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**Re: Phase 3 of the Frontier and Offshore Regulatory Renewal Initiative (FORRI)**

Thank you for the opportunity to provide comment on the Proposed Policy Intention Document for Phase 3 of the development of the *Framework Regulations*.

Given the importance of the petroleum industry to Canada, regulatory effectiveness is crucial for both increased and continued exploration and development.

The Prime Minister has stated that Canada remains committed to a rigorous, science-based approach to managing offshore oil and gas resources.

Amongst the objectives of FORRI Phase 3 are approaches similar to those we may consider when updating our *Oil and Gas Operations Act* (OGOA), such as “Moving to performance-based requirements instead of prescribing specific technologies/approaches” and “Bringing standards up to date where they are required”.

It is our understanding that, although FORRI’s stated goal is to modernize existing regulations, the major undertaking of this initiative in fact is that the participating governments are working to amalgamate the five operational regulations that pertain to installations, operations, geophysical activities, certificate of fitness, and drilling and production. As result, the five existing Regulations under Canadian Oil and Gas Operations Act (COGOA) are being converted to five Parts in the consolidated *Framework Regulations*.



The proposed policy document seems to be occupied mainly in presenting the policy contents of each of the existing Regulations. However, it does not clearly indicate what the new or changed policies are that it wishes to address through the FORRI initiative.

In order to be able to do parallel comparison of Regulations under OGOA and the *Framework Regulations*, we may need to wait until the FORRI finalizes its proposed regulatory amalgamation and shares the draft regulations.

It is our hope that more clarification of the policy intent and proposed changes to the current regulations will be included in your forthcoming documents to allow the GNWT to provide specific and targeted feedback from a policy perspective.

The GNWT would like to have another formal opportunity to comment on the entire draft regulation in Spring 2018.

Once again, we thank NRCan and the FORRI team for the opportunity to provide feedback and we look forward to continued discussion on this important initiative.

If you have any questions on this submission please let me know directly. We look forward to our continued engagement with the FORRI team, and would be happy to meet and discuss next steps in the FORRI initiative.

Sincerely,

A handwritten signature in black ink that reads "IAN BURROWS". The signature is written in a cursive style with a long horizontal stroke extending to the right.

FOR

Menzie, McEachern  
Director, Petroleum Resources

