



2025-05-15

To: Canada Energy Regulator

Subject: SCC Submission: Environmental Protection Topic Paper, OPR Review

Dear Canada Energy Regulator,

On behalf of the Standards Council of Canada (SCC), we wish to express our appreciation for the opportunity to provide comments as part of the Canada Energy Regulator's (CER) Phase 2 review of the Onshore Pipeline Regulations (OPR) and the Environmental and Socio-Economic Assessment and Lands portions of the Filing Manuals.

Support for regulatory alignment through standards

The SCC welcomes the CER's commitment to strengthening environmental protection through modernized regulations. We support the CER's consideration of incorporating the use of standards, including environmental management standards, into the OPR and related technical guidance.

Consensus standards, which encompass National Standards of Canada developed by SCC-accredited standards development organizations, as well as international standards developed by bodies like the International Organization for Standardization (ISO), are an essential tool to help governments reach their policy objectives. This is because they are developed and maintained by the users, including technical experts and regulators working together. The development process follows the World Trade Organization principles for standards development, which include transparency, openness, impartiality and consensus, effectiveness, and coherence. In parallel, third-party conformity assessment under SCC accreditation supports fair, consistent, and internationally harmonized regulations and enforcement.

This is why standards and conformity assessment are widely used in Canadian regulation, codes, and industry guidance, as both mandatory and recommended compliance pathways. The TBS Cabinet Directive on Regulation, supported by Section 18 of the Statutory Instruments Act, states that "[d]epartments and agencies should take into account potential opportunities for incorporation by reference of internationally accepted standards and/or regulations" (Section 5.2.6).

Leveraging standardization under the *Environmental and Socio-Economic Assessment and Lands* section of the Filing Manuals

As Canada's representative to ISO, the SCC promotes the adoption of internationally recognized standards that support regulatory efficiency, innovation, and public trust. The Secretariat of the ISO Environmental Management Technical Committee, which is responsible for producing environmental management standards, is held by Canada through the SCC. We encourage regulators to refer to these standards, where appropriate, to support regulatory objectives.

In addition to our standardization mandate, we accredit conformity assessment bodies, including those that certify organizations to ISO 14001, the international standard for environmental management systems (EMS). Our accreditation process ensures that certification bodies operate

with competence, impartiality, and consistency. Through this work, SCC supports credible EMS certifications across Canada's industrial sectors, thereby reinforcing environmental integrity and enhancing regulatory confidence. This role enables regulated entities to demonstrate robust environmental performance in a manner that aligns with CER's oversight objectives.

The CER's exploration of international standards is timely and aligns with global trends in sustainable infrastructure regulation. As the CER is no doubt aware, [ISO 14064-3 Greenhouse gases – Part 3: Specification with guidance for the verification and validation of greenhouse gas statements](#) and [ISO 14065 General principles and requirements for bodies validating and verifying environmental information](#) are referenced not only in the federal Output-Based Pricing System Regulations made pursuant to the *Greenhouse Gas Pollution Pricing Act* and the *Environmental Violations Administrative Monetary Penalties Act*, but also in provincial greenhouse gas regulations in provinces across Canada including British Columbia, Alberta, Ontario, Quebec, and New Brunswick. In referencing these ISO standards, regulators across Canada have recognized the value of ISO standards in ensuring that environmental reporting is robust and trustworthy.

The ISO 14090 series of standards on Adaptation to Climate Change are also useful tools for ensuring climate resiliency. [ISO 14090 Adaptation to climate change – Principles, requirements and guidelines](#) provides guidance to organizations on how to understand climate change impacts and how to integrate adaptation planning within or across organizations. [ISO 14091 Adaptation to climate change – Guidelines on vulnerability, impacts and risk assessment](#) provides guidelines for assessing risks related to the potential impacts of climate change.



We are pleased to see that the CER Filing Manual already makes reference to [ISO 14064-1](#) and [ISO 14064](#) as reference documents for the GHG assessment. [ISO 14060 Net Zero Aligned Organizations](#), which converts the [ISO Net Zero Guidelines](#) into an international standard, is currently under development and we will be pleased to keep you apprised of its development.

The Standards Council of Canada: Enabling Canadian priorities through standardization

The Standards Council of Canada is a federal Crown corporation that reports to Parliament through the Minister of Innovation, Science and Industry. Our mandate is to promote efficient, effective, voluntary standardization in Canada. We facilitate Canadian expertise at international standards tables, accredit Canadian Standard Development Organizations, and oversee national accreditation functions of conformity assessment bodies, which provide assurance.

We work extensively with our Government of Canada partners to connect standardization to policy priorities. We also help connect related government policy areas to ensure alignment, and to direct national standardization efforts to create innovative standards, conformity assessment schemes, and accreditation programs that reflect Canada's values and priorities. We encourage continued engagement between the CER and the SCC to explore how standards, can help operationalize the CER's regulatory objectives in a practical, internationally aligned, and future-ready manner. The SCC stands ready to support the CER in identifying, referencing, or adapting standards to ensure environmental protection and public confidence across the lifecycle of energy infrastructure.

Thank you again for the opportunity to contribute. On behalf of the Standards Council of Canada,



Standards Council of Canada