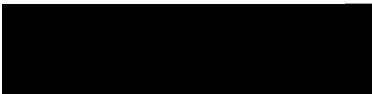




March 31, 2025



Regulatory Policy, System Operations  
Canada Energy Regulator  
210-517 10 Ave SW  
Calgary, AB, T2R 0A8



**Re: CER Phase 2 review of the Onshore Pipeline Regulations and the Environmental and Socio-Economic Assessment and Lands portion of the Filing Manuals (FM)**

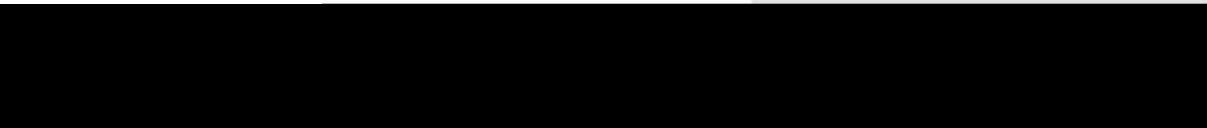
Dear [REDACTED]:

The Canadian Association of Petroleum Producers (CAPP) appreciates the Canadian Energy Regulator's (CER) continued efforts to review and reform the *Onshore Pipeline Regulations* (OPR). Pipelines are a critical component of Canada's energy infrastructure and streamlining regulations will be vital if Canada is to diversify its energy exports and grow the oil and natural gas sector to deliver jobs and attract investment.

CAPP and our member companies see a critical need to tariff-proof our economy by growing and diversifying market access for Canadian oil and gas. Now, more than ever, we must accelerate project approvals, expand pipeline infrastructure, and attract investment. Streamlining the OPR will be a critical component in delivering those commitments.

Reforming major project legislation and all associated regulations, including those under the purview of the CER, is a priority for the upstream oil and gas industry. Canada's existing approvals and regulatory system for major projects, including pipelines, is blocked by growth-inhibiting legislation and jurisdictional overreach. Canada requires a predictable approach with ambitious timelines and provinces should be relied upon as lead regulators wherever feasible.

Canada has opportunities to build a more resilient and prosperous economy. Major projects to secure our energy future are waiting to be built. To act on these opportunities, we need a significant reset across Canada in terms of fiscal, infrastructure, energy and environmental policy to



support regulatory efficiency. We look forward to working with federal regulators to efficiently implement those plans.

CAPP has prepared a response to the questions posed in the OPR discussion papers, but is deferring its response until after the federal election. We believe this engagement should resume under a refreshed mandate that targets increasing efficiency and streamlining processes under the CER and the Impact Assessment Agency. This effort should accelerate judicially resilient approvals and reduce red-tape by respecting the role of the provinces and preventing duplication.

We look forward to working with the CER to deliver on Canada's growth opportunity. For additional insights into that opportunity and what will be required to unlock it, please see Building Canada's Future.<sup>1</sup> Please contact me directly if you have any questions.

Sincerely,

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<sup>1</sup> <https://www.capp.ca/wp-content/uploads/2025/03/Building-canadas-future.pdf>