

**1.) What's working well in relation to the OPR, and its implementation, and what could be improved?**

What is working well is that the CER is beginning to integrate and contribute to the advancement of reconciliation with Indigenous People. This is a step in the right direction, and through consultation it seems that the CER is beginning to understand what values are important to Indigenous peoples. As an example, Archaeological sites, traditional land use areas (such as harvesting areas, gravesites, gathering sites, ceremonial, and burial sites), are very important to Indigenous peoples. Any policies and enforcement applicable to the protection of these sites is working well. However, more work needs to be done to address ongoing reconciliation efforts.

**2.) How can the OPR contribute to the advancement of Reconciliation with Indigenous peoples?**

Similar to question 1, the OPR can contribute to the advancement of reconciliation with Indigenous peoples by implementing policies and enforcement that protect the interests and values of Indigenous Peoples, such as their Archaeological sites and traditional land use areas. Consultation should turn into engagement, and Indigenous Nations should have input into the creation of such policies and monitoring of these policies.

**3.) How can the OPR contribute to the protection of heritage resources on a pipeline right-of-way during construction, and operations and maintenance activities?**

Without proper monitoring and enforcement, policies in place are useless. Several companies and workers on the job do not understand the importance of heritage resources for Indigenous Peoples and may not even know what this term means. Proper training and education for workers doing the job should be mandatory and enforced in each company's 'culture,' or 'mandate.'

**4.) How can the OPR contribute to the protection of traditional land and resource use, and sites of significance for Indigenous peoples on a pipeline right-of-way, during construction, and operations and maintenance activities?**

-Knowledge and awareness to workers and contractors or historic and contemporary Indigenous land uses in the project area

-engagement with local communities on how they see sites being mitigated

-Indigenous monitoring on the work site to ensure proper mitigation and protocol are being followed by contractors and workers.

**5.) How can the use of Indigenous Knowledge be addressed in the OPR?**

-Engage with communities on what Indigenous knowledge they would like to share. Do not share any information without the written consent from communities. If the community agrees to share traditional knowledge in the OPR, make sure it is valued just as much as western science, verify the information with communities before submitting it in the OPR.

**6.) How can the OPR address the participation of Indigenous peoples in pipeline oversight?**

There needs to be adequate consultation and engagement with Indigenous communities and a section in the OPR should include traditional values, knowledge and concerns/mitigations or recommendations by these communities.

**7.) How can the OPR support collaborative interactions between companies and those who live and work near pipelines?**

Holding informational sessions for the community, presented by companies, so communities can understand what is going on in their neighborhood and meet some of the workers involved in projects.

**8.) How could communication and engagement requirements in the OPR be improved?**

As a community organization, we don't really receive updates from the CER regarding the OPR or other projects CER deals with. Regular email communication, especially on projects happening near the community's traditional area would be helpful in increasing communication and engagement.

**9.) How could the CER improve transparency through the OPR?**

Notify communities or community organizations via email/phone call regarding policy change, emergency spills/ incidents, companies who were not compliant, information on new projects etc.

**10.) Gender and other intersecting identity factors may influence how people experience policies and initiatives. What should the CRE consider with respect to:****a.) Those people implementing the OPR; or**

The people implementing the CRE need to take into consideration not only gender, religious, gender diverse groups and men and women, but also different cultural factors especially related to Indigenous people. A specific topic is Missing and Murdered Indigenous women, especially with the influx of outside contractors and workers in communities.

**b.) Those people who are impacted by the operational activities addressed in the OPR?**

They need to respect communities who are directly impacted by operational activities, especially vulnerable communities. They can do this by working with the communities to provide information on potential impacts and allow for communities to have a voice in project decisions if it's affecting their community and territory.

**11.) How can the OPR support a predictable and timely regulatory system that contributes to Canada's global competitiveness?**

Not sure, we would need more information on this topic to make recommendations.

**12.) How can the OPR support innovation, and the development and use of new technologies or best practices?**

Not sure, we would need more information on this topic to make recommendations.

**13.) What company-specific or industry-wide performance metrics could the CER consider to support enhanced oversight and transparency for CER-regulated facilities?**

Not sure, we would need more information on this topic to make recommendations.

**14.) Are there opportunities within the OPR for data and digital innovation that could be used by the CER and by companies regulated by the CER?**

For changes in pipeline use, an application should be made to the CER by the company as if it's a new project. Changes in pipeline use can bring on completely new safety and environmental hazards that may impact Indigenous Peoples use of the land, their harvesting rights, and cultural resources.

**15.) How can the OPR be improved to address changing pipeline use and pipeline status?**

-Provide ample notice and engage with Indigenous communities, trappers etc. who are affected by pipeline changes and the status of pipelines.

**16.) What further clarification, in either the OPR (e.g. structure or content), or in guidance, would support company interpretation and implementation of management system requirements?**

Not sure, we would need more information on this topic to make recommendations.

**17.) How should information about human and organizational factors, including how they can be integrated into a company's management system, for both employees and contractors, be provided in the OPR, and/or described in related guidance?**

Not sure, we would need more information on this topic to make recommendations.

**18.) How can the OPR improve the connection between company safety manuals and the overarching Safety Management Program, for both employees and contractors?**

Everybody who is working on a Project, whether contractors, employees etc. need to be on the same page regarding safety. If there are different manuals this may confuse everyone on what procedure to follow.

**19.) How can respect and personal workplace safety be assured at CER regulated sites?**

Besides safety certifications, ongoing testing of this knowledge, and monitoring of safe practices may help to ensure respect and personal workplace safety are being followed.

**20.) How should the CER be more explicit about requirements for contractor management?**

- 1.) Ongoing awareness and education
- 2.) Ongoing training
- 3.) Ongoing monitoring
- 4.) Ongoing enforcement