

15 September 2017

The Honourable James Carr
Minister of Natural Resources
House of Commons
Ottawa, Ontario K1A 0A6

Sent via online portal to: http://www.discussionpaper.ca/submission-upload/survey_tools/file-upload

Re: IAGC Comments on *Environmental and Regulatory Reviews* Discussion Paper

Dear Mr. Carr:

The International Association of Geophysical Contractors (“IAGC”) appreciates the opportunity to comment on Canada’s proposed discussion paper, *Environmental and Regulatory Reviews*.

The IAGC is the international trade association representing all segments of the geophysical industry, including companies that provide geophysical services, data acquisition, data ownership and licensing, data processing and interpretation, and associated services and products to the oil and natural gas industry. IAGC member companies play an integral role in the successful exploration and development of onshore and offshore hydrocarbon resources through the acquisition and processing of geophysical data.

Our comments are focused on the regulation of the oil and gas and geophysical industries. As addressed in this letter, these proposed regulatory changes have the potential to seriously threaten the ability of our industries to explore and develop the oil and gas resources within Canada, if they are not implemented with caution and representation from all directly involved parties.

IAGC members understand the importance of designing regulations to provide a transparent, defined, and stable process for consistency and predictability within a project lifecycle. The IAGC supports modernizing and streamlining regulations for onshore and offshore oil and gas exploration and development in Canada so long as these regulations, and the process of developing impact assessments, are products of reasonable and efficient practices. It is important for each proposed process to have established timelines as they will ultimately affect project planning.

Coordinated reviews by all agencies involved, including the National Energy Board, the Offshore Petroleum Boards (C-NSOPB, C-NLOPB), and Lifecycle Regulators, will help reduce duplicative regulations and allow for more predictable and clearly defined regulatory processes. The current

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regulatory regime in Canada is lengthy and ambiguous, forcing many private investors to devote resources to other areas around the world where the processes are more predictable, in both time and cost. Continuing to add more regulations on top of the current process will only deter investment in Canada's already diminishing oil and gas market.

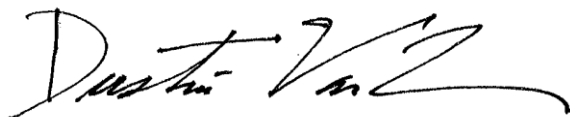
The IAGC believes the focus of early engagement should be on those stakeholders who are most likely to be directly affected by the proposed activity. The relationship between the industry, indigenous groups, landowners, and local communities is important to IAGC's members and open communication between the affected parties needs to be at the forefront of the early engagement phase. Allowing any and all parties to participate in the early planning phase who are not directly affected by the proposed activity may only increase the time and resources of the affected parties without accomplishing a meaningful outcome.

The elimination of "standing tests" for those wishing to participate in assessments is concerning to the IAGC. While it may be seen as limiting the voices of those who wish to express concern, it is unclear how the process of public participation within the assessments will be managed going forward. Similar to the early engagement phase, this could potentially dilute the voices of those who are directly impacted by the proposed activity. Less formal solutions, such as town hall meetings, open forums, etc. will allow those to voice concerns without a loss of timeliness in the process, once again, providing a more predictable and timely regulatory process.

The IAGC will continue to support a process that is comprehensive, transparent, consistent with the best available science, and fully informed by the public. To help the agency further these goals, we urge the government to continue to consult with industry and affected stakeholders when developing these regulations to ensure they are efficient, avoid duplication, based on the best available science, and do not create unnecessary financial and administrative burden.

Thank you again for the opportunity to comment on the Environmental and Regulatory Reviews Discussion Paper. Should you wish to discuss our submission in more detail, please do not hesitate to contact us.

Sincerely,



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