



Canada Energy Regulator
Onshore Pipeline Regulations Review Project Team
opr-rpt@cer-rec.gc.ca

RE: Onshore Pipeline Regulations Review

To Whom It May Concern,

Thank you for the opportunity to submit comments on the Onshore Pipeline Regulations Review as part of the Canada Energy Regulator Act, 2019. Conservation Ontario represents Ontario's 36 Conservation Authorities, which are local watershed management agencies, mandated to ensure the conservation, restoration and responsible management of Ontario's water, land and natural habitats through programs that consider human, environmental, and economic interests and needs.

Under the Clean Water Act, 2006, the Source Protection Authorities (SPAs) in Ontario are the 36 conservation authorities, Severn Sound Environmental Association and Municipality of Northern Bruce Peninsula. These SPAs support the science and policy development, and implementation of local Source Protection Plans for the protection of municipal drinking water sources.

Onshore Pipeline Regulations may impact drinking water threat activities, and how they are addressed under the Clean Water Act, 2006.

The following comments are submitted for your consideration based upon a review by conservation authorities (CAs) in the capacity of SPAs. These comments reflect the collective considerations of CAs and are not intended to limit consideration of comments shared individually by CAs.

General comments:

We are encouraged by this substantial process review by the Canada Energy Regulator (CER) Agency. The focus on improving processes for communication and activities through a consultation process is appreciated.

Conservation Ontario would expect that, at a minimum, to protect **existing and future** drinking water sources, the CER should ensure that drinking water source protection is considered as a risk factor in their regulatory decision-making framework.

Section 3. Engagement and Inclusive Participation

The OPR discussion paper has identified several opportunities for improved engagement and communication in both existing and proactive approaches. We recommend that the additional conditional responsibilities include engaging with SPAs.

Areas where improved two-way communication /engagement would benefit both the CER and SPAs include:

- proactive engagement with SPAs regarding pipeline planning (new locations), construction activities and/or maintenance practices to ensure that local source protection plan policies are adhered to;
- opportunities for education and outreach to ensure SPAs have a greater understanding of, and involvement in, a company's emergency management processes; and
- the potential to harmonize liquid hydrocarbon pipeline policy concepts for Regulators such as the CER across Source Protection Plans in Ontario.

Section 4. Global Competitiveness

Data and Digital Innovation

Conservation Ontario supports the CER's interactive pipeline map (<https://www.cer-rec.gc.ca/en/safety-environment/industry-performance/interactive-pipeline/>) to identify incidents and provide information to the public. We encourage the CER to ensure that the data be updated on a regular basis.

Change in Pipeline Use and Status

Conservation Ontario strongly encourages the CER to consider including a requirement for pipeline owners to notify SPAs when a company plans to move and/or permanently end the operation of a liquid hydrocarbon pipeline or as the CER Act refers to it as, "leave to abandon" the pipeline.

Thank you for the opportunity to review and provide comments on the Onshore Pipeline Regulations Review. Should you have any questions regarding the above comments and questions, please contact me directly [REDACTED]

Sincerely,
[REDACTED]

Source Water Protection Manager

c.c. All Conservation Authorities' Source Water Protection Project Managers

Conservation Ontario
120 Bayview Parkway, Newmarket ON L3Y 3W3
Tel (905) 895-0716 Fax (905) 895-0751
Cell: 1-905-251-2802