



July 30, 2014

Aurèle Gervais
Media and Community Relations
Canadian Nuclear Safety Commission
P.O. Box 1046, Station B
280 Slater Street
Ottawa ONTARIO K1P 5S9

Dear Mr. Gervais:

Thank you for allowing the opportunity to review and provide comment to the Canadian Nuclear Safety Commission's draft Regulatory Document 2.9.1 – Environmental Protection: Environmental Assessment (EA Regulatory Document). The EA Regulatory Document provides a better understanding of how the EA process is applied for projects regulated under the Canadian Environmental Assessment Act, 2012 (CEAA 2012) and/or the Nuclear Safety and Control Act (NSCA).

Saskatchewan acknowledges and commends the Commission's efforts since May 2013 to make the regulatory process more transparent, specifically with regard to the conduct of EAs under the NSCA. Saskatchewan also shares the Commission's objectives to protect the health, safety and security of Canadians and the environment. Likewise, Saskatchewan shares the Government of Canada's aim to move toward a "one-project-one-review" state in the EA process to reduce the costly internal and external regulatory burden resulting from duplicative administrative requirements. Such regulatory burden erodes competitiveness and can be a significant barrier to growth and investment.

Upon review of the EA process for those projects assessed under the CEAA 2012, we were encouraged to see that the Commission considers the pursuit of coordinated EA activities, where possible, with provincial and territorial jurisdictions. Such coordination of EA activities includes the delegation of an EA, or any part thereof to the province in accordance with section 26 of the CEAA 2012. The Province would like some greater clarity as to what this coordination of EA activities may look like.

We also note that the environmental assessment process outlined in the EA Regulatory Document for those projects that require review under the NSCA do not make provisions for coordinating review activities with the Province, including the delegation

of an EA, or any part thereof. We are confident that our provincial EA process would be more than adequate to support the Commission's environmental assessment of projects.

As you may know, the previous Canada-Saskatchewan Agreement on Environmental Assessment Cooperation expired in July 2012 when CEAA 2012 came into force. Currently an informal approach to harmonizing administrative EA requirements is being used between the Commission and the Province. We are open to discussions for exploring opportunities for a formal arrangement with the Commission to clarify and establish jurisdictional roles and responsibilities for the coordination of EAs for all projects in Saskatchewan. Such an agreement will be a big step towards the goal of "one-project-one-review" and would establish clear expectations for the public, industry and other stakeholders.

Thank you again for the opportunity to review the Commission's EA Regulatory Document. We look forward to future collaboration with the Commission to identify next steps to formally coordinate and streamline our EA processes to reduce duplication for industry and enhance efficiency.

Sincerely,



Erika Ritchie
Assistant Deputy Minister, Environmental Protection and Audit Division
Ministry of Environment

cc: Sharla Hordenchuk, Environmental Assessment Branch, Ministry of Environment

