



# Canadian Natural

December 21, 2016

Johanne G  linas, Chair  
Environmental Assessment Processes Expert Panel

**Re.: Review of Environmental Assessment Processes**  
**Submission from Canadian Natural Resources Limited**

Dear Ms. G  linas

Canadian Natural appreciates the opportunity to provide a submission to the Expert Panel as part of the Government's review of the federal environmental assessment process under the *Canadian Environmental Assessment Act* (CEA Act). Canadian Natural recognizes the importance of ensuring that Canadians have confidence in environmental and regulatory processes that underpins responsible development of our energy resource and associated infrastructure.

As a member of the Canadian Association of Petroleum Producers (CAPP), Canadian Natural was actively involved in the preparation of that submission. As such, Canadian Natural wishes to convey to the Panel that we support the CAPP submission and that it represents the position of the oil and natural gas industry. As one of Canada's largest oil and natural gas producers, however, Canadian Natural also wanted to take the opportunity to highlight five specific points.

1. In-situ oil sands projects should not be listed in the *Regulations Designating Physical Activities*. Provincial regulatory bodies have extensive experience in relation to assessing and regulating in situ oil sands projects. This includes a well-developed understanding of in-situ technologies and their environmental impacts, as well as the effectiveness of mitigation measures and monitoring programs. In addition, provincial regulators have established comprehensive aboriginal consultation and public engagement requirements that are in place for the full life cycle of the project to foster transparency.

2. By using the best placed regulator, government, industry, and Canadians can be confident that the process will be managed in the most effective and efficient way. The provinces have jurisdiction over resource management decisions and are generally best placed, given their skills, knowledge and context, to regulate and manage resource development EA's.

3. We continue to support the concept of "one project, one assessment". To that end, we appreciate the Prime Minister's intent to work with provinces and territories to avoid duplication as highlighted in the Minister of Environment and Climate Change Canada's mandate letter.

4. The federal environmental assessment process should focus on understanding the environmental and socio-economic effects of a project and not be used as a mechanism to introduce or develop new policy. To address broader policy issues, the Panel has suggested an interest in considering the use of Regional Environmental Assessments and Strategic

**Canadian Natural Resources Limited**

Suite 2500, 855 – 2 Street SW Calgary, Alberta, Canada T2P 4J8 T 403.517.6700 F 403.517.7350 www.cnrl.com

Environmental Assessments. Canadian Natural is open to the concept, but remains concerned that if not properly defined, these assessments could introduce further complexity and serve as a further layer of decision-making and increase uncertainty for all parties. Any consideration of these tools should be studied with significant consultation and caution to ensure there are no unintended consequences and that they are aligned with the desired outcomes of an effective, efficient, and transparent regulatory process.

5. The EA decision-making process must be subject to predictable and reasonable timelines. Large projects that would be considered for a federal environmental assessment process under the CEA Act require significant financial commitments and long lead times. Transparent decision making and process certainty are a pre-requisite for companies as they consider the development of projects that lead to economic benefits for Canada.

Overall, it is important that Canada's environmental and regulatory processes provide clarity, transparency, and certainty. These are important factors that influence investor confidence, which is critical to attracting the investment needed to responsibly develop our energy resources in a manner that benefits all Canadians.

As a responsible operator, Canadian Natural maintains close relationships with the communities near our operations. We work closely with the more than 55 Aboriginal communities near our operations across Western Canada, to strengthen mutual understanding, enhance co-operation and build capacity for economic participation in our oil and natural gas projects. In 2015, Canadian Natural awarded over \$375 million in contracts and services to more than 150 Aboriginal businesses and contractors. In the context of Environmental Assessment processes, Canadian Natural is committed to engagement and appropriate involvement of directly and adversely affected parties.

Again, Canadian Natural appreciates the opportunity to provide input to the panel. Please feel free to contact me directly if you would like to discuss any of the comments in this submission further by email at [Bill.Clapperton@cnrl.com](mailto:Bill.Clapperton@cnrl.com).

Yours truly,



Bill Clapperton,  
Vice President – Regulatory, Stakeholders and Environmental Affairs  
Canadian Natural Resources Limited