

**From:** Ali,Nardia [Ontario] [mailto:Nardia.Ali@ec.gc.ca]

**Sent:** Wednesday, August 13, 2014 1:33 PM

**To:** Consultation

**Subject:** RE: The CNSC invites the public to comment on Draft REGDOC-2.9.1, Environmental Protection: Environmental Assessments

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To CNSC staff:

Please see below a few comments/suggestions from Environment Canada on REGDOC-2.9.1

Overall, the document communicates the process very well. Staff, however, offered the following comments for consideration (organized by document section and PDF page number):

- 5.3.2 – *Sequential environmental assessment and licensing process* (PDF p. 14): It refers to “significant time lapse” when discussing the time between an EA decision and license application. Has “significant” been defined? Is it two years, five years, etc?
- 5.4 – *Aboriginal consultation* (PDF p. 14-15): It is explained that the CNSC fulfils the role of Crown Consultation Coordinator and will support a whole-of-government approach to Aboriginal consultation. There isn’t, however, an explanation of how the CSNC will interact, coordinate, or collaborate with other federal government departments to fulfil this role. It would be helpful to explain this in more detail.
- 6 (PDF p. 15)– formatting error in the heading of this section
- Table 2, step 2 (PDF p. 16): – it is written as “... license application and project description”. But can’t a project description be submitted prior to a license application? If so, maybe the text should be changed to “...project description and/or license application”.
- Below Table 2, para 1 (PDF p. 16): Further explanation of the role of the MPMO would be beneficial. The existing explanation is very vague.
- Table 3 (PDF p. 19-20): There appear to be some inconsistent statements in the table. For example, one would assume that as the level of public participation increased, the amount of time allocated for public input on the EA report would increase. However, the public review and comment period transitions from 30-days for “very low” participation to 45-days for “low” participation to 30-60 days for “moderate” participation. Written as is, this implies that at least 45-days is required for low participation projects while as few as 30 could be authorized for moderate projects. Is this correct?
- 6, step 13 (PDF p. 23): There is no mention of non-public or closed hearings. These should be explained as well.

Please contact me should you have any questions or require additional information.

Nardia Ali

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