

2016 Commission Meeting with Stakeholders

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Uranium Mining Industry Cannot Succeed Without Regulatory Certainty

- Certainty allows:
 - Better project proposals
 - Appropriate allocation of resources
 - Accurate budgeting
 - Ability to attract investment for projects
- Uncertainty creates:
 - Delays in licensing and other approvals
 - Misuse of resources
 - Disincentives to investment

Role of the Commission in Providing Regulatory Certainty

- Develop rules, policies, and guidance documents that provide industry a road map
- Ensure staff use existing rules, policies and guidance documents in measuring industry efforts
- Ensure that changes or updates to rules, policies and guidance documents are consistent with the Commission's risk-informed performance-based approach
- Defend its statutory authority under UMTRCA to implement and enforce EPA's generally applicable standards

The Role of Risk-Informed Regulations and Policies in Providing Certainty

- Industry experience with failure to utilize risk-informed decision-making
 - Higher fees and waste of both staff and industry resources due to focus on issues that are of low risk
 - See NMA Fee Comments for 2106 (Attachment A)
 - Significant delays in licensing, license renewals, and other project approvals
 - See AUC presentation from 2016 Uranium Recovery Workshop (Attachment B)
 - Chaos and Quagmires
 - See NMA 2015 letter on health physics issues (Attachment C)