



VIA EMAIL:  
CEAA.EARReview-ExamenEE.ACEE@ceaa-acee.gc.ca

December 22, 2016

Expert Panel  
Review of Federal Environmental Assessment Process

Dear Sir/Madam:

**Re: Written Submission of AREVA Resources Canada Inc. to Expert Panel**

AREVA Resources Canada Inc. ("AREVA") has been actively exploring for and mining uranium in Canada for over 50 years. AREVA firmly centers our strategy and our operations on the principle of sustainable development, and is committed to protecting the environment and building relationships with its stakeholders, including indigenous groups that have interest in our operations. As such, AREVA fully supports the legislative values imposed on projects by the regulatory processes in Canada

AREVA has been an active participant in the 2016 Expert Panel, submitting on the Draft Terms of Reference and presenting to the Expert Panel and participating in the public workshops in Saskatoon on September 19<sup>th</sup>. AREVA's position remains unchanged from the submissions. Furthermore, we note that we have been involved in and strongly support the detailed written submission to the Expert Panel by the Saskatchewan Mining Association on December 22, 2016.

As we previously stated, AREVA has extensive experience with the environmental assessment process, including as the project proponent in multiple environmental assessments that were triggered, in our view unnecessarily by the interpretation of the *Canadian Environmental Assessment Act, 2002* ("CEAA, 2002"). The lengthy environmental assessment process that was triggered under the CEAA, 2002 resulted in delayed or cancelled projects, and utilized significant internal and governmental resources. It is AREVA's overall position that the changes invoked by the CEAA, 2012 have improved the federal environmental assessment process. A large effort was put into discussions to improve the CEAA, 2002 and more time should be given before large scale changes are made to CEAA, 2012. Specifically the CEAA, 2012 introduced positive changes for project proponents related to timelines, identification of lead federal agencies and provided much needed certainty through clear identification of designated projects in the *Regulations Designating Physical Projects*.

Lastly, with respect to the United Nations Declaration on the Rights of Indigenous People, it remains our position that United Nations Declaration on the Rights of Indigenous People has far broader implications to Canada than environmental assessments and we believe this is a constitutional issue that must be addressed broadly by the Government of Canada.

Thank you for your consideration of our comments.

Regards,

A handwritten signature in blue ink that reads 'Lambalgen'.

Tammy Van Lambalgen  
Vice President, Corporate Affairs & General Counsel