-term or long-term environmental effects as they are characterized in the Draft EIS (e.g., forest fires, flooding). Please provide detail on how the Project will be designed to exceed current regulations in anticipation of changing to environmental conditions. Recommendations: - Denison needs to provide additional detail in the Final EIS describing how the Project will be designed beyond current regulations and building codes in anticipation of changes to environmental conditions.	From an operations perspective the current mine design is sufficiently robust such that changes in environmental conditions that may be expected, such as increased precipitation event intensity, over the operational life of the mine can be accommodated. For example, the design basis for water management infrastructure far exceeds standard design basis. The following is noted regarding the design basis for water management infrastructure for reference. The probable maximum precipitation (PMP) value of 493 mm selected for design of water management infrastructure, such as ponds, is similar to total annual precipitation (456 mm from Key Lake station, and 483 mm from 1981-2020 climate normals). The selected PMP is well above (>5 times higher): 1) current/measured 24-hour maximum precipitation, 2) modelled 1 in 100 year 24-hour return for current conditions, 3) modelled 1:100 year 24 hour return for a future (2020-2050) period, 4) the predicted maximum 1-day precipitation under different emissions scenarios for the future (including RCP8.5 in the 2021-2050 period). Design basis to accommodate environmental change over the longer term is a factor that will be considered as it pertains to decommissioning. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS, and are presented at a relatively high level commensurate with the stage of Project development. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. As the decommissioning plan becomes more specific and granular it is expected that the design basis will become more detailed. Denison is committed to and will factor in longer term considerations of environment and climate within the evolution of the decommissioning plan,

				and in particular as it concerns how changes in environment and climate could affect decommissioning and restoration goals.
547	MN-S (March 4, 2023)	Section 15.5.3 Effects on the Project	Issue #15-002: Further details are required on how emergency preparedness and response plans will adaptively respond to changing climatic conditions and potential unforeseen effects to the Project. Recommendations: - Denison needs to provide additional detail in the Final EIS about their commitment to developed adaptive emergency preparedness and response plans to address unforeseen effects to the Project resulting from climate change.	Section 2.9.1.3.5 of the draft EIS provides the commitment to develop an Emergency Preparedness and Response Program (EPRP). The EPRP would be established 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. The EPRP would be developed in a manner that aligns with guidance provided by CNSC in REGDOC-2.10.1. As noted on the draft EIS, Denison has opted to execute the overall Project approvals process - that is, the environmental assessment and licensing / permitting processes - in series and not simultaneously. As such, the documentation will be developed during the licensing / permitting phase and will be available for review at that time rather than as part of the final EIS. The level of information provided in the draft EIS is appropriate for the stage at which the overall Project approvals process currently sits, and as noted, MN-S and others, will have an opportunity to review documentation that is developed at later stages of the overall approvals process as appropriate. It is confirmed that the EPRP will include provision for change management and an explanation as to how change management will occur. The EPRP will be a living document that will be reviewed regularly and updated as needed - such updates may be required for a myriad of reasons including those related to climate change as noted by the review comment.
548	MN-S (March 4, 2023)	Appendix 2-A 19-EN-CNSC-1.23, Workshop, 2018-01-16	Issue #2A-001: The site tour on January 16, 2018 only included the following Métis representation: A La Baie Métis Local #21, Kineepik Métis Local #9, MN-S, and Patuanak Métis Local #82. In addition, other Indigenous Nations were present. It is unclear from Denison's table format who asked how long to freeze and would the freeze wall be kept intact for the life of the operation. Denison shared responses to these questions in their Draft EIS. Recommendations: - Engagement on the proposed Project needs to extend to NR1 communities. The Final EIS should include proof of this engagement and responses to concerns raised.	Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS. For the purposes of the organization of the EIS, such organizations as the MN-S and YNLR are understood as organizations. 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. Section 12.2.4.2.1 describes that multiple pick-up points for workers will be determined as part of Project design, including additional locations to be determined relative to eligible labour force supply. As noted in the draft EIS, Section 8.2.9 "Specific follow-up and monitoring plans will be prepared to refine and finalize approach in consultation with Indigenous groups, other interested parties, and relevant federal and provincial agencies with interest in the development and implementation of this VC specific program." MN-S will be informed throughout the monitoring program design and implementation process. Monitoring program design and implementation will be guided by the following principles: meet regulatory requirements, confirm the effectiveness of mitigation measures and predictions made in the assessment, implementing adaptive management (if/where applicable) to reduce effects during the lifetime of the Project, and will ensure that spatial boundaries are sufficiently extensive to measure EIS predictions.

549	MN-S (March 4, 2023)	Appendix 2-A 22-EN-EQC-648.1, Presentation, 2022-03-03	Issue #2A-002:These meetings had representation from Métis Local #39 (La Loche) and no other Métis. It is unclear who asked, "What are the concerns with groundwater monitoring...". MN-S does not consider Denison's engagement with the EQC as engagement with MN-S or Métis communities. MN-S prefers Denison specify feedback shared at join workshops by Indigenous Nation. Recommendations: - Denison engagement with Métis communities has been limited. In the Final EIS, MN-S expects to see more informed engagement and responses to concerns raised.	Thanks and noted. Denison continues to engage with the MN-S at their direction, inclusive of engagement in NR1 and NR3. Denison understands the MN-S is a governing body of the Métis Citizens in Saskatchewan and recognizes that communities the MN-S governs may be included as a COI and are recognized as such in the EIS.
550	MN-S (March 4, 2023)	Appendix 7-C, Numerical Modelling: Post-decommissioning Evaluation, Executive Summary	Issue #7C-001: Page ii of this document states states: ""By accounting for these reactions, the simulated dissolved constituent plumes emanating from the ore zone reach their maximum extents within the deeper units (i.e., Lower Sandstone Aquifer and deeper parts of the Desilicified Zone) after approximately 10,000 years. Consequently, concentrations at Whitefish Lake throughout the future centuries are simulated to be similar to background concentrations. Under the base case scenario, which represents a conservative estimate of the conditions present, there are no exceedances of the groundwater quality screening criteria protective of freshwater aquatic life in the receiving environment." Whether conditions are "conservative" or not, is dependent on perspective. Recommendations: - Denison needs to provide further rationale detailing how the "base case scenario" represents a conservative estimate of the conditions present.	It is acknowledged that additional details could have been added to the Appendix 7-C Executive Summary to provide more fulsome context for the comment that the "base case scenario" is conservative. The basis for this statement was the robust data set of subsurface geochemistry that supported the assumptions in the model with respect to concentrations of sorbing mineral phases and the uncertainty analysis that was performed. The uncertainty analysis evaluated the potential that conditions at the base case were not adequately conservative. The uncertainty analysis is detailed in Section 4.7 of the report. This included increasing the mass of chemical constituents of potential concern (COPCs) within the source (mining area), increasing the hydraulic conductivity of key zone and/or hydrostratigraphic units, decreasing the number of reactive sites for sorption of COPCs, removing some sorbent phases altogether from key hydrostratigraphic units, and other scenarios focused on geochemical and hydrolaugic uncertainties. Altogether, there were 15 uncertainty scenarios tested in addition to the base case. For the base case, and all uncertainty scenarios, no exceedances of ground water quality screening criteria were generated at Whitefish Lake into the future (i.e. over the "future centuries" period), apart from those that reflect natural conditions. The results are provided in detail in Sections 4.6.6 and 4.7.1 of Appendix 7-C and the consistency of the uncertainty results with the base case affirms that the base case simulation is appropriate for decision-making.
551	MN-S (March 4, 2023)	Appendix 7-C, Numerical Modelling: Post-decommissioning Evaluation, Executive Summary	Issue #7C-001: Denison provides no rationale for "conservative dispersivity values" in the Draft EIS. Recommendations: - Denison needs to provide site-specific research to confirm literature dispersivity values are conservative in the Final EIS.	Site-specific research, as understood from the comment, would require a natural gradient tracer test over the distances of interest (> 1 km). Such testing would take centuries, and therefore is not practical. For this reason, use of literature dispersivities is standard practice.
552	MN-S (March 4, 2023)	Appendix 7-C, Numerical Modelling: Post-decommissioning Evaluation, Executive Summary	Issue #7C-001: Additional modelling will be needed to confirm at the time of decommissioning the assumption that there is "large assimilative capacity" of the groundwater system, in order to manage risk in Whitefish Lake. Recommendations: - Denison to complete simulations that increase focus on maintaining containment of the contaminant source for a greater period of time (i.e., a higher level of focus on source term control and flushing), and less reliance on management of contaminant along the pathway, prior to the contaminant reaching the receptor. In other words, simulations that focus, to a greater extent, on evaluating the benefit of additional effort and time on source term control (the first step in the risk hierarchy of source, pathway, receptor).	The comment is noted and it is Denison's intent to continue to evaluate what is reasonably achievable with respect to remediation of the mining zone water quality prior to discontinuation of containment measures. After 30+ years of monitoring we will be in a better position to update predictions and have enhanced confidence in the assimilative capacity. Flushing of the source zone is part of the planned remedy and would only be stopped once the target level of remediation has been achieved. Beyond that flushing period (which may take years), if conditions indicate additional long-term source control is required, then Denison may have to do that, but our current understanding suggests long-term source control is not needed so long as the flushing is able to reduce source concentrations to the target amounts. Lab testing suggests the proposed flushing will be effective at reducing concentrations to the target values. Additionally, we note that refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has

				been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances.
553	MN-S (March 4, 2023)	Appendix 7-C, Numerical Modelling: Post-decommissioning Evaluation, 2.4 Scope of Work	Issue #7C-001: Denison assumes non-surface reaching groundwater will not extracted or accessed by future generations. Recommendations: - Denison to study and provide further understanding of deep groundwater characteristics with MN-S, NR1 Locals, and NR3 Locals prior to commencement of mining operations. This information may affect final closure options. - Denison to consider modelling for surface receptors of deep groundwater beyond the boundaries identified in Section 1.1.	Denison did complete engagement with Interested Parties, including Indigenous Communities of Interest and it is based on that engagement that it is understood deep groundwater use does not presently occur, nor is expected to in the future. Further, impacted groundwater is 100's of meters below ground surface, which is far below what would be needed for a future water supply as the flow through the shallower aquifer is far greater than through the deep aquifer. During operations, Denison will continue and expand groundwater monitoring to ensure that current study findings are realistic. Modelling simulations report the highest levels of predicted discharge to surface water - any discharge to more distant surface water bodies would be at even further reduced concentrations. Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time.
554	MN-S (March 4, 2023)	Appendix 7-C, Numerical Modelling: Post-decommissioning Evaluation 2.4.1 Groundwater Recharge	Issue #7C-001: Denison's Draft EIS does not confirm if the groundwater recharge rates were adjusted for potential changes to recharge as a result of climate change. Recommendations: - Denison should develop a Project-specific climate change model database, which clearly articulates the shared socioeconomic pathway (SSP) the Project is choosing from IPCC AR6, and show how that scenario has been down- scaled for use within Project modelling predictions, and present the results in the Final EIS.	A qualitative and quantitative assessment of climate change and groundwater and surface water is provided: The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early fall, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late fall, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late-century periods. If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure. Section 8.1.3.4 (and Appendix 8-C) provides a quantitative assessment of the potential changes in surface water quantity due to climate change. The 1:100 year, 24-hour return period rainfall events for the baseline and climate change influenced IDF curves are 79.9 mm and 88.6 mm, respectively. The PMP for the Project is estimated to be 493 mm (refer to IR-15 and AD-15) which is well above both 24-hour maximum precipitation and 1:100, 24 hour return precipitation events. The PMP is very conservative (e.g., assumes effectively a full year of precipitation in one event) under both existing and future conditions (climate change). The potential impacts of climate change to precipitation and therefore flows was summarized in Appendix 6-C, Table 10 with the total annual precipitation and the maximum 1-day events being variable over the next four decades (Table 1). Regardless, the climate change scenario indicates a potential increase in event based assimilative capacity in the receiving environment. TABLE 1- Existing and Predicted Precipitation Data for Key Lake (provided in EIS, Appendix 6- C, Table 10).

				To mitigate the potential for unplanned release of deleterious substances into the surface water environment even during the next 40 years of climate change, the PMP of 493 mm was used for water management engineering designs. During a PMP, water requiring management will report to the wellfield runoff pond which will be sized to accommodate a PMP event at the site. This pond has been sized to 38,200 m3 (excluding a freeboard of 1 meter). From the wellfield runoff pond, water will then be sent to the process water pond for treatment if required. In Section 2.8 Project Design Features, Denison notes that "Ponds will be designed to maintain a minimum freeboard of at least 1.0 m to allow for continued functioning during a probable maximum precipitation (PMP) event." As such, the project has been designed to manage water during PMP and greater, and therefore mitigation of potential impacts to water quality due to climate change has been initially included as part of the EIS. As a result, it is Denison's opinion that a quantitative assessment of potential impacts to surface water quality is not warranted as it is likely to indicate improved results from the conservative assessment of potential water quality changes during operation and decommissioning phases. Continued monitoring of background, effluent and receiver water quality will be undertaken and provide the ability for adaptive management throughout the life of the mine in association with potential climatic changes to the local and regional area. As a result the continued technical review until October 2024, Denison has made the following commitment: Denison will conduct a sensitivity analysis of low flows and high flows to assess how low and high flows may change under future climate conditions and the potential implications on water quality predictions made during the EA phase.
555	MN-S (March 4, 2023)	Appendix 7-C 2.4.2 Surface Water Features	Issue #7C-001: Water levels in surface water features are not static; they change in response to regional climate and flow conditions. This would influence the interaction between groundwater and surface water, as the assumption by the model developer is that water levels are input as static head boundary conditions. Recommendations: - Denison needs to explain in the Final EIS why static head boundary conditions are used for the modelling beyond a need to simplify the modelling.	Water levels within surface water bodies were monitored over several years. The range of observed water levels at Whitefish Lake (SA-6) during 2016-2018 was 499.5 to 500.2 m ASL, with an average of 500.1 m ASL; as such the value assigned in the model (500.0) is an accurate (and slightly conservative) reflection of the average water level observed. What is important is the hydraulic head difference over the 300-year (or more) transport travel time. Recognizing that future conditions could be different by as much as 2 m (i.e., the depth of Whitefish Lake), this range of water level could be tested.
556	MN-S (March 4, 2023)	Appendix 7-C 2.5.2.1 Water Level Elevations – Quantitative Calibration	Issue #7C-001: Denison does not provide the basis, explanation, or literature to state that a calibrated model to observe water levels is sufficient with a deviation of +/- 2m. Recommendations: - Denison needs to provide an explanation, basis, and/or literature to state that a calibrated model to observe water levels is sufficient with a deviation of +/- 2m in the Final EIS.	The mean residual is 0.23 m, not 2 m as inferred. The 2 m guidelines are merely presented for reference. The literature is quoted regarding the goodness of fit parameter NRMS, which is normalized so that it can be applied to any model. The NRMS achieved within the Denison model is 4.1%, whereas the literature (Spitz and Moreno) recommend 10% or less. As such the model is considered calibrated by literature standards. The qualitative term "excellent match" is based on 30-years of experience in developing 100's of similar numerical groundwater flow models.
557	MN-S (March 4, 2023)	Appendix 7-C 2.5.2.3 Statistical Measures of Calibration to Water Levels	Issue #7C-001: Denison provides no rationale/basis for considering a mean error of 0.23 considered to be an "excellent match" to the observed water levels. Recommendations: - Denison should provide an explanation, basis, and/or literature for why a mean error of 0.23 is considered to be an "excellent match" to the observed water levels in the Final EIS.	The mean residual is 0.23 m, not 2 m as inferred. The 2 m guidelines are merely presented for reference. The literature is quoted regarding the goodness of fit parameter NRMS, which is normalized so that it can be applied to any model. The NRMS achieved within the Denison model is 4.1%, whereas the literature (Spitz and Moreno) recommend 10% or less. As such the model is considered calibrated by literature standards. The qualitative term "excellent match" is based on 30-years of experience in developing 100's of similar numerical groundwater flow models.

558	MN-S (March 4, 2023)	Appendix 7-C 2.6.3 Groundwater Flow Quantity	Issue #7C-001: Ecological receptors could potentially be exposed to groundwater flows. Recommendations: - Denison should provide an understanding of deep groundwater as a contaminant pathway to ecological receptors within immediate vicinity in the Final EIS.	Denison and its SMEs believe that this (i.e., what is referenced in the review comments) is what has been done (and presented in the report) by evaluating groundwater flow to a small portion of Whitefish Lake. At other locations (e.g., the edges of the Lake), shallow groundwater will be discharging, which has not come into contact with the deeper groundwater.
559	MN-S (March 4, 2023)	Appendix 7-C 2.7.1 Groundwater Demand	Issue #7C-001: The Project has assumed that it is "conservative" to supply all water for the Project from outside the ore zone, and assume minimal influent from re-cycled / treated water. This statement supports that position. Recommendations: - Denison should provide simulations that maximize recycling treated water, rather than minimize using recycled water for the Project. - Denison to confirm how groundwater quality predictions differ when recycled and treated water is used to supply water to the Project, as compared to assuming conditions as noted in this statement.	With respect to the first bullet: It is believed that the analysis completed is appropriate given that it represents a conservative (i.e., protective) means by which to assess the activities potential effects. The scenarios / simulations referenced in the review comment therefore are bounded by the conservative water supply assessment as it concerns potential Project effects to groundwater quantity. Denison concurs with the idea that it would be beneficial to maximize recycling of water and will strive to do so; however, this is more of an operational consideration. As outlines in draft EIS Section 2.2.3, Denison intends to recycle process water to the greatest extent possible, thereby reducing the demand for fresh water supply and volume of treated effluent. In an effort to develop a conservative assessment basis for the EA, the water recycle flows from the industrial wastewater treatment plant back into the processing plant and wellfield have not been incorporated into the estimates for freshwater withdrawal and treated effluent discharge. An overview of the site water balance during Construction, Operation, and Decommissioning are provided in draft EIS Figure 2.2-14, Figure 2.2-15, and Figure 2.2-16, respectively. These figures provide a summary of the water needs for certain Project activities, plans for water treatment (both potable and wastewater), and the general flow of managed water at the site. The estimated flows in the site water balances do not account for water recycle back into the processing plant and wellfield. This results in a conservative estimate of both freshwater withdrawal needs and treated effluent discharge rates. With respect to the second bullet point: Under the modelled scenarios, in which water is withdrawn from three water supply wells, the shallow groundwater system is simulated to recover very quickly following the cessation of decommissioning. Thus, the taking of shallow groundwater during Operations and Decommissioning will not influence the overall transport of potential contaminants in Post-Decommissioning after the containment (including the freeze wall) is removed. In addition, it should be recognized that if less water is withdrawn from the shallow bedrock for Operation, that additional groundwater left in the flow system will naturally act to further dilute any concentrations reaching the shallow aquifer and surface water receptors. That is why we feel the simulations presented are conservative.
560	MN-S (March 4, 2023)	Appendix 7-C 2.7.3 Hydrogeological Change Due to Mine Operations	Issue #7C-001: The interaction of increase drought or increased precipitation (i.e., climate change) could potentially affect the length of time for full recovery of groundwater recharge due to potential changes in climate conditions. Recommendations: - MN-S requests that interaction between climate change scenarios and groundwater modelling should be included in the Final EIS.	The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early all, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late all, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late-century periods. If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure. The groundwater model will be updated over the course of mine life to among other things support the decommissioning plan that will consider recovery in the mining zone. Such model

				scenarios would incorporate up to date information with respect to climate change and the potential effects of climate change on the groundwater environment.
561	MN-S (March 4, 2023)	Appendix 7-C 2.7.3 Hydrogeological Change Due to Mine Operations	Issue #7C-001: It is unclear if the statements made about full recovery and 90% recovery are defendable given that calibrated hydraulic conductivity values, as shown in Table 2-2 (p. 2.7), for the lower sandstone aquifer ranges over 2 orders of magnitude, and the ore zone calibrated hydraulic conductivity over nearly 5 orders of magnitude, and that no range in hydraulic conductivity is reported for the desilicified sandstone aquifer (i.e., a single calibration value is reported). Recommendations: - Denison should provide simulations that consider the full range of calibrated hydraulic conductivity values in the Final EIS.	The calibrated hydraulic conductivity values are consistent with observed data. The calibrated K value for the intermediate aquitard was 1x10-8 m/s, which is in the middle of the range of values reported from point testing within this unit (Range: 10-10 to 3.8x10-6 m/s), and similar to the geomean value (8.4 x10-9 m/s). Thus, the calibrated K value is within a factor of 1.2 of, and higher than, the geomean value. The hydraulic conductivity value for the Intermediate Aquitard is similar to that applied by AECL at Cigar Lake (5x10-8 m/s). Similarly, the K values applied for the Upper and Lower Sandstone Aquifer units are consistent with the field measured values, particularly for this fractured rock environment. The high end of the packer tested range of K values varied by 2 orders of magnitude between the aquifer and aquitard units, which is consistent with the definition of aquifer / aquitard differentiation. The interpretation of an aquifer-aquitard-aquifer sequence is consistent with the AECL interpretation of the Athabasca Sandstone at the Cigar Lake mine. When packer testing in fractured rock, the hydraulic conductivity associated with any test depends on whether the packed zone contains a continuous fracture set. However, for the unit as a whole, it is important that the model represent the hydraulic conductivity (or transmissivity) representative of the interconnected fracture network. Thus, it is appropriate that the applied hydraulic conductivity values within the aquifers are consistent with the higher end of tested conductivity values within those units. Within aquitard units, having singular higher conductivity fracture values from packer tests that test local fractures only, does not necessarily indicate large-scale transmissivity. A fault feature is suspected along the western perimeter of the Lower Sandstone Aquifer near Kratchkowsky and Williams Lake, located 1.5 km west of the mine site (also as depicted on the Hydrogeological Conceptual Site Model). This feature was interpreted to exist based on the similarity in groundwater levels between deep and shallow aquifers in that particular area (c.f., water levels along the creek south of Williams Lake and within GWR-029, as well as water levels recorded in open boreholes near Kratchkowsky Lake), as well as geochemistry in GWR-029. The geochemistry and water levels show in the vicinity of GWR-029 are different, however, than conditions within the Lower Sandstone aquifer further east of this area, above and east of the Phoenix deposit. The effect of the fault feature along the western edge of the Lower Sandstone aquifer was incorporated within the numerical model both through enhanced hydraulic conductivity parameters, as required to match observed water levels, and boundary conditions applied to introduce as much inflowing water to the Lower Sandstone Aquifer as the water level data suggest is reasonable. As a result of the continued technical review until October 2024, Denison will do additional sampling and characterization of the desilicified zone to support the post operation transport model.

562	MN-S (March 4, 2023)	Appendix 7-C 3.1.1 Groundwater Remediation	Issue #7C-001: No time period is provided to reach acceptable levels of remaining contaminants or effective remediation accomplished in order to leave the area in a pre- mining condition. Recommendations: - Denison needs to provide more clarity on what the expected time period to reach acceptable levels of remaining contaminants or effective remediation in order to leave the area in a pre-mining condition. This unknown time frame may play into the viability of remediation and final closure costing.	Groundwater remediation targets provided in the draft EIS were from derived from metallurgical test results completed from 2017 to 2021 with over 125 kg of material recovered from Phoenix deposit that underwent leaching and neutralization test work (see response to IR-67). In 2022 and 2023, metallurgical test work continued to further optimize remediation and strategies and confirm test work results presented in the draft EIS. It is expected that metallurgical test work will continue in the future to further optimize remediation targets, and this will be advanced through updates to the Decommissioning Plan. The Feasibility Field Test (FFT) provided additional confirmation that pH target and remediation targets could be met. Data gathered during the neutralization phase of the FFT provide confidence that groundwater targets proposed in the draft EIS can be met technically and economically. Based on laboratory testing and the results of the 2022 field testing, subsurface remediation is planned to consist of rinsing the ore zone with 35 pore volumes of fresh water, slowly raising the pH and then pumping about 75 pore volumes of basic solution through the same portion of the ore zone. This basic solution will in effect further raise the pH to a level that impedes further leaching of the deposit and reduces aqueous concentrations of contaminants of concern to below their environmental target levels. Refinement of the mining area decommissioning objectives and associated modelling will be done as the Project progresses through updates to the Decommissioning Plan; nevertheless, the objectives as they may evolve will be bound by the objectives evaluated in the EIS, which as shown are protective of aquatic biota in Whitefish Lake. The final acceptable mining area decommissioning objectives will be developed prior to initiation of groundwater remediation, as part of the Detailed Decommissioning Plan (DDP). Prior to executing decommissioning activities, Denison shall prepare and submit the DDP to regulators for acceptance. In this case the DDP would reflect input that will be solicited from Indigenous Nations and communities and others prior to its submission and would also be informed by conditions on the ground at the site at that time, operational experience that has been gained and the regulatory landscape at that time. As is highlighted above, the decommissioning plan will evolve over time and the plan will become more refined as the Project advances. As the Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, Denison has committed to collaborating with English River First Nation and Kineepik Métis Local on a monitoring regime, suited to each of their interests and needs. As part of these programs, Denison and the Indigenous community of ERFN and KML will be sharing information in an agreed-upon fashion. It is expected that the data collected through such monitoring regimes as described above would also be relevant to other Indigenous nations who may have interest in the Project.
563	MN-S (March 4, 2023)	Appendix 7-C 5.2.2 Assumptions	Issue #7C-001: Climate change as a variable does not appear to have been incorporated into the modelling. Recommendations: - Denison needs to provide more clarity in the Final EIS on how climate change as a variable has been incorporated into the ground water modelling as climate changes scenarios and effects on the groundwater could affect the closure pathway.	The experience of the Project team regarding studies of climate change and the impacts on groundwater at other sites generally shows a range of potential positive and offsetting negative impacts. While warmer temperatures will lead to extended periods of summer drought conditions extending into early all, warmer winters are predicted as well, resulting in less snowpack accumulation, more frequent snowmelt events, and more frequent rainfall during periods when evapotranspiration is negligible. These warmer winter conditions are often simulated to produce enhanced groundwater recharge during late all, winter, and early spring conditions. In particular, the lack of enhanced snowpack is simulated to result in less severe spring run-off conditions, indicating that more of the winter precipitation that falls will infiltrate. Overall, this is anticipated to result in enhanced groundwater recharge in the mid- to late-century periods. If, however, lower groundwater recharge was to result from climate change, it would reduce the groundwater driving force for mass transport of mining related fluids, and reduce mass loading to receiving water bodies such as Whitefish Lake. In other words, lower groundwater recharge resulting from higher evapotranspiration would result in slower mass transport to the receiving water bodies, reducing the risk of exposure. The groundwater model will be updated over the course of mine life to among other things support the decommissioning plan that will consider recovery in the mining zone. Such model scenarios would incorporate up to date information with respect to climate change and the potential effects of climate change on the groundwater environment.

564	Prince Albert Grand Council (PAGC) (March 6, 2023)	General Comments	Overall Comments from the PAGC submission: The EIS does not address multiple issues related to ecosystems, human health, and the long-term sustainability of the Wheeler River project, particularly Indigenous concerns regarding the loss of caribou, wolverine and other culturally significant animals. There are no details on economic benefits from the mines through Indigenous partnerships, including equity-based participation in the workforce with training opportunities for Indigenous personnel to operate in management roles. [Additional questions on this topic directed to regulators or government entities are included in the CNSC table]	The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares. A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations. The Wildlife LSA was designed to capture the majority of the Project effects. The Wildlife LSA extends beyond the Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. Further the Local Study Area for Indigenous Land and Resource Use (Section 11.1) is defined as the Project footprint plus the maximum combined extents of the supporting Valued Components for the Regional Study Area for aquatic, terrestrial, noise, and health as these components can affect the Indigenous resource use environment to ensure that all possible effects to resources were considered. Section 9 describes how consideration of potential effects to wildlife and wildlife habitat are considered within the EIS. In regard to caribou, Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment. Denison utilized Traditional Knowledge provided by Indigenous communities in the assessment and in the development of the Plan. A Human Health Risk Assessment (HHRA) was undertaken for the Project in Section 10. The HHRA evaluated direct exposure to constituents of potential concern (or contaminants) released to air and water, and through indirect exposure to the constituents associated with soil, sediment, and food, such as fish, wildlife, and plants. The assessment was inclusive of information based on use of traditional foods. The overall conclusion of the HHRA was that there would be no significant adverse effects to human health from the Project. Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP. 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 with 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.
565	PAGC (March 6, 2023)	Loss of Use and Access to Traditional Lands and Resources	The EIS does not capture Indigenous Elders' understanding of the human impact, climate change and cumulative effects on wildlife including caribou or other species at risk and the resulting impacts on Indigenous livelihoods. Denison's EIS states that existing disturbances in the area are from exploration activities with a general description of how disturbances from these activities will be managed. PAGC does not find sufficient evidence that the affected areas can be restored to their former state and will impact woodland caribou habitats. PAGC Elders prioritize the removal or reduction of human disturbances to the landscape for caribou recovery and wish to avoid projects which have a significant environmental impact. PAGC elders do not want to see any animals or plants disappear from the landscapes they use based on their traditional understanding of the relationship between humans and nature. This impacts the ability to practice treaty rights and entitlements to the lands which impact physical and mental health and mixed economy connected to hunting and gathering. PAGC urges Denison to understand and take an eco-cultural approach to preserve wildlife and landscape health when planning mining operations and decommissioning processes. This should include use of Indigenous Knowledge in delineating caribou habitats despite the data	Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. The potential effects of the Wheeler River Project on the aquatic and terrestrial environments have been comprehensively assessed in the EIS and related supporting documentation. The spatial scale is very small (resulting from ISR mining method) of 160 hectares. A conservative approach was taken in the assessment and the overall conclusion was made that there would be no significant adverse residual effects in consideration of proposed mitigations. The Wildlife LSA was designed to capture the majority of the Project effects. The LSA extends beyond Project Area of the site to include a reasonable estimation of where sensory disturbance from Project-related activities would extend and where effects on wildlife including caribou are most likely to occur. Section 9 describes how consideration of potential effects to wildlife and wildlife habitat are considered within the EIS. In regard to caribou, Denison has developed a Caribou Management Framework based on discussions between Denison and Saskatchewan Ministry of Environment. Denison utilized Indigenous Knowledge provided by Indigenous

			and woodland caribou traditional ecological knowledge available in the report published by Mamun and Brook (2017).	communities in the assessment and in the development of the Framework. Denison notes that the objective of Mamun and Brook (2017) was to support the provincial range planning process for conservation of woodland caribou. The range planning process for SK1 is currently underway. As needed, Denison's Framework will be updated to be consistent with the management goals defined by ENV for SK1. Additionally, as part of its boreal caribou management efforts, the province is working with industry to develop effective and practice approaches to mitigate potential effects of activities on woodland caribou through offsetting. Denison is committed to continue to work with the province to finalize the habitat offset requirement using the province's habitat offset calculator. Section 11 of the draft EIS provides the assessment of potential Project effects on Indigenous Land and Resource Use (Section 11.1) and Other Land and Resource Use (Section 11.2). The mitigation measures proposed in the aquatic and terrestrial assessments translated into undetectable changes in resource availability to existing and future users and rightsholders. The assessment does not take an eco-cultural approach but rather one focused on VCs, key indicators and associated measurable parameters, which are standard in impact assessment. Mitigation to eliminate, reduce, or control potential adverse effects of the Project on Indigenous Land and Resource Use would apply to any uses proximal to the Project. Given proven mitigation is to be applied to traffic disturbances, noise, air quality, and increased competition for resources, the effects are expected to be minimal. Denison's decommissioning commitment is to return the land back to the Province of Saskatchewan for unrestricted surface land use post-closure. The Project's Conceptual Decommissioning Plan (CDP) is included in the draft EIS. The details of decommissioning and restoration will be refined over time as the Project proceeds. A Preliminary Decommissioning Plan (PDP) will be developed by Denison to support licensing and permitting applications. Prior to executing decommissioning activities, Denison will prepare and submit a Detailed Decommissioning Plan (DDP) to regulators for their review and acceptance, which builds on the PDP.
566	PAGC (March 6, 2023)	Appendix 7-C 2.5.2.3 Statistical Measures of Calibration to Water Levels	Additional traffic and associated noise from the proposed project are a concern and PAGC requests that Denison puts a speed limit of about 70km/hour for trucks in the boreal forest where woodland caribou reside and are used by barren land caribou in winter.	The proposed operation is fly-in, so Project related traffic, and associated noise, to the area would only be related to deliveries of materials to and from the site. On-site staff will not have access to personal (or company) vehicles. The Project will not change public access to the area. The existing gate on Highway 914 near Cameco's Key Lake Operation will remain in place and no changes to the gate and the process for controlling access to Highway 914 north of the Key Lake Operation are proposed as part of the Wheeler River Project. Section 12.3.4.2.1 of the draft EIS describes change in traffic as a result of the Project, including truck average annual daily traffic and average annual daily traffic. Given proven mitigation, as described in Section 12.3.5, to be applied to traffic disturbances and associated noise the effects are expected to be minimal. Section 11.1.5 also describes the mitigation measures to reduce the impacts of traffic and noise, among others. For example, air transportation will be used to transport most workers between the Project site and designated pick-up and drop-off points in communities and noise generating equipment will be situated behind on-site obstructions. In regard to caribou, Denison has developed a Conceptual Caribou Mitigation Plan based on discussions between Denison and Saskatchewan Ministry of Environment. Denison recognizes the level of concern regarding Project related transportation it has received through engagement activities to date and will continue to solicit input on transportation concerns as the Project moves forward. As outlined in Denison's Indigenous Peoples Policy, Denison is committed to respecting Indigenous knowledge and values regarding environmental stewardship and Indigenous peoples' connection to the land, and to minimize potential effects where possible. As an example, Section 11.1.5.3 describes that Denison will require truck traffic to slow down to 40 km/hr for a minimum of 2.5 km o either side of the ERFN and KML (Pinehouse #9) cultural camps, which are understood to occur in September and October (but may be adjusted at the communities direction).

567	PAGC (March 6, 2023)	Appendix 7-C 2.6.3 Groundwater Flow Quantity	PAGC finds that science-based models used for EIA reports put Indigenous people at a disadvantage as Indigenous communities are not involved in the collection, analysis and interpretation of data for models. Indigenous culture does not make use of models, rather, they follow natural changes and patterns which sometimes are not reflected in scientific findings. Requesting feedback from Indigenous communities on a report full of models prepared without Indigenous involvement has limited value as PAGC members are not fully engaged throughout the process. This approach is somewhat disrespectful to Indigenous communities as they are not part of the development process and PAGC reserves the right to reject the EIA or EIS. PAGC requests a commitment from Denison to get Indigenous communities involved in each stage of the documentation and report preparation process.	Denison acknowledges that Indigenous ways of knowing are distinct from western science, and have included Indigenous knowledge shared by communities in the impact assessment process. For example, Section 10.1.2 describes that Indigenous Knowledge and Local Knowledge were used to inform assumptions used in the human health risk assessment which helped identify human health receptors (i.e., people) who consume traditional foods, specifically in terms of their locations, residency times, and components of the traditional foods diet. In this instance, Indigenous knowledge was used to complement western science. Denison remains committed to conducting meaningful engagement with Indigenous communities potentially affected by the Project and to understanding how the proposed development of the Project may affect the ability of Indigenous peoples to exercise collective Indigenous and Treaty Rights. Through the environmental assessment process ERFN and other Indigenous communities have opted to utilize third party supports to complement their review of the EIS. Third party reviews were supported by both agreements executed between Denison and Indigenous communities, along with participant funding offered by the CNSC. Section 4 of the EIS describes the engagement undertaken with Indigenous communities and organizations. Denison continues to work with its Indigenous Communities of Interest with reserves and residential communities most proximal to the Project, and an example of their continued involvement from the outset to end of a process includes the commitment to collaborating with English River First Nation and Kineepik Métis Local 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.
568	PAGC (March 6, 2023)	Appendix 7-C 2.7.1 Groundwater Demand	PAGC request additional details from Denison regarding plans to incorporate Indigenous partnership in the economic benefit of the mines, equity-based participation in the workforce and training opportunities for Indigenous personnel to operate in management roles. PACG suggest arranging long-term funding for youth education in science that would prepare them for careers in biology and environmental science, which is very uncommon among Indigenous communities. Increasing Indigenous representation in science and technology, and participation in development planning is therefore a valuable long-term goal.	As outlined in Denison's Indigenous Peoples Policy, Denison recognizes the critical necessity of advancing reconciliation with Indigenous peoples in Canada and the important role of Canadian business in the reconciliation process. Denison is committed to providing Indigenous people and businesses with sustainable economic opportunities and benefits and sharing the economic benefits of Denison's business activities. Denison's Indigenous Peoples Policy sets out priority for Indigenous employment and procurement (among other items). With respect to employment, as noted in the Economics section of the EIS, Residents of Saskatchewan's North (i.e., those resident in the northern administration district of Saskatchewan) are prioritized for employment as an expected condition of the Surface Lease Agreement, similarly for goods and services to service the Project. With respect to procurement, Denison has established an internal procurement policy approach. The approach requires that Denison consider businesses within the local study area first and the Northern Administrative District second, prior to looking elsewhere (southern Saskatchewan and/or outside of Saskatchewan) throughout all phases of the Project. 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. This may include initiatives associated with youth education in science if that is the interest and priority of the communities. Training could also 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.

Attachment: IR-10

Number	IR-10
Dept.	ECCC
Project effects link	Fish and fish habitat
Reference to EIS, appendices, or supporting documentation	Section 2.2.1.4.2.3, Tertiary Containment of Mining Solution - Freeze Wall
Context and Rationale	**Context:** The Proponent stated that as a tertiary means of containment for the mining area, the uranium deposit is proposed to be surrounded by a freeze wall that extends from the surface to the basement rock, isolating the mining area from regional groundwater. Current plans are for the freeze wall 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 (Figure 2.2-6). As explained in Section 2.2.1.4.2.2, mining solution will be injected into the ore zone under pressure and will likely react, not just with the uranium in the ore zone, but also the binding or cementing material in the sandstone. This means that some portion of the sandstone above the uranium layer and perhaps some portions of the freeze wall will dissolve, thereby creating more void than just the thickness of the uranium layer or horizon. The void may affect the integrity of the freeze wall as containment. **Rationale:** It is not clear how the Proponent will monitor the freeze wall to verify whether portions of the freeze wall are being dissolved in the mining process and how it plans to verify the integrity of the freeze wall as a containment for the mining solution. In addition, if the dissolution reaction of the uranium ore is exothermic, then the heat generated may also affect the integrity of the freeze wall.
Information Requirement	1. Explain how the integrity of the freeze wall will be maintained as a means of containment that prevents migration of the mining solution out of the ore zone into the receiving environment. 2. Demonstrate that the mining solution injected under pressure will not compromise the integrity of the freeze wall as a containment.

	3. Demonstrate how both exothermic and chemical reactions of the mining solution used to dissolve the uranium ore will not compromise the integrity of the freeze wall as a containment. Technical Discussion Required: Yes. ECCC would like to better understand the chemical constituents that compose the mining solution and the chemical reactions that it will cause

Response:

The general theme of the comments and questions stated above seem to be related to:

- verification of the freeze wall extents;
- response of the freeze wall to potential chemical interaction with the lixiviant;
- response of the freeze wall to induced hydraulic or lithostatic stress; and
- response of the freeze wall to potential exothermic processes related to ISR.

The alignment of the freeze wall is located 25 m offset from the lateral extent of the recoverable ore and the freeze wall will grow in thickness both towards the ore and away from the ore. The freeze wall will solidify all liquid porewater and develop into a contiguous impermeable barrier many metres thick. Ground temperature monitoring will be installed on both the ore and non-ore sides of the freeze wall to confirm the thickness of frozen ground and to validate thermal finite element models of the entire area. Thermal models can very accurately represent real conditions because ground thermal properties used in the analyses only vary by a factor of two to four across all ground types, unlike hydraulic or strength properties, which can vary by many orders of magnitude across relatively short distances.

The figures below are an example of field data validating modelled predictions for a shaft freeze wall at depth.

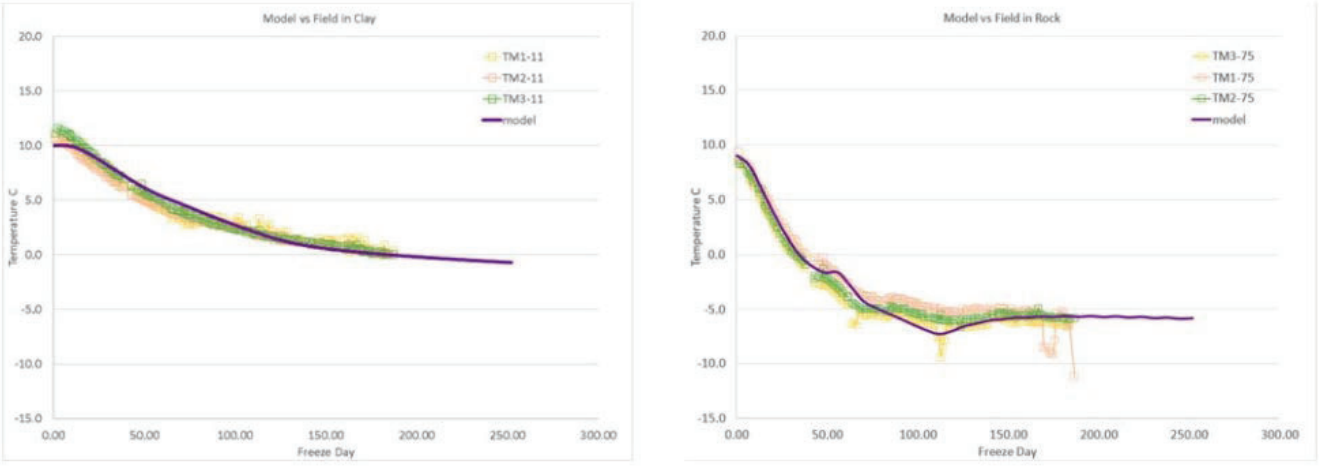

Figure 1: Illustration of a calibrated FEM model for freezing in clay (left) and rock (right). Temperatures were measured offset from the freeze wall pipe locations and compared with model predictions at the same location.

The injection and recovery wells will be set up such that they are within the confines of the ore itself and migration of fluids towards the freeze wall and through non ore ground between the ore and freeze wall should be minimized because hydraulic gradients will induce preferential flow to recovery wells and away from the freeze wall. Having said that, if significant excursion of lixiviant were to occur and it were to contact the freeze wall, it is not expected to chemically dissolve the in situ ice. The freezing point depression of the lixiviant proposed for this project was determined to be -1°C and, as such, it would freeze off and become immobile before significant volume could negatively impact the freeze wall. If the lixiviant were to dissolve some of the host soil / rock binding material at the freeze wall surface, it would occupy the resulting void space, but then freeze off, which would halt further migration within the freeze wall.

Freeze walls, when fully developed, are capable of withstanding significant external pressures because the ice in the pore voids greatly improves the bulk strength of the soil. For example, in the province of Saskatchewan, ground freezing is used to support the sinking of deep potash mine shafts, which must penetrate through the Mannville formation at a depth between 400 and 500 m below surface. The Mannville formation is often described as saturated, unconsolidated beach sand and it would not support shaft excavation in a thawed state. Freezing is used to create a structural and impermeable wall up to 5 m thick, which can resist a stress gradient driven by full hydrostatic and/or lithostatic pressures on the outside of the wall, and an open to atmosphere excavation within the shaft. This loading condition is much more extreme than any condition the freeze walls at the Phoenix deposit will experience because the interior side of the freeze wall where active ISR mining is occurring is not open to atmosphere and is fluid filled in the same way that the regional groundwater system is on the exterior side of the freeze wall, creating a balanced pressure system, where loading is equal on both the interior and exterior sides.. While freeze walls are very strong when fully developed, they are also plastic in nature. This means that they can slowly deform without failing in response to localized ground deformations. As the freeze wall deforms towards a lower stress zone, it maintains its thickness and integrity. While the above example referred to potash shafts, other examples can be drawn from the experience at the McArthur River or Cigar Lake uranium mines. At McArthur River, open stopes are generated directly adjacent to a freeze wall that is a nominal 4 m thick. At Cigar Lake, open mine cavities 10 m high and several metres in diameter commonly exist within the frozen ground. Neither site has had a breach of the freeze wall during mining activity. Given that the freeze wall at Denison will be much thicker than at McArthur River and that it will be located up to 25 m from the ore zone, it is not anticipated that it will be exposed to a stress environment that will put it at risk.

The leaching process has the potential to be exothermic and generate heat, which may flow toward the freeze wall. In this instance, there is low sulphur content in the ore zone and the exothermic reaction will be minimal. Despite this, all thermal modelling in support of the freeze design assumed that the freeze wall had to develop and be sustained in the presence of an ore zone that generated a nominal amount of heat—sufficient enough to sustain a minimum temperature of 10°C even though it would naturally tend to cool below this in response to the freeze system. It is understood that the lixiviant may be heated as part of the pre-injection process, so some accounting for heat in the ore zone was included in the analysis to date. Should the lixiviant generate more exothermic reaction than predicted, there is a very low risk of it degrading the freeze wall in any significant amount. Referring back to the potash mine shaft freezing illustration, it is not uncommon for in shaft excavation activity and concrete work to

generate temperatures between 30 and 60°C that act on a freeze wall only 5 m thick and only a few metres away from the exposed shaft wall. In this extreme case, the freeze wall is more than capable or removing the generated heat. The physics of heat flow are such that heat generated by the ISR process would be free to flow towards the freeze wall; however, most of it would flow to the coldest location (e.g., the actual freeze pipes at the mid-point of the wall thickness) before it is manifested as an observable significant rise in ground temperature. Even if the heat were to warm the ore side of the freeze wall, it would not impact the non-ore side of the wall (which is where half of the total wall thickness presides). This heat may penetrate to the center of the wall but if the refrigeration plant is operating, that heat can not then flow "up gradient" on the non-ore side of the wall and thaw that side.

The concentration of the lixiviant (max ~8% sulfuric acid conc.) has a freezing point of ~-4°C. The lixiviant itself will not react chemically with the freeze wall, other than having a slightly different freezing point than formation water. The main reaction expected is dissolution of uraninite with the combination of sulfuric acid, hydrogen peroxide, and ferric iron. This reaction is exothermic, but there are several natural mitigating factors of the wellfield that aid in minimizing heat transport to the freeze wall:

- The wellfield will have flexibility in terms of reagent concentrations being added. With the bulk of the uranium being contained within a higher-grade core (interior to the deposit), the exterior of the deposit will see either lower injection/recovery flows or lower concentrations of lixiviant to be efficient with reagent consumption. Whether the concentration or flow is reduced, this limits the reaction rate and therefore total heat generation at the extremities of the deposit.
- There is no refortification of reagents underground compared to typical uranium tank leaching. This prevents additional heat generation from dilution of sulfuric acid or hydrogen peroxide.
- The heat capacity of lixiviant/UBS should be higher than the ore in the deposit, which means the UBS solution will carry the majority of the heat to surface rather than keeping the heat of reaction at depth.
- In the event the freeze wall thickness monitoring network detected an actionable thinning to the freeze wall, the concentration of lixiviant could be decreased which would reduce the heat generated per m3 of lixiviant and re-establish the desired freeze wall thickness.

To summarize the risk of the degradation of the freeze wall due to exothermic reaction, it is almost impossible—with the freeze plant operating—to practically add sufficient sustained heat to thaw the proposed freeze wall to the point hydraulic containment is compromised. Sufficient operational controls will be in place to verify the freeze plant is operating, to measure the temperature in the ore zone, and to measure the temperature on adjacent sides of the freeze wall so that early detection of any upset conditions can be identified and addressed. Options for addressing issues are to lower the temperature of the freeze system to draw more heat out, to increase the freeze coolant flow rates in freeze wells nearer to active ISR cells, or to adaptively manage the lixiviant injection and recovery rates in cells located nearer the freeze wall.

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To: Ya'Thi Néné Lands and Resource Office

From: Denison Mines Corp.

Date: November 22, 2023

Re: Wheeler River Project Environmental Impact Statement - Denison's Response to Woodland Caribou Habitat Comments

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Attachments

Attachment A: Ya'Thi Néné Lands and Resource Office Comments Related to Woodland Caribou Habitat

Attachment B: Pilot Program: Linear Feature Mitigation Interim Report – Status Update and Preliminary Results

Attachment C: Conceptual Caribou Mitigation Plan

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1 Summary of Ya'Thi Néné Lands and Resource Office (YNLR) Comments

Denison Mines Corp. (Denison) received consolidated comments from Indigenous Nations and Communities and the public on the draft Wheeler River Project (the Project) Environmental Impact Statement (EIS) from the Canadian Nuclear Safety Commission on June 27, 2023. These comments are at: [available on the federal impact assessment registry (https://iaac-aeic.gc.ca/050/documents/p80178/152187E.pdf)](https://iaac-aeic.gc.ca/050/documents/p80178/152187E.pdf) .

This technical memorandum (memo) is provided to supplement Denison's responses to YNLR's comments that can be found in the comment / disposition table. The memo addresses a number of comments that pertained to a similar theme – that is, woodland caribou habitat and questions regarding how the Project could add to the existing disturbances on the landscape, primary mineral exploration cutlines. Specifically, this memo considers YNLR comments numbers 53 to 68 and provides a more coherent, inclusive, and integrated response to facilitate review.

2 Existing Anthropogenic Disturbance: Considerations in the Terrestrial Environment Component of the Environmental Impact Assessment

2.1 Baseline Characterization

A two-step procedure was used to develop baseline mapping for the Local Study Area (LSA) and Regional Study Area (RSA) that including delineation of anthropogenic disturbance. First, the Environment and Climate Change Canada (ECCC) national level anthropogenic mapping was downloaded and clipped to the study area boundaries (ECCC 2015). Second, to improve the resolution and ensure appropriate characterization of disturbance, all visually discernible anthropogenic features in the area were digitized at a scale 1:5,000. To support this process and enhance the final product, a combination of 2018 project specific ortho-photography, Landsat Imagery (2018) and Map Info Microsoft Bing Imagery (2018) were used to visually identify/confirm anthropogenic features. Industrial clearings (polygons) were hand drawn based on the imagery. All linear features were digitized as lines and buffered to create polygons as per the widths detailed below:

- Cutline: 1.75 m
- Right-of-way (ROW): 2.5 m
- Trail: 4 m
- Rough Road: 5.5 m
- Road: 10 m
- Transmission ROW: 40 m
- McArthur-Key Haul Road/Highway 914: 40-60 m

The baseline efforts to characterize and map anthropogenic disturbance in the LSA and RSA were used to develop the ecosite mapping that was used in Section 9 of the EIS to support assessment of potential Project related effects on relevant Valued Components and Key

Indicators. Considering this approach, existing geophysical cutlines are included in baseline studies and results from baseline field surveys reflect wildlife species use of the area under existing conditions.

2.2 Exploration Activities

As noted in the YNLR review comment mineral exploration activities occur in the Athabasca Basin. Denison believes it is useful herein to clarify mineral exploration terminology within the context of its understanding of such activities in the region (in which it engages) and terminology used by YNLR.

For clarification seismic lines and cut lines are two very different items in terms of scale. A seismic survey is a geophysical survey type that is not typically used in the Athabasca Basin as part of exploration activities as it has had limited positive results. When used, it requires the development of relatively large and wide lines (~5 m; seismic lines) to accommodate the movement of seismic equipment that is mounted on a half-ton sized equipment. In Denison's experience, seismic survey applications are generally restricted to projects in an advanced state of development, as they are expensive to complete and do not provide good value at the early stage of the exploration cycle. In contrast, cut lines, which are generally no more than a 1 m wide, are the preferred methods to orientate a ground survey once airborne surveys have identified an area of exploration interest. These cut lines do not remove the roots of the trees and leave slash (tree branches, woody debris) behind to promote new vegetation growth. Cut lines can facilitate geophysical surveys such as magnetics, electromagnetic, gravity, and resistivity. More recently, technologies such as drones have been adapted to accommodate detailed magnetic and electromagnetic surveys which can be flown close to the ground surface without the need of cut lines. Other surveys such as resistivity still require a level of precision that rely on the use of cut lines to accommodate crews and equipment.

In order to conduct mineral exploration activities on Crown land within Saskatchewan, surface disturbance permits are required from the Ministry of Environment before any work can be started. The Mineral Exploration Guidelines for Saskatchewan provides information to assist in the planning, initiation, and completion of a mineral exploration program in a fashion that will help minimize environmental impacts and meet relevant legislative requirements. The Mineral Exploration Guidelines include a variety of best management practices including those related to access and forest clearing/harvesting operations.

For context and to relate this information back to Section 2.1 Baseline Characterization, the majority of the straight linear features digitized in the LSA and RSA as part of the baseline anthropogenic mapping were cutlines. These lines were buffered by 1.75 m to create polygons.

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2.3 Appendix 9-B

Appendix 9-B of the draft EIS presents the baseline inventory for wildlife and vegetation which was completed by Omnia Biological Services (Omnia) from 2016 to 2019. The baseline report is meant to summarize the findings from targeted studies and field surveys. The objectives of the terrestrial baseline surveys were to:

- Characterize the existing terrestrial environment in the Project Area,
- Inform pre-feasibility engineering design work,
- Inform environmental effects and technical assessments,
- Establish a framework to facilitate future environmental effects monitoring, and
- Support the development of project specific mitigation strategies .

Accordingly, **the baseline report was not intended to provide an assessment of Project effects**. It is recognized that Appendix 9-B, Section 2.3 Linear Feature Natural Regeneration Assessment, is not aligned with the overall objectives of the baseline report and moreover, is not meant to be read in conjunction with, or contribute to, the effects assessment presented in the EIS.

In addition, there are incorrect statements contained in Appendix 9-B, Section 2.3 Linear Feature Natural Regeneration Assessment, which are a result of incorrect interpretation of methodological approach to consider caribou habitat disturbance. These statements were effectively outside the scope of the baseline scope and report objectives and in retrospect should not have been reported.

Here is one of the statements in Appendix 9-B, Section 2.3 Linear Feature Natural Regeneration Assessment which has caused confusion around existing disturbance on the landscape:

> *For SK1, in 2018, ECCC indicated that to ensure sustainable caribou populations total buffered anthropogenic disturbance should not exceed five percent and that total disturbance (natural + buffered anthropogenic) should not exceed 40 percent. Currently, under this scheme, the Denison project area is considered to be completely disturbed when taking into account buffered anthropogenic disturbance in the LSA and is 82% disturbed in the RSA. Linear disturbances, in the form of exploration lines, temporary exploration trails and all season and seasonal roads were most common.*

Denison provides the following clarifications and corrections:

- The baseline information used an outdated recovery strategy. The Omnia baseline report was finalized in 2019 and the most recent recovery strategy available at that time and referenced in the report was from 2012 (EC 2012). The 2020 amended recovery strategy (ECCC 2020) replaces the 2012 Recovery Strategy (ECCC 2012).
- The anthropogenic mapping completed to support the draft EIS was done at a higher resolution/scale compared to ECCC's approach in the amended recovery strategy (ECCC 2020).

- As noted above, **anthropogenic mapping was done using digitization at the 1:5,000 scale** to support the EIS.
- ECCC (2020) mapped total disturbance levels on boreal caribou ranges across their distribution in Canada as a predictor of self-sustainability for boreal caribou local populations. The total disturbance footprint was measured as the combined effects of fire that has occurred in the past 40 years and **buffered (500 m) anthropogenic disturbance defined as any human-caused disturbance to the landscape that could be visually identified from Landsat imagery at a scale of 1:50,000**.
- Contrary to what was shown Section 2.3 of Appendix 9-B, applying a 500 m buffer to geophysical cut lines digitized at 1:5,000 scale is not consistent with the amended recovery strategy (ECCC 2020). **At the 1:50,000 using Landsat imagery, geophysical cutlines would not be visible**.

- Given the above, the information presented in the Omnia baseline report (Appendix 9-B, Section 2.3 Linear Feature Natural Regeneration Assessment) was erroneous in that it was beyond the scope and objective of the baseline program. In fact, this section of the baseline report reflects and is related to Denison's initiation of a proactive, multi-year research program to better understand how wildlife use linear features. We have attached an interim report from Omnia for YNLR's reference. Among other things the report includes information on wildlife landscape use and movement from trail camera data that indicates considerable use of and movement along linear features. This interim report and the linear feature deactivation work is also discussed in the conceptual woodland caribou mitigation plan. The baseline report should have focused on the results of surveys and existing information that describe the existing conditions in the project areas and should not have extended beyond this scope. The assessment of potential Project effects on the various terrestrial Valued Components (VCs) is included in the main part of Section 9 and as indicated Appendix 9-B, Section 2.3 Linear Feature Natural Regeneration Assessment, was not meant to be read in conjunction with, or contribute to, the effects assessment presented in the EIS.

Denison recognizes that a number of YNLR's comments reference Appendix 9-B and regrets the confusion it has caused during YNLR's review of the draft EIS. Denison will revise Appendix 9-B to remove the discussion on cumulative effects and buffered anthropogenic disturbances. We refer YNLR to the analysis and assessment completed by the environmental assessment (EA) technical leads and biologists at EDI Environmental Dynamics Inc., as presented in Section 9 of the draft EIS.

2.4 Assessment of Potential Effects on Woodland Caribou and their Habitat

All past anthropogenic disturbances (which includes cutlines to support mineral exploration) were considered in the various terrestrial environment assessment components. These human

disturbances were mapped and considered/addressed appropriately in Section 9 including the Existing Environment, Residual Effects Characterization, and Cumulative Effects Assessment sections, as they relate to Terrain, Soil and Organic Matter/Peat (Section 9.1); Vegetation and Ecosystems, Listed Plant Species and Wetlands (Section 9.2); Ungulates, Furbearers and Woodland Caribou (Section 9.3); Raptors, Migratory Breeding Birds, and Bird Species at Risk (Section 9.4). **The cutlines were classified as previously disturbed areas and considered as low-quality habitat or no habitat, depending on the species being assessed and their habitat requirements.**

An anthropogenic disturbance layer is included on draft EIS, Figure 9.2-6, which includes geophysical cutlines. Please note that anthropogenic disturbance features were mapped at IKONOS 1:5,000. This anthropogenic disturbance layer is not listed under available habitat types for any of the wildlife or avian VCs in subsequent assessments (e.g., Figures 9.3-9 to 9.3-14, Figures 9.4-8 to 9.4-11, Figures 9.4-13 to 9.4-15), except for Common Nighthawk (Figure 9.4-12) that is a species known to use anthropogenic features.

In terms of the woodland caribou population in SK1, the likelihood of self-sustainability for the Boreal Shield range (SK1) has been updated from “unknown” (EC 2012) to “likely” in the amended recovery strategy (ECCC 2020). The SK1 range comprises more than 18,000,000 ha and is characterized by high fire disturbance and low anthropogenic disturbance (ECCC 2020). For SK1, the amended recovery strategy (ECCC 2020) identifies 40% undisturbed habitat in the range as the disturbance management threshold, which provides a measurable probability (71%) for the local population to be self-sustaining. This threshold is considered a minimum threshold because at 40% undisturbed habitat there remains a risk (29%) that the SK1 local population cannot be self-sustaining. According to ECCC (2020) disturbed habitat is habitat showing: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). In contrast, according to ECCC (2020) undisturbed habitat is habitat not showing any: i) anthropogenic disturbance visible on Landsat at a scale of 1:50,000, including habitat within a 500 m buffer of the anthropogenic disturbance; and/or ii) fire disturbance in the last 40 years, as identified in data from each provincial and territorial jurisdiction (without buffer). The cumulative effects assessment in the draft EIS showed that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS).

Specific to woodland caribou, the draft EIS evaluated and assessed potential Project-related effects on the boreal population of woodland caribou following standard environmental assessment (EA) methodology. The assessment of potential effects considered both direct (i.e., habitat loss) and indirect effects (i.e., habitat alteration) on caribou and their habitat, while assuming that caribou were present year-round and during all of their life stages (i.e., calving, rearing, mating, over wintering). In this way, the EIS took a precautionary or conservative approach to understanding/addressing the likely residual effects (i.e., effects remaining after mitigation measures were considered) of the Project on caribou and their habitat. This approach provides is appropriate as a planning tool to inform/support future Project-related

regulatory approvals processes and to guide the scope and nature of follow-up monitoring. After consideration of measures to avoid and mitigate the potential for effects on caribou and their habitat it was concluded that the likely residual effects of the Project on caribou and their habitat were **not significant**. While the EIS did not consider specific additional opportunities to offset the non-significant effects, Denison has been working to develop a Conceptual Caribou Mitigation Plan (see Section 5 below). The plan was submitted to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan and Denison has been in close contact with the Saskatchewan Ministry of Environment (SK ENV), as stewards of woodland caribou from a regulatory perspective.

3 Spatial Scale for the Caribou Assessment

Several of YNLR comments were related to the spatial scale of the caribou assessment. This section presents an overview of the approach taken in the terrestrial assessment and specifically where the SK1 range was considered in the caribou assessment.

The rationale for the definition of study areas for the purpose of the assessment of the Terrestrial Environment valued components (VCs) is described in Section 9.1.1 of the draft EIS. The Project Area (169 ha or 1.69 km^2) and LSA were delineated based on the expected extent of potential direct (footprint) and indirect (sensory disturbance) Project effects; whereas, the RSA considered an 8 km buffer around the Project Area to provide an appropriate spatial scale upon which potential Project effects could be evaluated at the landscape scale where key Terrestrial Environment VCs reside and move within and upon which cumulative effects could be assessed.

Boreal caribou occur as one continuous population across the SK1 range (18,034,870 ha), including within the Terrestrial RSA. After consideration, it was decided by Denison and its Subject Matter Experts at EDI Environmental Dynamics Inc. to use the Terrestrial RSA for the cumulative effects assessment for caribou rather than the entire SK1 range. This decision was made largely on the basis that it would not be feasible / appropriate to use a such large area like the SK1 range to assess cumulative effects since consideration of such a large spatial extent would likely "dilute" the contribution of the Project to potential effects at that scale. In support of this decision, comparison of the Project-specific habitat effects (i.e., the Project Area plus a 500 m buffer to account for sensory disturbance) relative to the scale of the SK1 range (as the applicable management unit for portion of the woodland caribou population that uses the Terrestrial RSA) was made. The comparison indicated that the Project is expected to add 0.001% of anthropogenic disturbance at the scale of the SK1 Boreal Shield Woodland Caribou Management Unit (Section 9.3.7.3.3 of the EIS). As can be seen, the default conclusion at the range scale could only be that the Project does not contribute to cumulative effects at a practical measurable level.

In addition, it is appropriate to also consider the assessment of terrestrial environment from the perspective of Land and Resource Use per Section 11 of the draft EIS, since the two (Terrestrial Environment and Land Are Resource Use) are so intimately related. For context the Terrestrial Environment RSA, fits within the Indigenous Land and Resource Use RSA. Section 11 of the

EIS is focused on Land and Resource Use and includes consideration for various terrestrial VCs and key indicators (KIs) as resources. With respect to Indigenous Land and Resource Use, the definition of spatial boundaries is offered in Table 11.2-2, which notes that the LSA is inclusive of the area in which direct and indirect effects to relevant VCs could likely occur, and includes the maximum combined extent of supporting VCs associated with the aquatic, terrestrial, noise, and health LSAs. Additionally, it is inclusive of trapping, fishing, and travel through and adjacent to the Project Area. The RSA is inclusive of trapping block N-18, which represent a familiar reference for local Indigenous communities and capture the broad land usage patterns of local communities.

4 Cumulative Effects Assessment under the Canadian Environmental Assessment Act, 2012

The Wheeler River Project EIS is subject the *Canadian Environmental Assessment Act, 2012*. In this assessment framework, the Project-specific cumulative effects assessment (CEA) considers whether residual adverse effects of the Project on a given VC will overlap spatially and/or temporally with residual adverse effects on the VC resulting from other past, present, and reasonably foreseeable projects or activities. The CEA follows standard methodology as per provincial (e.g., Guidelines for an Environmental Assessment [Government of Saskatchewan 2022]) and federal guidance (e.g., Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012 [Government of Canada 2019]).

For residual effects to be considered in the CEA for the Project, the following criteria had to be met:

- potential exists for a residual adverse effect of the Project on a VC;
- the residual adverse effect can be demonstrated to act cumulatively with the residual adverse effects from other projects or activities on the same VC;
- other projects or activities must have been, or are expected to be, carried out in the reasonably foreseeable future; and,
- the cumulative effect is likely to occur.

The approach for assessing cumulative effects considers both the current conditions (which include changes caused by past development, projects, and activities, and are, therefore, considered in the baseline condition of the VC) and the identified reasonably foreseeable future projects and/or activities.

The steps of the CEA for each VC are:

1. Determine the spatial boundaries for the CEA, which is VC specific, and typically the RSA for the VC.
2. Determine the project inclusion list of all other past, present, and reasonably foreseeable projects and/or activities that are expected to have adverse residual effects that extend into the VC RSA.

3. Consider all Project-related residual effects that were identified during the effects assessment for each VC, regardless of significance.
4. Identify the potential for interaction (i.e., must overlap spatially and temporally) of the Project-related residual effects with those of other projects and activities identified in Step 2 above.
5. Identify and describe the cumulative effects, and if practical, identify technically and economically feasible mitigation measures (i.e., in addition to those already identified to mitigate potential Project effects) to avoid, reduce, or otherwise mitigate the predicted cumulative effects.
6. Qualitatively assess and evaluate (i.e., characterize) the cumulative effects with respect to the likely nature and degree of change from the existing (baseline) environment as a result of the Project's residual effects in combination with the residual effects of other relevant future projects and activities.
7. Determine the significance of the cumulative effect using characterization criteria as defined for the residual effects evaluation.

In the draft EIS, Denison included a number of project activities as existing/present and reasonably foreseeable. This includes historic anthropogenic disturbance associated with exploration activity, drilling, and access creation in support of past exploration and mining activities have occurred within the Athabasca Basin since the 1940s when uranium was first discovered in the region.

4.1 Woodland Caribou CEA

The CEA framework described above provides the framework upon which the CEA for woodland caribou was conducted. Residual effects resulting from the Project in combination with those from ongoing and reasonably foreseeable projects and activities that were identified (see draft EIS, Section 9.3.7.2) may act cumulatively to potentially affect woodland caribou in the Terrestrial RSA. They key endpoints through which the CEA was considered included the alteration and/or loss of habitat and change in mortality. For reference, for alteration and/or loss of habitat the draft EIS considers existing habitat disturbances due to past and ongoing anthropogenic development, which includes old exploration trails and disturbances associated with line cutting, drilling, and access development.

The woodland caribou population in the region is reported to be stable and their anthropogenic habitat disturbance is currently estimated at 1.5% in the Terrestrial RSA, which is below the 5% threshold of anthropogenic disturbance recommended as a requirement to sustain viable populations (ECCC 2019). The Project will add another 0.4% of anthropogenic disturbance (considering the Project Area of 169.6 ha) adding up to 1.9% of anthropogenic disturbance in the Terrestrial RSA. It is not expected that the cumulative effect of alteration and/or loss of habitat will alter the integrity of woodland caribou habitat within the Terrestrial RSA to the point where it is not sustainable or available to contribute to ecological functions. Therefore, the cumulative effect resulting from the Project's residual effect interacting with residual effects from other projects and activities is predicted to be **not significant**.

4.2 How Indigenous Perspectives Influenced the Cumulative Effects Assessment

Cumulative effects assessment is important to Indigenous communities in general because incremental changes to the environment can weaken resource economies, affect important resources such as plants, fish, and wildlife, affect rights-based and cultural activities, and affect both the health of wildlife and humans (Indigenous Centre for Cumulative Effects 2021). Indigenous perspectives can be complementary to the CEA for the Project, and Denison acknowledges the important relationship of the Indigenous Communities of Interest to the lands and waters. The Indigenous Communities of Interest of English River First Nation (ERFN) and the Kineepik Métis Local #9 at Pinehouse (KML) have shared their Indigenous Knowledge on past, present, and predicted cumulative effects through the following sources:

- Wheeler River Project – Summary of Health and Socio-Economic Study Results (ERFN and SVS 2022a);
- Wheeler River Project - Summary of Traditional Knowledge Study Results (ERFN and SVS 2022b);
- Kineepik Valued Ecosystem Components – KML Pre-statement for Denison EIS (KML and NVP 2022); and
- Response to the Environment Impact Assessment For the proposed Ministry of Highways 914 Extension Project (KML and Limnos Environmental 2022).

These perspectives on cumulative effects have been summarized in Section 3.4.8 of draft EIS. Denison and the Communities of Interest agreed on the high value of this contribution being part of the EIS.

Denison recognizes that Indigenous Knowledge systems offer an alternative source of knowledge, often complementary to western science (Eckert et al. 2020). The CEA for the Project followed standard methodology as per provincial (Government of Saskatchewan 2022) and federal guidance (Government of Canada 2019). Among the sources of information to consider, the federal guidance notes the importance of “Aboriginal traditional knowledge, community knowledge and scientific knowledge, or simply an expression of concern regarding potential cumulative effects to a particular VC” (Government of Canada 2019). All sources of information were considered by discipline leads as described in the respective draft EIS sections and in Section 4, Engagement. The CEA for all VCs completed for the Project incorporated, as appropriate, the characterization of activities/events that have shaped the existing environment and continue to influence the VCs used for the EIS.

5 Conceptual Caribou Mitigation Plan

Following submission of the draft EIS in October 2022, Denison has met with Saskatchewan Ministry of Environment (SK ENV) staff to develop a framework for future woodland caribou offset. This information has been presented to the provincial and federal review teams as part of the response to federal information requirements in August 2023 as the Conceptual Caribou Mitigation Plan (**Error! Reference source not found.**).

The Conceptual Caribou Mitigation Plan (the Plan), developed proactively by Denison, has a different objective than the draft EIS. The Plan builds on the assessment of potential Project effects and commitments to consider additional mitigation (offset) to account for non-significant residual effects highlighted in the draft EIS. The Plan is expected to be advanced with ongoing consultation with the SK ENV, as SK ENV finalize the caribou range plan for SK1. The EIS is a conservative planning tool, whereas the Plan is a practical, living document designed to define management works associated with caribou. The Plan is not a requirement for EA determination *per se*, but is provided as a guidance document to help Denison proactively describe and inform the development and implementation of appropriate mitigation measures related to caribou and their habitat.

The Plan is an evergreen document. It will be consistent with the management goals of SK ENV for the SK-1 caribou conservation unit and will be developed/refined in consultation with local communities including English River First Nation and Kineepik Métis Local in Pinehouse and regulators. As noted above, the boreal caribou range plan for SK-1 is under development and it is understood that this Plan will be updated as more information becomes available. The conceptual nature of the Plan is in part due to the absence of range plan priorities and reflects Denison's commitment to continue to work with the province to meet the management objectives and management strategies for the SK1 range.

Denison is continuing to work with SK ENV to estimate habitat offset scenarios based on the current Project design which will be refined as the Project advances. A boreal caribou habitat offset calculator is under development by SK ENV and Denison is collaborating with SK ENV to define key scenario attributes. SK ENV will engage with Indigenous communities and nations as the province develops and refines the range management plan for SK1.

6 Closing

Denison is confident in the methodology used in the terrestrial assessments and the assumptions used to conduct the woodland caribou assessment were conservative and the assessment followed a precautionary approach. The CEA was conducted in a manner consistent with the requirements of CEAA 2012 and related guidance documents for a Project-specific CEA and appropriately assessed potential cumulative effects for woodland caribou at the RSA and range (SK1) scales. The EIS concluded that the Project could be implemented in consideration of proposed mitigations whereby **both Project-related and cumulative residual effects would be not significant**.

7 References

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