Enhancing Assurance

Report and Recommendations of the Regulatory Enhancement Task Force to the Minister of Energy
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Message From The Chair

Diana McQueen, MLA
Chair, Regulatory Enhancement Task Force

December 31, 2010

Dear Minister Liepert:

It is my privilege to present the final report and recommendations of the Regulatory Enhancement Task Force.

This work builds upon a series of near-term enhancements (listed in Appendix A) that have been made to Alberta’s current regulatory system, while ensuring environmental, health, and public safety outcomes are not compromised.

In its June 2010 report, Enhancing Assurance: The First 90 Days, the Task Force identified how these near-term enhancements have improved the current system’s efficiency and effectiveness. They have also resulted in substantial financial savings for resource developers and the Government of Alberta, which can be re-invested into our province to create jobs and opportunities, and enhance quality of life for all Albertans.

Based on this strong foundation, the Task Force has undertaken a comprehensive review of the entire regulatory system through the Regulatory Enhancement Project. This review has been about the “big picture” – about how we can and must improve the fundamental structure of Alberta’s system so that it will deliver the results Albertans expect while ensuring Alberta is a competitive place to invest in upstream oil and gas.

To this end, the Task Force recommends an enhanced Policy Development and Policy Assurance System for upstream oil and gas. These enhancements go beyond making and applying regulations in the same old ways.

This enhanced system will bring about greater coordination and integration in the way the Government of Alberta develops natural resources policies. It will feature a consistent, simplified process for assuring that the intent and desired outcomes of these policies are achieved. It will encourage the use of innovation – on the part of industry and government – to continuously improve performance, including environmental performance, and it will provide for the use of a broader range of policy tools to assure our province’s desired social, economic and environmental outcomes.

The recommendations in this report will result in a system that is effective, efficient, adaptable, predictable, fair and transparent. The recommendations have been informed by input gathered through a broad engagement process that involved the participation of the oil and gas industry, landowners,
environmental non-governmental organizations, municipalities, other stakeholders, and First Nations. On behalf of the Task Force members, I wish to thank the participants for their perspectives, guidance and ideas.

I personally want to thank my two Task Force colleagues, Evan Berger and Cal Dallas, for the exceptional leadership they have provided on this project. The success of this project has been in having the four departments come together to provide solutions for an enhanced, effective, efficient, and renewed process.

I would also like to thank the dedicated staff of the Government of Alberta who worked hard to address this large and complex task and whose expertise was invaluable. The proposed enhanced system will require substantial capacity in terms of skills, knowledge and technical experience. The staff of the Government of Alberta will be critical to its success.

Finally, the Task Force wishes to stress the urgency behind its recommendations so that we can address the outstanding issues and realize the benefits an enhanced system will bring to the province.

The current regulatory system has served our province’s needs in the past, but we now face a busier and more complex landscape and increased international competition. Alberta must change to realize its full potential.

If Alberta is to maintain its competitiveness in upstream oil and gas, and Albertans are to realize the full benefits of Alberta’s oil and gas resources, then our province must have a Policy Development and Policy Assurance System that meets our current and future needs, and achieves the results Albertans expect.

Sincerely,

Mrs. Diana McQueen
MLA for Drayton Valley-Calmar
Parliamentary Assistant for Energy
Enhancing Assurance envisions a renewed Policy Development and Policy Assurance System for our province, and sets out an enhanced approach to the way government develops and assures policies around upstream oil and gas. The enhanced system will encourage innovation, have clear and predictable processes, enhance our province’s competitiveness and, most importantly, achieve the results Albertans want.

The benefits Albertans derive from our province’s oil and gas resources flow through countless aspects our society: employment and income, health care, education, technology, infrastructure, community organizations and more. They wish to realize the full benefits of our province’s oil and gas resources, without compromising health, safety and environmental management.

Albertans place high expectations on industry and on the Government of Alberta in regards to upstream oil and gas development. They expect development to occur in ways that minimize impacts on the environment, protect public safety and conserve the resource base.

Moreover, Albertans expect companies to continuously improve their environmental performance, as a way of doing business, through greater innovation and the use of best practices. Industry must also guard against risks in the way they work and, in the event something goes wrong, take responsibility and make it right again.

The enhanced system proposed in this report will help ensure industry and the Government of Alberta meet these expectations, while keeping our province competitive.

This is not about cutting corners. It is about cutting clutter so that the Government of Alberta delivers assurance for Albertans more efficiently and effectively, and with greater transparency and accountability. High environmental standards will be maintained and Albertan’s ability to participate in the regulatory process will be preserved.

The recommendations in this report reflect input gathered through a broad engagement process. This went well beyond industry. It included environmental organizations, landowners, municipalities and First Nations.

Collectively, they helped identify opportunities for the Government of Alberta to step up its game: to enhance policy integration, to improve regulatory processes, to enable and encourage more innovation, and to better engage the public in developing policy.

Most of all, they called for a system that will maintain and build public trust and confidence in how upstream oil and gas development occurs in our province.

Enhanced Assurance lays out a path towards that system.
Introduction

Energy development is expected to remain a cornerstone of Alberta’s future economic growth. Over the next 25 years, upstream oil and gas development in Alberta has the potential to add $2.5 trillion in new economic activity, creating millions of person-years in jobs and contributing to sustained prosperity for our province.\(^1\)

Upstream oil and gas supports Alberta in other ways as well. It is a mainstay of many communities across the province, generating income that supports the retail, hospitality, construction and other sectors. Resource companies and their employees support a variety of community, nonprofit and voluntary organizations.

Research and innovation by industry give rise to new technologies that are transferable to other contexts, improving the quality of life of Albertans and enhancing Alberta’s ecosystems. Revenues from oil and gas development help pay for important services such as education, health care and infrastructure, and enable Albertans to benefit from competitive taxes.

Realizing the full benefits of our oil and gas resources depends on Alberta’s ability to continue attracting significant levels of investment. As part of broad efforts under the Alberta Competitiveness Act, the Government of Alberta is working to enhance Alberta’s competitiveness.

In response to changes in the marketplace, Alberta Energy led a study of Alberta’s investment competitiveness for oil and gas development.

In March 2010, the government reported to Albertans in *Energizing Investment: A Framework to Improve Alberta’s Natural Gas and Conventional Oil Competitiveness*, which summarized the findings this study. It outlined a series of actions and initiatives to position Alberta as one of the most competitive jurisdictions in North America for upstream oil and gas development.

As a result of these efforts, the Regulatory Enhancement Project (REP) was established. The objective of the REP was to examine ways of ensuring Alberta’s regulatory system for upstream oil and gas is modern, efficient, performance-based and competitive, while maintaining Alberta’s strong commitment to environmental management, public safety and responsible resource development.

### Enhancing Alberta’s Competitiveness

A key issue identified in *Energizing Investment* was the need to improve Alberta’s regulatory system for oil and gas development. To remain competitive, Alberta needs an effective regulatory system that delivers the results Albertans want, and that provides clarity, predictability, certainty and efficiency.

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\(^1\) Upstream oil and gas development are those activities which occur for the exploration, extraction, transportation, and processing of oil and natural gas from the initial acquisition of petroleum and natural gas leases and licences, through to the sales outlet at oil and natural gas facilities.

To take action on these goals, the Minister of Energy established the Regulatory Enhancement Task Force (the “Task Force”). Members of the Task Force are:

- **Diana McQueen** (Chair), Parliamentary Assistant to the Minister of Energy and MLA for Drayton Valley-Calmar.
- **Evan Berger** (Vice-Chair), Parliamentary Assistant to the Minister of Sustainable Resource Development and MLA for Livingstone-Macleod.
- **Cal Dallas** (Vice-Chair), Parliamentary Assistant to the Minister of Environment and MLA for Red Deer South.

The Task Force was mandated to implement a comprehensive review of Alberta’s regulatory system for natural resource development, with a focus on upstream oil and gas. An important aspect of the review process was engagement with stakeholders and First Nations.

The Task Force was instructed to make recommendations in the following areas:

- **Policy Integration Framework**
  Recommendations to resolve any gaps, overlaps, inconsistencies and duplications in Alberta’s strategic provincial policies around the oil, gas and oilsands sectors, and potentially other resource sectors.

- **Policy Assurance System**
  Recommendations for an enhanced policy assurance (regulatory delivery) system with performance measures and benchmarks.

- **Implementation Strategies**
  Recommendations on the critical issues relating to implementation of an enhanced system.

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The system must allow for improved coordination and integration, with a view to achieving Alberta’s social, economic and environmental goals. It must be a system that delivers the results Albertans expect, yet enables our province to remain one of the most competitive places to invest.

Creating this modern system has been the focus of the REP.

**The Regulatory Enhancement Project**

The REP has focused on developing an enhanced Policy Development and Policy Assurance System for upstream oil and gas. The system is used by government to develop sound public policy for upstream oil and gas, and to assure the intended results of those public policies are being achieved.

Albertans wish to realize the full benefits of Alberta’s oil and gas resources, but they expect development to occur responsibly. This includes minimizing environmental impacts, protecting public health and safety, and conserving Alberta’s resource base.

The REP has taken a “big picture” view. It has considered how Alberta’s system should best be structured to deliver these results, while ensuring Alberta remains a competitive place to invest.

This has involved a comprehensive review of the processes used by the Alberta government to develop, implement and ensure compliance with provincial policies around upstream oil and gas development. A list of the areas within and outside the scope of the REP is provided in Appendix B.

Important to note is that the REP did not examine specific policy choices established by the Alberta government around upstream oil and gas development. Rather, the REP examined the overall system used to support those choices.

The REP also did not include an examination of First Nations consultation processes. The Government of Alberta is currently engaged with First Nations in a review of Alberta’s First Nation Consultation Policy on Land Management and Resource Development and associated guidelines and is committed to consulting with First Nations in accordance with this policy. The government is committed to fulfilling its legal obligations to First Nations.
Developing An Enhanced System With Albertans

Sponsored by Alberta Energy, the REP was undertaken by a team of government representatives from Alberta Energy, Alberta Environment, Alberta Sustainable Resource Development, the Energy Resources Conservation Board and Alberta Justice and Attorney General.

Gathering Input to Inform System Design

The recommendations developed through the REP are the result of a thorough process that has involved considerable research, engagement and analysis.

Background research was undertaken to inform the project. This included a review of Alberta’s current regulatory landscape, existing Alberta government initiatives, and previous reports regarding the regulation of resource development. In addition, the regulatory systems of other jurisdictions were examined, particularly those of British Columbia and Saskatchewan. The project also looked at the suite of regulatory and non-regulatory tools that are available to achieve outcomes.

Building on this research, the REP identified key project objectives. It also established a set of draft principles, based on competitiveness drivers, to guide the design of an enhanced system. The REP then undertook a system-level review of the entire upstream oil and gas project lifecycle.

Informing this effort were three rounds of engagement with stakeholders and First Nations, conducted during the months of April through November 2010. All 47 First Nations and the three Treaty Organizations were invited to participate. Key stakeholders invited to participate included landowners, officials of municipal governments, and representatives from environmental non-governmental organizations, the upstream oil and gas industry, and other interest groups.

Between March 31 and October 1, 2010 the REP hosted three rounds of engagement through a series of briefings, meetings, workshops and a forum. The stakeholders and First Nations provided input on:

- Issues and opportunities to improve the current regulatory system and the principles that should guide system design, in round one;
- Early work on potential enhancements to the system, in round two; and
- Preferred system enhancements, in round three.

In addition, a REP website was created as another method of communicating with Albertans and accepting their feedback.

A list of engagement events and dates and a list of those invited to participate in the engagement process are provided in Appendix C. Some participants in the engagement process spoke on behalf of their organizations, while others shared their personal views as individuals.

Using this, the REP team refined the design principles and examined potential enhancement options that could address identified issues and challenges in the current system. Based on project objectives, the design principles and cross-ministerial guidance, these options were further assessed and a set of preferred system enhancements was developed.
Greater detail around the REP work process is available in two companion reports:

- *Regulatory Enhancement Project: Stakeholder and First Nations Engagement Summary*, a summary of input gathered through the engagement process.
- *Regulatory Enhancement Project: Technical Report* - a detailed examination of the enhancement options identified, considered and evaluated by the REP.

**What We Heard About Improving the System**

Through the engagement process, participants identified a number of areas for improvement in the current system:

- **Simplify the system.**
  The current system involves multiple regulatory bodies, each with different processes. Simplifying the structure and using consistent processes would improve the system’s navigability and transparency.

- **Enhance policy clarity.**
  A higher degree of collaboration is needed to ensure policies are consistent and work together effectively. Policies must also be clearly communicated so that they are applied more consistently.

- **Improve public engagement processes.**
  The system needs to provide opportunities for interested parties to have their voices heard – on specific projects that are proposed, and on broader public interest issues.

- **Enhance accountability.**
  There should be greater clarity on how the system operates, and regular measuring and reporting on how well the system is performing, including application response times.

- **Improve knowledge and information sharing.**
  Information needs to be shared more effectively. This would improve coordination, reduce duplication, address emerging issues more proactively, and encourage continuous improvement.

- **Ensure risk is assessed and managed throughout the system.**
  Decisions about upstream oil and gas development activities should be based on the level of risk involved. This would encourage greater innovation on the part of industry, while maintaining high environmental standards.

- **Set clear expectations.**
  The system should not act as a barrier to Alberta’s competitiveness, but should continue to set clear expectations for industry in regards to the environment, public safety and resource conservation.

These opportunities informed the development of preferred system enhancements and the resulting recommendations outlined in this report.
An Enhanced Policy Development And Policy Assurance System

Where We Are Today

Alberta’s regulatory system is intended to support the development of Alberta’s energy resources, while providing assurance in three key areas:

- **Environment**
  Ensuring Alberta’s vital environmental resources, air, water, land and biodiversity, are managed appropriately.

- **Public safety**
  Ensuring development does not compromise the health and safety of the general public.

- **Resource conservation**
  Preventing waste of Alberta’s resources from inappropriate practices (e.g., unnecessary flaring of natural gas) and providing for orderly development of oil and gas reservoirs in ways that ensure optimum recovery and equity.

In Alberta’s current regulatory system, responsibilities and authorities are distributed among several government entities:

- **Alberta Environment** develops policies regarding Alberta’s air and water resources and the reclamation and remediation of oil and gas facilities. The department also acts as a regulator in these areas.

- **Alberta Sustainable Resource Development** ( SRD) develops policies regarding Alberta’s forest resources, biodiversity, land-use and the management of public lands, and regulates these same areas.

- **Alberta Energy** develops policies regarding Alberta’s energy resources and is responsible for managing Crown mineral rights and royalties.

- **The Energy Resources Conservation Board** (ERCB) is responsible for regulatory delivery around oil and gas development activities.

  Parties wishing to undertake upstream oil and gas development must interact with all four entities separately, at various points and times in the project lifecycle. The pathway from application to approval is complicated and can result in delays. Roles and accountabilities can be unclear.

  While there is interaction among the four entities in developing policies and making decisions, information sharing is difficult and each entity uses distinct processes. This can result in policy gaps or conflicting policies, and inconsistent application of rules. It can also result in substantial duplication of effort in information gathering and reporting, leading to higher costs for industry and other stakeholders.

  Each entity also uses different protocols for engaging members of the public. This makes it confusing for stakeholders to determine how and when to best provide their input into the policy development and decision making process.

The current system also does not sufficiently encourage innovation or continuous improvement on the part of industry or government. It places a focus on approvals, rather than managing risks and achieving desired results.

Envisioning an Enhanced System

There are significant opportunities to enhance Alberta’s current regulatory system and bring about a **Policy Development and Policy Assurance System** for upstream oil and gas that is easier to navigate, is more predictable, sets clear
roles and responsibilities, and allows for better information sharing and continuous improvement.

The Policy Development and Policy Assurance System (an “Enhanced System”), as envisioned by the Task Force, is about more than making and applying regulations.

It refers to a system of coordinated and integrated processes and capacities that the Government of Alberta uses to develop policies and to provide assurance that the intended results of those policies are being achieved.

While regulations are an example of a policy assurance instrument, the Enhanced System employs greater flexibility and innovation through the use of a broader range of instruments and tools (such as market based mechanisms, performance standards, comprehensive auditing and other tools) to assure policy outcomes.

The Enhanced System features two components: a policy development component, and a policy assurance component. Each has clear roles and responsibilities.

In Alberta, elected officials are responsible for making decisions and setting policy, primarily through acts of the legislature.

The policy development component of the system involves the analysis and development of policy options around resource development. Through policies, the Alberta government establishes directions and priorities, and sets policy outcomes.

The policy assurance component implements policies and regulates upstream oil and gas development activities in order to achieve the policy outcomes set by government. This includes the use of decision-making, compliance monitoring and enforcement mechanisms.

The two components work together to ensure upstream oil and gas development occurs in ways that support Alberta’s social, economic and environmental outcomes.

For example, through policy development Alberta has established a policy framework for water allocation. Policy assurance processes use that framework to determine if a proposed project should receive a water allocation, and then to monitor compliance with regard to the conditions of the water licence.

Several common elements also provide an interface between the two components. These include: public engagement processes, information sharing, risk management, and compliance monitoring and reporting. These elements inform and support the two components, helping the overall system remain adaptable and ensure continuous improvement.
Recommendations For An Enhanced System

Effective
An effective system is able to demonstrate the integration of policy through the achievement of multiple outcomes expressed in multiple policies, resolve gaps, conflicts, and issues within Policy Development and Policy Assurance.

Efficient
An efficient system optimizes the effort required (cost, time, quality) by both the proponent and the public, makes oversight effort commensurate with risk of the activity, standardizes processes, interfaces and business rules, reduces the duplication of assurance effort, and coordinates and aligns decisions to reduce potential conflicts.

Adaptable
A system that is adaptable can accommodate new policies or issues without a system redesign, encourages innovation as standard practice, and communicates information through the system to generate new policy.

Predictable
A predictable system is responsive and easy for proponents and the public to understand, has clear accountability for decisions, and enables decisions to be made in accordance with the planning timelines for activities.

Fair
The fairness of the system speaks to procedural fairness, the availability of independent adjudication where it is required and clear communication and understanding of the issues that have been considered.

Transparent
Transparency indicates that the information used and the process followed to make a decision are available to all and that the system itself enables openness, communication, and accountability.

Through the REP engagement process, a number of opportunities have been identified to enhance Alberta’s current system. These include:

- Enhancing coordination and integration among Alberta government departments in the development of resource policies;
- Ensuring regulators are informed by clear and consistent policy guidance so that policy outcomes are more effectively assured;
- Ensuring stakeholders have meaningful opportunities to provide input into policies and decisions around upstream oil and gas development;
- Employing risk management in a consistent way throughout the system;
- Measuring and reporting on the performance of the system to Albertans to provide greater transparency and improve the accountability of the system;
- Ensuring that landowner agreements are respected and enforced.

The Task Force has developed a series of recommendations to capitalize on these opportunities and bring about an Enhanced System. These recommendations reflect the preferred enhancements that were identified through the REP process and that best fulfill the design principles established for the review.
Given today’s busier and more complex landscape, it is essential that policies and policy outcomes around natural resource development are clear, consistent and integrated. They must reflect a balance of perspectives and work together effectively, without gaps or conflicts.

Policies regarding natural resources are currently developed by the SREM ministries: Alberta Energy, Alberta Environment and Alberta Sustainable Resource Development, which regularly engage in collaborative work to identify and address policy priorities within a policy framework that addresses sustainability, including economic, social and environmental factors.

However, the entire suite of natural resources policies has arisen incrementally over many years. Not all policies have been developed through the SREM process, and they are neither as consistent nor aligned as they should be.

Inconsistent policies can lead to inconsistent decisions. Inconsistency can also create uncertainty for industry, stakeholders and First Nations, and complicate Alberta’s efforts to assure environmental management, public health and safety, and resource conservation.

As identified by participants in the REP engagement process, there is an opportunity to enhance the integration of policies and provide clearer policy guidance to regulators.

The SREM Policy Management Office (SREM-PMO) would be accountable to SREM Ministers and Deputy Ministers for policy analysis and policy recommendations. Reporting directly to SREM Deputy Ministers the Office would have five key roles:

- **Policy Integration**
  The Office would work with all SREM departments to integrate natural resource policies and align them at the provincial and regional levels. It would also coordinate with other ministries and agencies having authority for decisions that impact on oil and gas activities.

- **Stewardship and Oversight**
  The Office would provide an interface between the policy development and policy assurance sides of the system, enabling two-way communication and the provision of clear Government of Alberta policy guidance to regulators.

- **Stakeholder Engagement**
  The Office would support an enhanced and coordinated approach to public engagement activities in SREM departments, to enable public input to inform policy development (see Recommendation 3).

- **Monitoring and Reporting**
  The Office would develop performance measures and assess performance of the Enhanced System to support SREM Ministers. It would also support periodic arm’s-length reviews of the system (see Recommendation 5) and reporting to government, regulated entities and the public.

- **Interface for Federal and Interprovincial Policy Issues**
  The Office would provide a coordinated interface for SREM on policy development and policy assurance issues in relation to the federal government and other provincial governments.
The SREM-PMO would help ensure Alberta’s natural resource policies are clear, consistent and integrated; reflect a balance of SREM perspectives; and support the achievement of Alberta’s social, economic and environmental outcomes.

The Policy assurance functions relating to oil and gas are currently distributed among Alberta Environment, SRD and the ERCB. All three perform policy assurance functions throughout the project lifecycle, but with limited coordination.

While this approach has worked in the past, participants in the REP engagement process identified many opportunities for improvement. These include:

- **Less complexity and more transparency.**
  Having responsibilities distributed among many bodies makes the system complex and less transparent. The pathway from application to approval should be straightforward and clear.

- **Clear and consistent policy guidance.**
  Having coherent and consistent policy guidance would result in more consistent decision-making. It would also result in reduced duplication and stronger coordination of applications, approvals, monitoring, compliance and other assurance activities throughout a project’s lifecycle.

- **A single point of contact.**
  The policy assurance process should have a single point of contact for submissions, receiving responses and accessing information more easily.

- **Strengthened accountability.**
  Albertans want to know clearly who is responsible for policy assurance. They want a system that ensures industry remains accountable in its development activities, and ensures government remains accountable to the public for providing oversight of industrial activities.

The Enhanced System should provide a simplified, consolidated and clear process for undertaking upstream oil and gas development activities, while maintaining high standards for responsible development.

Accordingly, a single regulatory body should have responsibility for delivering policy assurance (i.e. regulatory delivery) of upstream oil and gas development activities.

While other structural options have been considered, including a “one window” approach, the move to a single regulator would be most consistent with the REP design principles. It would enhance efficiency and effectiveness, and provide greater transparency in decision-making. It would also result in enhanced fairness and accountability by clearly separating and delineating responsibilities for policy assurance and policy development.

The single regulator would be established as a new organization, building on the existing foundation of the Energy Resources Conservation Board (ERCB). It would assume all policy assurance functions currently undertaken by Alberta Environment, SRD and the ERCB, related to upstream oil and gas, and therefore its mandate would be much broader.

**Recommendation 2**

Establish a single regulatory body with unified responsibility for policy assurance (regulatory delivery) of upstream oil and gas development activities.
than that of the ERCB. Successful implementation will require a new culture and supporting systems for the new single regulator.

The single regulator would have unified responsibility for the regulatory functions required to issue upstream oil or gas project approvals, and to monitor compliance with approvals. This would include decisions and procedures relating to:

- The disposition of public lands, consistent with policies regarding public lands;
- Licensing of water, consistent with established water allocation policies;
- Receiving, reviewing and responding to project applications;
- Reviewing Environmental Impact Assessments;
- Establishing any conditions on project approvals; and
- Post approval activities, including: variances, compliance monitoring, reporting, and reclamation and closure.

A single process would also be established for appeals of decisions, since these presently differ amongst the current regulatory entities.

The single regulator would also be required to establish review standards, including approval timelines, to provide more predictability to parties wishing to undertake development activities.

The single regulator will also need to work with a number of other Government of Alberta departments, such as Health and Wellness, Aboriginal Relations, Municipal Affairs, and Justice and Attorney General, to resolves issues as they arise.

To further enhance the policy assurance process, the single regulator would interface with SREM departments through the SREM-PMO (described in Recommendation 1). This will provide the regulator with clear policy guidance, while ensuring that policy development is informed by operational issues and expertise at the regulatory delivery level.

Recommendation 3

Provide clear public engagement processes that enable parties to engage effectively at the policy development and policy assurance stages.

Participants in the REP engagement process stressed that an Enhanced System needs to include a public engagement framework that is meaningful, robust and enables appropriate parties to provide input into policy development and policy assurance.

Clear public engagement processes that provide clarity and predictability for participants will enhance fairness, transparency, efficiency and effectiveness.

In the current system, it is difficult for interested parties to determine when and how to best provide input into policies and decisions.

Public engagement is conducted by individual agencies for multiple purposes, often without coordination across or within agencies. Stakeholders identified this lack of coordination as an issue, as it leads to ineffective and inefficient use of participants’ time and effort. It can also result in stakeholders being over-engaged on some issues and under-engaged on others.

Public engagement must be structured so that input from the public can effectively inform key decisions. This includes input on broad policy issues, such as environmental management and land-use, and on specific oil and gas activities that are proposed.
For instance, specified parties including landowners and others who stand to be impacted by proposed upstream oil and gas activities need the opportunity to continue to engage at the *policy assurance* stage when the regulator is considering the merits of a project application. To be clear, participation of landowners, and others with private interests, will not be changed.

Stakeholders wishing to influence broader policy questions – whether development issues, land-use issues, or others – will have greater opportunity to provide input at the *policy development* stage. This is the most appropriate stage where their input can influence the policy frameworks that will apply to all upstream oil and gas development activities.

The Enhanced System would provide clear public engagement processes at both the *policy development* and *policy assurance* stages and channel participants to the process best equipped to address their concerns.

At the *policy development* stage, a more robust and coordinated process would be established to enable stakeholders to provide input into the *policy development* process. This would ensure that stakeholder input on issues of “common interest” informs the development of Alberta’s natural resource policies. Common interest matters typically involve input on broad policy issues that apply to all upstream oil and gas activities. For example, policy issues such as environmental management, water use, or land-use.

Enhanced public engagement in the development of policy would be an ongoing, long-term commitment based on two-way communication. It would enable government to engage landowners directly affected as well as interested stakeholders and the public and involve Albertans at the most appropriate point in the process where their input can be most effective.

The SREM-PMO (as discussed in Recommendation 1) would facilitate and support a coordinated approach to public engagement and design engagement processes to suit the issue and the audience.

While common interest issues are most appropriately engaged at the *policy development* stage, the *policy assurance* stage will focus on private interest issues concerning proposed upstream oil and gas development activities. This will allow for public engagement at the *policy assurance* stage to be more focused and relevant to the merits of a project application.

Landowners, and others affected by a development, participate today at the policy assurance stage to raise issues regarding the impact of a project. The participation of those with private interests, including landowners, in the new single regulator’s decision process will be preserved.

With the move to a *single regulator*, a consistent process would need to be established to enable private interests, specified in legislation, to inform decisions made by the regulator. The separation of common and private interests will not take place until enhanced engagement processes are in place and may not be possible in all project reviews, and so the regulator will need some flexibility to deal with specific public interest matters from time to time.

Providing clear and robust public engagement processes at both the *policy development* and *policy assurance* stages will enhance the fairness, transparency, efficiency and effectiveness of the
entire system. It will provide better clarity and predictability for landowners, the general public and industry.

**Recommendation 4**

Ensure a systemic and common risk assessment and management approach is used across the entire Policy Development and Policy Assurance System.

A message very clearly delivered by participants in the REP engagement process was that an Enhanced System should maintain and enforce Alberta’s high standards for environmental management, public health and safety and resource conservation.

They also said Alberta’s system needs to be more innovative in fulfilling these objectives. Rather than doing things the same old ways, Alberta should encourage the use of new technologies and approaches, and encourage continuous improvement in environmental performance.

Alberta’s current system is largely focused on approvals. It uses a lot of “command and control” prescriptive regulations that state how things should be done. This “instruction-manual” style of approach leaves little room for innovation. It doesn’t easily allow for advances in technology or improved industry practices. It places emphasis on whether industry follows instructions, not whether better performance is achieved.

Increasingly, jurisdictions around the world are shifting to risk-management approaches. Examples include: the England & Wales Environmental Agency (United Kingdom); and the Australia Prudential Regulation Authority.4

*Risk management* is about making sure the level of regulatory oversight for an activity is appropriate for the level of risks involved in that activity.

All activities come with risks and there is no such thing as “zero risk.” But not all risks are the same. Some are more likely than others. Some are more serious than others.

Risks, however, can be assessed and managed. Depending on the nature, likelihood and potential impact of each risk, we can take appropriate steps to guard against it.

In the case of upstream oil and gas development, we need to manage risks to Alberta’s desired outcomes. For example, development might pose risks to the health of the environment, the health and safety of the public, or the long-term viability of the resource base.

While the SREM departments and the ERCB currently use risk management to varying degrees in their work, they each do so independently. The current system does not use a systemic or consistent approach.

Implementing a common *Risk Management Framework* would ensure a consistent process is followed through all parts of the system to better anticipate, assess and guard against risks, including those of a systemic nature, associated with upstream oil and gas development.

As part of its system design work, the REP has developed an Integrated Risk Management Framework that is based on the internationally

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recognized ISO 31000 Risk Management Standard.\textsuperscript{5}

At the policy development stage, the Risk Management Framework would be used to evaluate new and existing natural resource policies as they are developed and integrated. It would help assess risks to Alberta's social, economic and environmental outcomes and assist in determining the policy approaches needed to manage those risks.

At the policy assurance stage, the Risk Management Framework would be used to rigorously identify and assess risks associated with specific upstream oil and gas development and operational activities. The Risk Management Framework would help inform decision makers in the selection of appropriate policy tools to manage those risks, monitor industry compliance and support the achievement of Alberta's desired outcomes.

A key aspect of the shift to a common Risk Management Framework to support the Enhanced system is the use of a broader suite of policy assurance tools. This could include the use of outcomes-based regulations; market based instruments, which use market forces to bring about industry compliance; and industry standards and codes of conduct.

The nature and level of risk associated with an activity assists in determining which tool is most appropriate. Activities that require a higher degree of oversight may warrant the use of more prescriptive tools. Activities warranting lesser degrees of oversight may be managed with other tools that offer innovation and flexibility in achieving compliance.

\textit{In situ} oil sands projects are an example of how the Risk Management Framework may help enable the selection of more effective and efficient policy tools. The Government of Alberta has considerable knowledge about \textit{in situ} oil sands development from the review, approval, and oversight of more than 30 projects. Based on this experience, the Government of Alberta recognizes that \textit{in situ} development resembles conventional oil development more than it does mineable oil sands projects. Therefore, the Government of Alberta will streamline the environmental assessment process for \textit{in situ} projects, which will shorten approval times. Streamlining will involve the use of a broader set of policy tools and will be influenced by Regional Plans. Streamlining does not mean reducing social or environmental standards. It means ensuring regulatory oversight for an activity is appropriate for the level of risks involved.

The adoption of a common Risk Management Framework throughout the Enhanced System would ensure that Alberta maintains high standards and clear expectations, while allowing for innovation and continuous improvement on the part of industry.

Importantly, for the Risk Management Framework to be successful, the system will need to know whether risks are being managed and Alberta’s desired outcomes are being achieved. There must be a robust commitment to compliance monitoring and reporting. Third parties, such as environmental groups, have potential roles to play in monitoring and reporting activities. Industry also has important roles to play.

The Alberta government will need to ensure there are clear, consistent data collection standards to support these activities. For effective assurance,

\textsuperscript{5} ISO 31000 is produced by the International Organization for Standards, recognized worldwide by governments and industry.
data collected must be helpful in evaluating performance, be of reliable quality and be credible.

**Recommendation 5**

Adopt a Performance-Measurement Framework and a public reporting function to measure and communicate the effectiveness of the system and identify opportunities for continuous improvement.

It is essential the Enhanced System maintains and builds public trust and confidence. Albertans want to know whether the system is performing as it should, and whether it is accomplishing its objectives.

A *Performance-Measurement Framework*, along with a public reporting function, would measure and communicate the performance of the Enhanced System to regulated entities and all Albertans.

The *Performance Measurement Framework* would include the following elements:

- Formally defined performance measures that align with the system design principles and consider the economy, society and the environment;
- System benchmarks established internally and through comparison with other jurisdictions; and
- A system for monitoring and reporting of performance measures and continuous improvement of the framework.

As a unique option for supporting the *Performance Measurement Framework*, the Task Force proposes that the performance of the system as a whole be periodically reviewed by an arm’s-length panel of regulatory experts. This would not replace ongoing performance measurement or serve as a formal audit. Rather, it would provide an independent review to assure Albertans that the system is effectively and efficiently delivering on integrated policy outcomes. The SREM-PMO (as described in Recommendation 1) would play a role in supporting this arm’s-length review and associated reporting.

**Recommendation 6**

Ensure an effective mechanism to address landowner concerns is developed.

A concern raised by landowners is the lack of an efficient and effective mechanism to obtain redress when a company has either failed to perform or performed poorly with respect to agreements reached with the landowner at the time consent to enter the property was obtained.

Landowners enter into agreements with oil and gas companies that allow for the construction and operation of oil and gas projects on their lands. Often they are negotiated strictly between the landowner and the oil and gas company. In the majority of cases, landowner-company agreements are clear and each party understands its rights and responsibilities. However, when misunderstandings arise in regard to these agreements, landowners have expressed frustration in making sure companies fulfil their obligations created by the agreement.

It is recommended the Surface Rights Board or another body be given jurisdiction to examine and resolve such disputes through mediation or arbitration. Following the resolution of the dispute, the single regulator would be authorized to enforce the agreement using its regulatory tools.
Moving Forward

An Enhanced System in Action

The figure below graphically represents the Enhanced System for upstream oil and gas, reflecting the recommendations made by the Task Force.

Policy Development
- Develops integrated policies and policy outcomes.
- Enhanced public engagement to inform policy development.

Interface
- SREM Policy Management Office.
- Facilitates policy integration, policy guidance and communication between policy development and policy assurance stages.
- Ensures a common risk-management approach is used throughout the system.
- Supports and facilitates a coordinated approach to public engagement.

Policy Assurance
- Single regulator responsible for all assurance functions.
- Selects policy assurance tools.
- Provides single window of contact.
- Includes decision making and review/variance functions.
- Public engagement process to ensure private interest considerations inform decisions.

This enhanced system will delineate responsibility for policy development and policy assurance, providing stronger accountability. It will consolidate policy assurance functions in a single regulator, providing a single point of contact and consistent processes throughout the project lifecycle.

Transparent and robust processes for public engagement will be established at the policy development and policy assurance stages, so that parties can provide input into policies and decisions at the most effective points in the system.
Through the use of a systemic and common Risk Management Framework, and a formal SREM Policy Management Office, the entire system will ensure policies around upstream oil and gas are developed and applied in a coordinated and integrated fashion.

The use of a Performance-Measurement Framework and public reporting mechanisms will enable Albertans to know how the system is performing and how it can improve. This will ensure the system continues to support Alberta’s investment competitiveness and continues to meet Alberta’s desired social, economic and environmental outcomes.

Implementation Considerations

The Enhanced System will not be established overnight. Changing a system that been in place for decades will require careful and deliberate planning, adequate resources, and proper time to get it right. It will involve considerable culture change.

The Task Force has identified a number of key considerations for successful implementation of the recommendations made in this report:

Sustain leadership
While transforming the system will take time, there is urgency to this work. Alberta can not afford to maintain the status quo if our province wishes to achieve our desired social, economic and environmental outcomes. There will need to be sustained, robust and committed leadership from elected officials and senior levels of the Government of Alberta in making changes to the system.

Clearly communicate change
Since the system will continue to play a role in upstream oil and gas development, there will be an ongoing need to provide certainty to industry, landowners, other stakeholders, First Nations and all Albertans. It will be critical for the Alberta government to clearly signal the direction the system will take, and to clearly communicate what, how and when changes will be made.

Coordinate governance
Strong and consistent follow through will be critical for success. There are many interdependent parts of the current system that will undergo changes. These must be carefully coordinated so that the system continues to function effectively. In the course of implementation, several detailed policy questions will also need to be addressed.

An effective governance structure should be established with the authority for coordinating the implementation of recommendations. This would provide a clear responsibility that acts as a clearinghouse for decisions and ensures the government “speaks with one voice” with respect to the system’s enhancement.

Orderly change over time
Enhancement of the system will take time, and it must be done in an orderly fashion. An implementation “roadmap” should be established and announced at a very early point in the process. The roadmap should lay out a critical path for implementation, including deliverables and key milestones. This will provide greater certainty for industry and Albertans during the time of transition, and help implementation stay on track.

Public Engagement
Enhanced public engagement at policy development stage, to provide greater opportunities for public input, must be put in place before any changes are made in regards to separating common and private interests at the policy assurance stage.
Clearly identify processes during transition
A key challenge will be effectively transitioning to new processes without negatively impacting the system’s current operation. The system can not be “turned off” while it undergoes renovations. It must evolve while continuing to deliver critical oversight.  

Policy development and policy assurance processes during the transition phase will need to be clearly laid out to provide certainty and predictability to industry, landowners and other stakeholders, First Nations and all Albertans.

Particular transitions that must be considered include:

- The adoption of regional land-use plans that are being developed under the Land-use Framework, and associated regional outcomes that will need to be supported;
- The adoption of a common and systemic Risk Management Framework, and the development and adoption of additional policy tools to manage risks to Alberta’s desired outcomes; and
- The transition from current assurance processes to enhanced processes.

Legislative framework and policy integration
Several aspects of the Enhanced System will require legislative change. Most prominent is the consolidation of policy assurance functions in a new single regulator. Many detailed policy questions will need to be addressed in implementing this shift. The integration of natural resource policies will also involve legislative changes, so that statutes and regulations are clear and consistent.

The highly inter-related nature of policy and legislation means that policy integration and legislative change will need to be undertaken synchronously. A team should be established as soon as possible to begin the process of identifying the legislative framework needed to implement the recommendations. Once established, the SREM Policy Management Office will need to work with the legislative team to ensure appropriate legislative changes are advanced to reflect integration of policies.

Information management systems
Policy development and policy assurance rely heavily on information. The Enhanced System envisions ongoing dialogue between both stages, wherein data and information are “fed back” to facilitate continuous improvement. Since policy assurance functions will be assumed by a single regulator, enhancements to information systems will be required to enable this feedback and dialogue. This will be a significant undertaking, which will require careful planning and adequate resources.

Identify resource needs
The Enhanced System will need to be adequately resourced, both financially and from a human resource perspective. It will be essential for the single regulator to have sufficient technical expertise and capacity, given its significant responsibilities. Detailed work will need to be undertaken on the resource requirements for implementation and ongoing operation of the enhanced system, including an appropriate funding model.

Clearly identify First Nation consultation processes
Alberta is committed to fulfilling its obligations to First Nations consistent with the First Nation Consultation Policy on Land Management and Resource Development and associated guidelines. Proposed changes to the Policy Development and Policy Assurance System will need to be coordinated and aligned with other Government of Alberta initiatives, including the current policy and guidelines review.
Looking Ahead To An Enhanced System

Alberta has an excellent opportunity – and an urgent need – to enhance its current system. It is essential for ensuring Alberta remains a competitive place to invest in upstream oil and gas, so that Albertans can realize the full benefits of the province’s oil and gas resources.

It is also essential for ensuring Alberta's resources are developed responsibly – in ways that minimize environmental impacts, protect public safety and public interests, and conserve Alberta's resource base.

The recommendations made in this report will bring about a Policy Development and Policy Assurance System that is more efficient, effective, adaptable, predictable, fair and transparent.

It will be a system that embraces innovation and encourages industry and government to continuously strive for better performance. It will meet the demands of today’s busier and more complex landscape, and help Alberta achieve its social, economic and environmental goals.

Above all, it will maintain and build the trust and confidence of Albertans, and ensure their input and interests shape Alberta’s development choices.
APPENDIX A:
Listing of Near-Term Enhancements

Part 1 - Near-Term Enhancements Included in June 2010 Report, Enhancing Assurance:
The First 90 Days

1. In-Situ Approvals Streamlining. In December 2010, the ERCB issued Directive 78: Regulatory Application Process for Modifications to Commercial In-Situ Oil Sands Projects. This Directive provides a more effective application process for in-situ oil sands developments that will provide greater certainty to the process and the timelines required.

2. Harmonization of well spacing. ERCB Bulletin 2010-39 has been released for stakeholder feedback. This Bulletin is intended to revise and harmonize well spacing regulations, and standardized target areas. This simplification is expected to eliminate the need for 250-300 applications per year, saving about $3 million annually for proponents to reinvest in the Alberta economy.

3. PDA Streamlining. Through the Guidelines for Submission of a Pre-Disturbance Assessment (PDA) and Conservation and Reclamation Plan (effective January 2010), developers remain legally required to submit PDAs, but in a more streamlined way, which will reduce the current delay in the beginning of project construction.

4. Coordinated Compliance Inspections. As the ERCB, SRD, and Alberta Environment are responsible for various aspects of facility inspections, a cross-training program is being development to better enable Alberta inspectors to identify key risks and compliance issues during facility inspections. The program is expected to be implemented in 2011.

5. Unconventional gas and tight oil data confidentiality. Through its Unconventional Gas Project, the ERCB has initiated discussions with industry regarding appropriate confidentiality provisions for unconventional gas and tight oil data. Enhanced confidence in data confidentiality provisions will build confidence in Alberta as a competitive place to invest.

6. Simplifying of CBM control well requirements. In April 2010, the ERCB approved Directive 062, which clarified and simplified control well requirements, bringing all CBM development under the same testing requirements. This is expected to save approximately $18 million annually for proponents to reinvest in the Alberta economy.

7. Shale Gas Control well requirements. In June 2010, the ERCB issued Bulletin 2010-20, which provides interim shale gas data requirements while the ERCB reviews all aspects of unconventional gas regulation, including the type and quality of shale gas data required. The Bulletin has provided clarity to developers and guidance to investors regarding Alberta’s future approach to unconventional gas regulation.

8. Shale Gas data reports. Since 2009, the ERCB has released 13 reports on shale gas properties of prospective geological formations. Alberta is
one of very few jurisdictions where this kind of data is released into the public domain for use by industry, thus enhancing Alberta’s competitiveness.

9. Interim relief from CBM annual pressure testing. In October 2010, the ERCB issued Bulletin 2010-33, which extends the period of relief to industry for this requirement. An overall review is underway to determine how to address a costly process that may be generating data of low additional value.

10. Horizontal wells in unconventional reservoirs. Please see point 2 above; draft Bulletin 2010-39 also intends to address requirements to simplify subsurface space requirements for horizontal wells in unconventional reservoirs. This could further reduce the number of applications to the ERCB, resulting in additional time and cost savings for reinvestment into the Alberta economy; existing high resource conservation and reservoir equity standards will be maintained.

11. Shutdown of Balzac Gas Plant. This plant is still scheduled for shutdown in 2011 through a coordinated effort of Alberta Environment and the ERCB, and has set a model for future collaborative efforts that will reduce overlaps and duplications of regulatory functions.

12. MOU on First Nations consultation. A November 2010 Memorandum of Understanding between SRD and the ERCB will facilitate information sharing between the two agencies, this improving decision making on applications which could directly and adversely affect First Nations.

13. Consolidation of regulatory publications. Since 2004, the ERCB has reduced the number of regulatory publications from 205 to 164, resulting in less “red tape” for industry and stakeholders to sort through. There are ongoing efforts to further consolidate these publications, including Bulletins 2010-30 and 2010-34.

14. Consolidation of pipeline requirements. In May 2010, the ERCB issued Directive 77, which amalgamated The ERCB in the process of consolidating Directives, Information Letters, interpretive documents, and reference tools relating to pipelines into a single, consistent and clear Pipeline Directive.

15. Rescission of Directive 57. A thorough review of Directive 57 found it to duplicate what was being achieved through another publication. To reduce red tape and because public safety is being maintained at a high level, the ERCB made the decision to rescind Directive 57 in 2010.

16. Harmonization of regulations. Harmonizing some natural gas testing requirements with British Columbia will result in the adoption of best practices and significant industry savings. Work is ongoing on this file.

17. SREM application guidance package. The Upstream Oil and Gas Authorizations and Consultation Requirements Guide has been completed and is currently available for use online.⁶

⁶ Please see: http://authorizationsguide.ercb.ca
18. First Nations Consultation coordination. The SREM departments are currently developing an approach to consolidate the delivery of First Nations consultation activities in single unit. This will provide clarity of roles and transparency of decision-making to First Nations and industry stakeholders.

19. Area Operating Agreements Enhanced Approval Process. In September 2010, SRD unveiled the Enhanced Approval Process for upstream oil and gas operations on public lands. This enhanced approvals process is more streamlined and efficient, providing clear standards and guidelines for industry planning and operations.

Part 2 - Near-Term Enhancements Since June 2010

1. Risk Management Approach to In-Situ Applications. One of the recommendations of the Regulatory Enhancement Task Force is to apply a risk-management approach to the regulation of in-situ oil sands applications. The development and application of a systemic risk management approach will ensure that the right regulatory tools are applied to manage expected levels of risks in these projects.

2. ERCB bulletin 2010-44, Enhancing Role in Technology Development. In December 2010, the ERCB issued this Bulletin, which will see innovative technology reviewed, deployed, and integrated into the ERCB regulations in a timely manner. This will provide an incentive to project proponents to develop and test new technologies to promote innovation and better manage the effects of development on the environment.

3. GIS Platform. The ERCB has developed a GIS platform to allow the public and industry to search information on enhanced recovery approvals.

4. Dispute Resolution Process Improvements. The ERCB has implemented a new process of appropriate dispute resolution between project proponents and stakeholders to enable earlier resolution of disputes related to regulatory approvals.

5. Increased Processing Times for Reservoir Applications. The ERCB has reduced timelines for processing reservoir-related applications by introducing a new screening step, which refers deficient applications to technical staff for resolution.
Appendix B:
Scope Of The Regulatory Enhancement Project

The following areas were examined within the scope of the REP:

- Current Alberta-based regulations for oil and gas activities in Alberta, including oil sands and site-based activity;
- Oil and gas regulatory functions in the Alberta Departments of Energy, Environment, Sustainable Resource Development and the Energy Resources Conservation Board;
- All current natural resource management strategic policies (e.g., policies related to air, land, water, recreational land and rural communities including the Provincial Energy Strategy, Land Use Framework, Water for Life, and others) as they impact upon oil and gas policy development and regulatory delivery.
- Consideration of related Government of Alberta initiatives through the Regulatory Project Advisor Group;
- System design recommendations;
- The subsurface tenure retention process;
- Consideration of federal regulatory alignment issues.

The following areas were specifically outside of the scope of the REP:

- First Nations consultation processes;
- Setting of policy or outcome thresholds, targets, or standards for environmental, economic, social, or other factors;
- Sectors outside of oil and gas beyond the in-scope activities listed above;
- Pipelines beyond the in-scope activities listed above;
- Recommendations for the federal regulatory system;
- Implementation of system design components;
- Forest sector regulations;
- Regulatory functions of the Alberta Utilities Commission and the National Energy Board; and
- The subsurface tenure acquisition process.
APPENDIX C:

Engagement Process

The following is a list of the briefings, workshops sessions and meetings that were held as part of the REP engagement process.

<table>
<thead>
<tr>
<th>Stakeholders Groups &amp; First Nations</th>
<th>Session</th>
<th>Date</th>
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<tbody>
<tr>
<td><strong>Issues and Opportunities</strong></td>
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<tr>
<td>Municipalities and Municipal Associations</td>
<td>Briefing/Workshop</td>
<td>May 19</td>
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<tr>
<td>Environmental Non-Governmental Organizations (ENGOs)</td>
<td>Briefing/Workshop</td>
<td>May 19</td>
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<tr>
<td>Landowners and Landowner Associations</td>
<td>Briefing/Workshop</td>
<td>May 21</td>
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<tr>
<td>Government of Alberta Ministries and Agencies</td>
<td>Briefing</td>
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<td>Landowners and Landowner Associations</td>
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<td>June 24</td>
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<td>First Nations</td>
<td>Briefing/Workshop</td>
<td>August 12</td>
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<tr>
<td>Oil &amp; Gas Industry</td>
<td>Briefing/Meeting</td>
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<td><strong>System Enhancement Options</strong></td>
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<td>Government of Alberta Ministries and Agencies</td>
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<tr>
<td>Landowners and Landowner Associations /ENGOs/</td>
<td>Workshop</td>
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<td>First Nations</td>
<td>Workshop</td>
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<td>ENGOs</td>
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<tr>
<td><strong>Preferred System Enhancements</strong></td>
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<td>Landowners and Landowner Associations /ENGOs/ Municipalities and Municipal Associations/First Nations/ Oil &amp; Gas Industry/Government of Alberta Ministries and Agencies</td>
<td>Forum</td>
<td>October 1</td>
</tr>
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</table>
Individuals from the following organizations were invited to participate in the REP engagement process:

**Environmental and Non-Governmental Organizations**
- Agriculture and Food Council of Alberta
- Agri-Environmental Partnership of Alberta (AEPA)
- Alberta Airsheds Council (AAC)
- Alberta Conservation Association (ACA)
- Alberta Fish and Game Association
- Alberta WaterSMART
- Alberta Wilderness Association
- Alberta’s Industrial Heartland Association (AIHA)
- Canada West Foundation
- Canadian Parks and Wilderness Society (CPAWS) - Northern Alberta Chapter
- Clean Air Strategic Alliance
- Clean Air Strategic Alliance (CASA)
- Ducks Unlimited Canada - Alberta
- Environmental Law Society
- Hunting for Tomorrow
- Integrated Landscape Management (University of Alberta)
- Miistikas Institute
- Nature Conservancy Canada - Alberta and The North
- The Land Stewardship Resource Centre of Canada
- The Pembina Institute
- Toxics Watch Society of Alberta
- Trout Unlimited Canada (TUC)
- Water Matters Society of Alberta
- Water Planning and Advisory Councils (WPAC)

**Government of Alberta**
- Alberta Aboriginal Relations
- Alberta Agriculture and Rural Development
- Alberta Aboriginal Relations
- Alberta Advanced Education and Technology
- Alberta Agriculture and Rural Development
- Alberta Culture and Community Spirit
- Alberta Energy
- Alberta Environment
- Alberta Finance and Enterprise
- Alberta Health and Wellness
- Alberta International and Intergovernmental Relations
- Alberta Justice and Attorney General
- Alberta Municipal Affairs
- Alberta Sustainable Resource Development
- Alberta Tourism, Parks and Recreation
- Alberta Transportation
- Energy Resources Conservation Board
- Executive Council
- Treasury Board

**First Nations**
All 47 First Nations and the three Treaty Organizations in Alberta were invited to participate in the REP engagement process.

**Industry**
The upstream oil and gas industry was represented by the Canadian Association of Petroleum Producers. The following organizations were part of this group:
- Alberta Chamber of Resources
- Canadian Energy Pipeline Association
- Canadian Association of Geophysical Contractors
• Canadian Association of Oilwell Drilling Contractors
• Canadian Society for Unconventional Gas
• In Situ Oil Sands Alliance
• Oil Sands Developers Group (OSDG)
• Petroleum Services Association of Canada
• Small Explorers and Producers Association of Canada

Landowners
In addition to the organizations listed below, some individual landowners were invited to participate in the REP engagement process.

• Agri-Environmental Partnership of Alberta (AEPA)
• Alberta Irrigation Projects Association
• Alberta Land Trust Alliance (ALTA)
• Alberta Parks
• Alberta Surface Rights Group
• Davey Lake Surface Rights Association
• Eastern Irrigation District
• Freehold Owners Association (FHOA)
• Land Advisors Association
• My Landman Group Inc
• Pine Lake Surface Rights Association
• Southern Alberta Land Trust Society (SALTS)
• Springdale Surface Rights Association
• Synergy Alberta
• Urban Development Institute Alberta (UDI)

Municipalities
• Alberta Association of Municipal Districts and Counties (AAMDC)
• Alberta Urban Municipalities Association (AUMA)
• Brazeau County
• City of Brooks
• City of Calgary
• City of Cold Lake
• City of Edmonton
• City of Grande Prairie
• City of Leduc
• City of Lethbridge
• City of Medicine Hat
• City of Red Deer
• Clearwater County
• County of Vermilion River
• County of Grande Prairie no. 1
• Kneehill County
• Lacombe County
• Municipal District of Bonnyville no. 87
• Municipal District of Peace no. 135
• Municipal District of Pincher Creek no. 9
• Northern Sunrise County
• Parkland County
• Regional Municipality of Wood Buffalo
• Special Areas Board
• Strathcona County
• Sturgeon County
• Town of Beiseker
• Town of Blackfalds
• Town of Canmore
• Town of Drayton Valley
• Town of Drumheller
• Town of Fort MacLeod
• Town of Hinton
• Town of Peace River
• Town of Slave Lake
• Town of Whitecourt
• Village of Clive
• Wheatland County
• Yellowhead County