

VIA MAIL & E-MAIL
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July 18, 2008

Canadian Nuclear Safety Commission
Environmental Assessment Division
280 Slater Street
P.O. Box 1046 Station B
Ottawa ON K1P 5S9

Dear Sirs:

Re: Comments on the "Process Improvement Initiatives for Screening Environmental Assessments at the CNSC"

The purpose of this letter is to declare the support of the Saskatchewan Mining Association for the proposed improvements to the process by which the Canadian Nuclear Safety Commission (CNSC) carries out environmental screenings required by the Canadian Environmental Assessment Act (CEAA).

The need for improved effectiveness and efficiency in the environmental assessment (EA) process has been a long standing priority of the mining industry in Canada, including the SMA. We are encouraged by recent initiatives. These include:

- An initiative from the August 2006 Mines Ministers Conference. This resulted in a workshop involving federal, provincial and territorial representatives from the Mineral Industry Intergovernmental Working Group together with industry associations' representatives including SMA. The workshop (Regulatory Efficiency Workshop, Intergovernmental Working Group, Ottawa, March 8/9, 2007) resulted in a report to the Mines Ministers with a number of recommendations to enhance regulatory efficiencies and effectiveness.
- The Federal Cabinet Directive on Streamlining Regulation issued April 1, 2007.
- The formation of the Major Projects Management Office within Natural Resources Canada to improve the federal regulatory process for major natural resource projects (south of 60° latitude).
- The Northern Regulatory Improvement Initiative (NRII), developed by Indian and Northern Affairs Canada (INAC), which focuses on both operational level improvements to areas of federal responsibility and developing longer term improvements. In response to both the Cabinet Directive and the NRII, the Minister of INAC appointed a Special Representative in

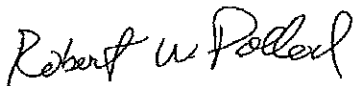
November, 2007 to review regulatory systems across the North. The resulting report "Road to Improvement" has been recently submitted to the Minister of INAC.

Given this broad recognition of the need for improvements to federal regulatory processes, and the growing importance of the nuclear industry, including uranium mining and milling, to Canada, the SMA believes it is both appropriate and timely for the CNSC to review its implementation of CEAA screening requirements, and to search for and implement improvements. The SMA supports both the initiative and the recommendations to the Commission.

We believe that a change which aligns the screening process with the scope and complexity of the project is fundamentally sound. We support both of the recommended major changes to the EA process, namely the streamlined approach for small screenings and the integrated approach for complex screenings; and the recommendations related to improvements to process prerequisites. Both of the SMA member companies which operate CNSC licensed facilities, Cameco Corporation and AREVA Resources Canada Inc., are submitting more extensive comments. We urge CNSC to carefully consider their comments. We wish to make only one further comment, related to the process for projects where EA requirements arise from both CEAA and The Environmental Assessment Act of the Province of Saskatchewan. We note that a multi-jurisdictional EA is proposed to automatically trigger a complex screening. It is not clear why this should be the case, given the federal/provincial harmonization accord, and substantial experience by CNSC and the Saskatchewan Ministry of Environment in its implementation. Regardless of process, it is important that both parties continue to strive for efficiency and effectiveness when there are overlapping EA requirements.

In closing, we wish to reiterate our support for the proposed process improvements for screenings carried out by CNSC. In developing and considering these improvements, it is important that the process be open and transparent. We believe that the CNSC process meets this requirement, and appreciate the opportunity to contribute.

Yours truly,



Robert Pollock
Chairman Uranium Section
Saskatchewan Mining Association