

Richard B. Salter

June 27, 2014

Jean Teillet, IPC

Patsy Thompson
Director General

Colin Jesse Salter

Directorate of Environmental and Radiation Protection and Assessment
Canadian Nuclear Safety Commission

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Nuri Frame

BY EMAIL

Paul Bachand

Dear Dr. Thompson,

Honourary Counsel:

RE: Consultation on Draft REGDOC-2.9.1 *Environmental Protection: Environmental Assessments* (the "Proposed Regulatory Document")

Arthur C. Pape
(1942 – 2012)

I am writing on behalf of the Saugeen Ojibway Nation ("SON") to express concern with the consultation process that CNSC has set out respecting the Proposed Regulatory Document, and to confirm our position that consultation on this matter is properly the subject of the ongoing consultation engagement between SON and CNSC.

Jennie Jack
(Non-Practicing)

As stated in the preface to the Proposed Regulatory Document, this document is intended to guide the Commission in determining "the scope and depth of EA documentation provided to Aboriginal groups [...] and the appropriate participation opportunities." It is clear that this document will speak to foundational issues of consultation and has the potential to shape CNSC's ongoing engagement with SON with respect to nuclear issues in SON Territory, both as nuclear regulator and as representative of the Crown. It is the position of SON that it is inadequate and entirely inappropriate that a document of such importance should be developed unilaterally by CNSC and that SON would be expected to provide only written comments and on a compressed timeline.

As we stated during the conference call between representatives of SON and CNSC on June 5, 2014, any engagement or consultation on the Proposed

Regulatory Document must reflect the history of SON – CNSC engagement and our ongoing efforts to address nuclear issues within the SON Traditional Territory, including those matters relating to future developments at the Bruce Nuclear Site. It is only within the context of this broader relationship between SON and CNSC that SON’s concerns with the Proposed Regulatory Document will be properly understood and addressed.

Again, as discussed in our conference call of June 5, we propose that this matter be put on the agenda for our next meeting so that we might discuss and agree to a plan for our review and engagement of the Proposed Regulations.

SON, through its Environment Office, will continue to work with CNSC staff to identify dates and plan for our next meetings.

Yours truly,



Alex Monem