



# **Métis Nation – Saskatchewan Track B Onshore Pipeline and Filing Manuals Update Engagement Survey**

**March 2025**

**Ministry of Lands and Environment**



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### 1. Executive Summary

Métis Nation–Saskatchewan (MN–S) Lands and Environment received funding in 2024 from the Canadian Energy Regulator (CER) to engage Métis Citizens on the Onshore Pipeline Regulations (OPR) and Filing Manuals update and provide feedback on behalf of Métis citizens. The CER launched a multi-year review process to review the OPR and update the Environmental and Socio-economic Assessment (ESA) and Lands sections of the Filing Manuals. The OPR are the main regulations used to oversee pipelines in Canada. The Filing Manuals (FM) explain what is included in the application of proposed projects. The review is being guided by the CER’s commitment to implement the United Nations Declaration of the Rights of Indigenous Peoples Act and through The UN Declaration Act, Action Plan Measure 34 (APM 34). APM 34 is to work in consultation and cooperation with First Nation, Métis, and Inuit communities, governments, and organizations to amend the CER OPR and FM of CER regulated infrastructure.

Engagement and feedback for the updates to OPR and FM will be conducted in three phases. Phase 1 occurred in 2023 and received 97 submissions in response to the Onshore Pipeline Regulations Review – Discussion Paper. MN – S Lands and Environment did not participate in Phase 1 due to capacity restraints. Phase 2, the current phase, began in June 2024 and will conclude on March 31, 2025. Phase 3 will occur between 2025 and 2026 with focus on review of the regulatory proposal and updated sections of the ESA and Lands section of the Filing Manuals. Once completed, an updated OPR will be drafted.



## 2. MN-S Overview

The Métis Nation–Saskatchewan (MN-S) is a government, with a clear constitution, representing over 80,000 Métis citizens in Saskatchewan. The goal of MN–S is to pursue the advancement of the socio-economic and cultural well-being of the people of Saskatchewan. Under the leadership of President Glen McCallum, The MN–S is “building a strong, healthy Nation that is transparent and accountable.”

The fundamental principles which guide the governance of Métis Nation- Saskatchewan are based on the Constitution of the Métis Nation–Saskatchewan, the Métis Nation of Saskatchewan Citizenship Act, Saskatchewan Métis Elections Act 2007, Métis Nation of Saskatchewan Legislative Assembly Act, and other related Métis legislation. Métis Nation and CER has confirmed strategic partnerships to advance reconciliation with the Métis Nation–Saskatchewan.

One of the fundamental responsibilities for MN-S is the engagement of Métis citizens in planning, implementation and evaluation of MN-S projects, programs, and services. The updates to the OPR and FM will have lasting impacts to Métis citizens and any updates should be carefully considered by the CER. Meaningful and adequate engagement is required for past Phase 2 of the updates. The MN-S continues to build capacity with its citizens and communities, so they have informed positions on the Onshore Pipeline Regulations and Filing Manuals and associated resource development projects.

## 3. Role of Organizations Participating in the Engagement Survey

### **Natural Resources Canada**

Natural Resources Canada (NRCan) promotes the sustainable development and responsible use of Canada’s natural resources. As part of its commitment to ongoing, meaningful engagement on Onshore Pipeline Regulations and Filing Manuals, NRCan launched an ongoing Indigenous engagement process in 2024 to engage Indigenous groups and organizations on the OPR and Filing Manuals across Canada.

### **Canadian Energy Regulator**

The Canadian Energy Regulator (CER) a regulatory agency within NRCan. The CER

regulates pipelines, powerlines, energy development and trade that crosses provincial and international borders. They do not regulate energy products within provinces or territories. The CER oversees the entire lifecycle of energy development including proposed energy projects, construction, operation, and end of life.

#### 4. MN – S Engagement Survey Methods

The MN-S Ministry of Lands and Environment, Communications team and engagement team developed an engagement survey which was launched on March 13, 2025. The survey was open for 10 days. Métis citizens from MN – S Western Region 2A, Western Region 3, Eastern Region 2A, and Eastern Region 3 were engaged. The engagement survey was developed as a tool to share information with MN-S citizens to have meaningful conversations on the CER OPR and FM Update, specifically the Topic Paper I. OPR – Rights and Interests of Indigenous Peoples, Socio-economic effects and Engagement and M - Filing Manuals – Rights and Interests of Indigenous Peoples. Prior to completing the survey, citizens were provided with relevant information on the CER, OPR and Filings Manuals, and the topic papers being discussed. In addition, citizens were engaged on the role of the Indigenous Advisory and Monitoring Committee (IAMC).

#### 5. Results

MN – S collected responses from 339 participants for review and analysis across Western Region 2A, Western Region 3, Eastern Region 2A, and Eastern Region 3. Analysis of the engagement survey and MN-S feedback identified four major themes of interest and concern to the MN-S regarding the CER OPR and Filing Manuals Update: meaning full engagement and involvement, economic development, environment, and policy. More detailed aspects of these themes are provided in Table 1. Detailed responses of the survey can be found in Figure 1 through 4. An important outcome of these sessions is that they have provided the opportunity for the MN-S to engage and obtain feedback from its citizens on energy-related regulations federally.

**Table 1. Key Themes**

Long-Term Engagement	
<ul style="list-style-type: none"> <li>• Accountability</li> </ul>	<ul style="list-style-type: none"> <li>• Decision making</li> </ul>
<ul style="list-style-type: none"> <li>• Information clarity</li> </ul>	<ul style="list-style-type: none"> <li>• Mandates</li> </ul>
<ul style="list-style-type: none"> <li>• Métis contribution</li> </ul>	<ul style="list-style-type: none"> <li>• Preparation</li> </ul>

• Transparency	• Transparency
<b>Economic Development</b>	
• Employment, contracts, skills, and training	
<b>Environment</b>	
• Traditional Knowledge and Land Use	• Monitoring
• Emergency response	• Regulatory process
• Sustainability	• Water quality and quantity
<b>Policy and Regulations</b>	
• Guidance and best practices	• Increased proponent requirements
• Indigenous Law	• Cultural competency

Table 2 displays the survey questions that were asked.

<b>Table 2. MN - S Engagement Survey Questions</b>	
1. Are you aware of what the Canadian Energy Regulator does?	11. Would you like to see a guidance and best practices document that is developed alongside Métis citizens?
2. Do you think that the CER can improve their regulations on the interests and rights of Indigenous Peoples, specifically Métis citizens?	12. Would you like to see companies regulated by the CER identify, incorporate and address applicable Indigenous laws, policies, practices, and protocols into their management systems, including protection programs to prevent and address impacts to the rights and interests of Métis citizens?
3. Do you want to see economic opportunities for Métis Citizens?	13. Would you like to see companies required to implement a management system that implements a process to engage with Indigenous Peoples?
4. Would you like a requirement of including Traditional Métis Knowledge when designing environmental protection plans and reclamation?	14. Would you like to have systems in place to ensure those working on behalf of the company are doing so in a culturally safe manner?

5. Would you like the inclusion of Métis people in emergency response exercises to be a requirement of the OPR?	15. Do you think cultural competency training should be required for everyone working for regulated companies?
6. Do you think there should be capacity support for Métis People to review condition filings for proposed projects?	17. Do you think that an engagement process should be required in the management system of CER regulated companies?
7. Do you think that the CER needs to improve the monitoring of positive and/or adverse socio-economic effects during the life-cycle of a pipeline?	18. Would you like to see the ESA section of the Filing Manuals be split in two to improve clarity? The ESA would be split into the ESA section and a new Rights and Interests of Indigenous Peoples section?
8. Do you think that reporting on economic opportunities for local and regional Métis people and communities should be incorporated into CER proposed projects?	19. Would you like to see a Valued Components (human or natural elements that are important to participants in an impact assessment) category that is focused on the rights and interests of Indigenous Peoples? This category would be a separate category from the Biophysical and socio-economic category..
9. Do you find the regulatory process to be inconsistent and lacks involvement with Métis people during the project development?	20. Have you heard of the IAMC?
10. Do you think that implementing these changes will support the United Nations Declaration on the Rights of Indigenous Peoples Act specifically Action Plan Measure 34?	21. Do you know what the IAMC does?
11. Do you wish the CER would incorporate Indigenous Knowledge into their regulations?	22. Do you have any knowledge of the Enbridge Line 3 Replacement Project?
12. Would you like to see a guidance and best practices document that is developed alongside Métis citizens?	

Figures 1 through 4 below summarizes the survey results obtained from Métis citizens. Due to the length of some questions, the questions have been cut shorter. Please see above for full questions.

Figure 1. Engagement survey results (1/4)

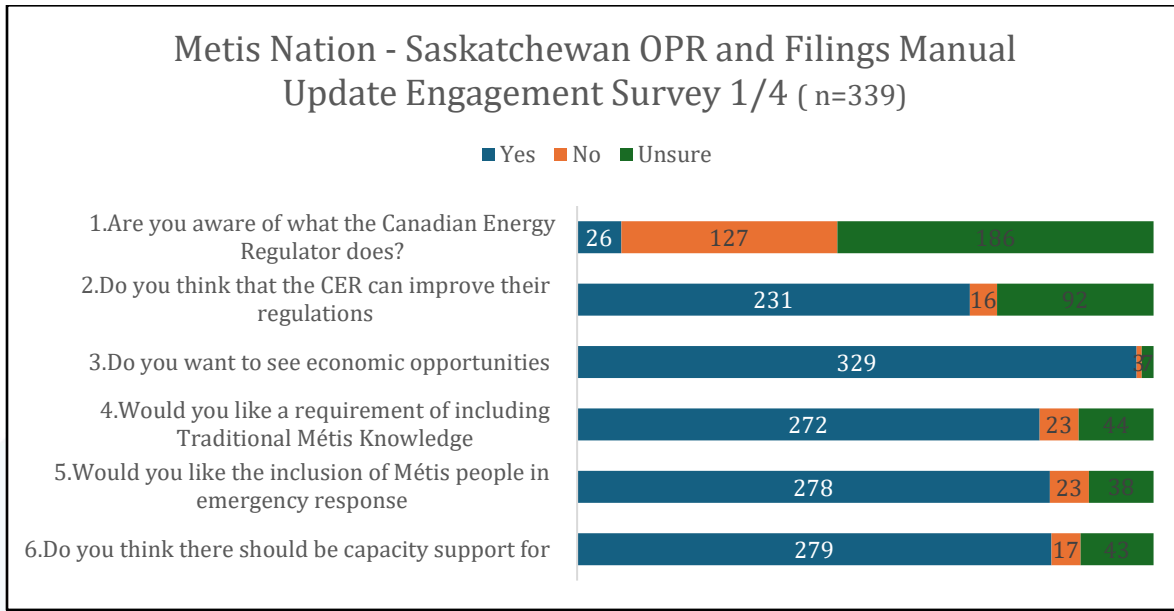


Figure 2. Engagement survey results (2/4)

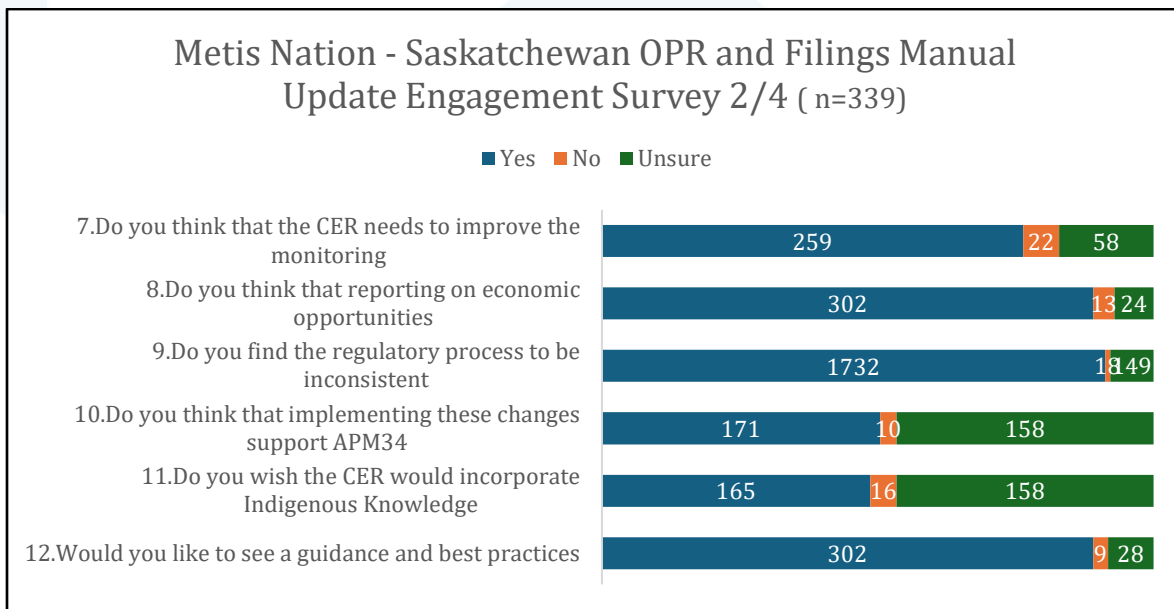


Figure 3. Engagement survey results (3/4)

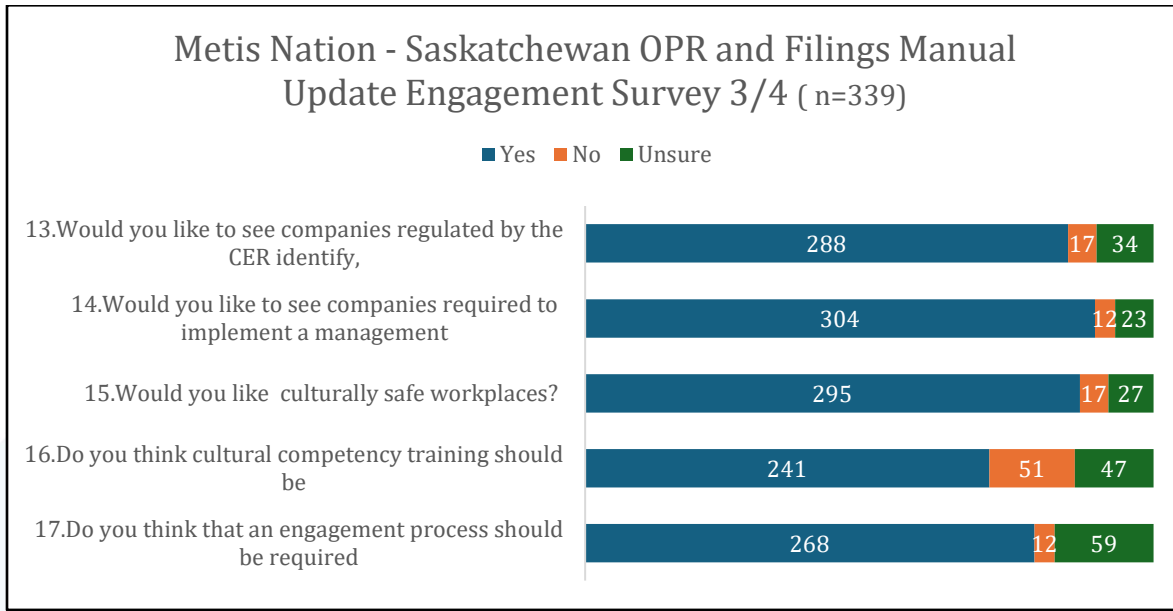
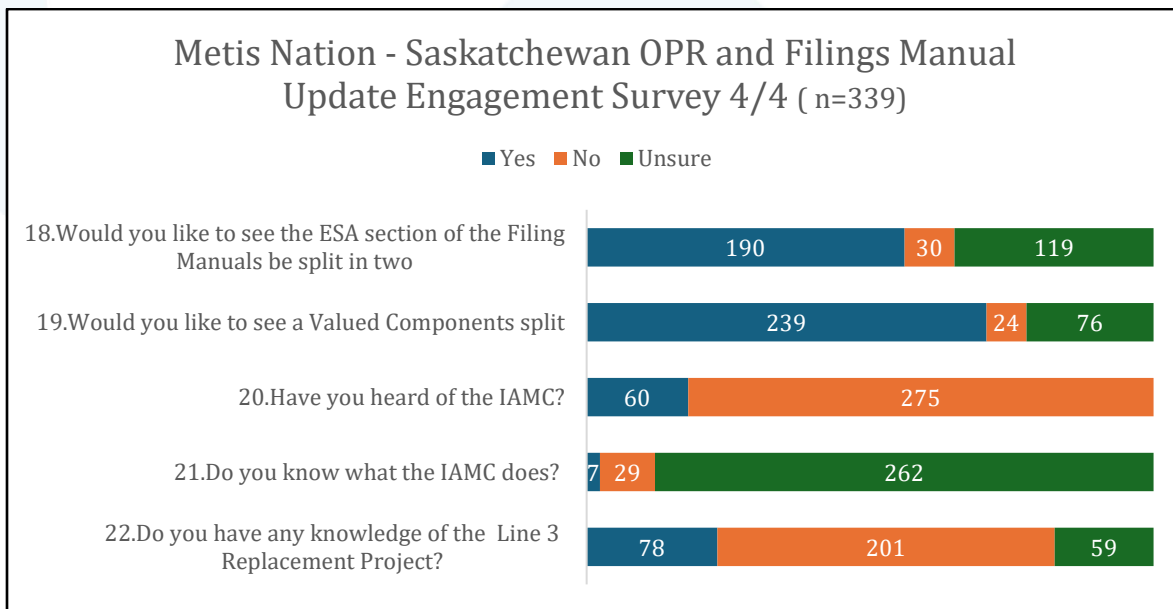



Figure 4. Engagement survey results (4/4)





Citizens were also asked “What would be the best way to ensure that regulated companies are in compliance with the regulations?” and “Is there anything other feedback or suggestions you would like to make on the CER’s Onshore Pipeline Regulations or Filing Manuals” to be given the opportunity to provide individual feedback.

Feedback heard from participants included developing strong policies that involve cultural practices and requirements that provide an enforcement framework for non-compliance. Participants suggest regular auditing by a third party auditor, increased reporting, and action plans and items addresses in a timely manner. In addition, many participants recommended having economic opportunities for Métis people including career opportunities. These career opportunities included but are not limited to management positions, Métis monitors, community liaisons, and compliance officers. Outside of capacity roles, many participants want the opportunity for increased communications and opportunities for discussions of on going projects. Increased transparency was a common theme from the feedback.

Primarily participants highlighted the need for meaningful engagement and inclusive consultation with the Nation and other Indigenous groups. Many opinions included lack of opportunity for involvement of Métis and Indigenous groups. There was emphasis on a collaborative approach that enables projects to respect cultural practices and environment while still allowing for a project to be completed.

It is also important to acknowledge that there are many different opinions/perspectives amongst our Métis citizens. It is not the MN- S thinking to assert a certain perspective as the "right" one but rather to work towards understanding different perspectives. Taking the time to collect and analyze the quantitative and qualitative data that comes from MN- S citizen engagements will ensure that it is meaningful and effective for Métis citizens.

## 6. Feedback and Recommendations

Métis Nation – Saskatchewan makes the following feedback and recommendations:

- Split the Environmental and Socio-assessment section of the Filing Manuals into two sections with a separate section for the Rights and Interests of Indigenous Peoples
- Have a category of Valued Components that is focused on the Rights and Interests of Indigenous People and separate from the Biophysical and socio-economic category
- Seek and implement the unique Métis traditional knowledge into the updated



#### OPR and Filing Manuals

- Develop guidance and best practice documents that incorporates Traditional Métis Knowledge
- The requirement of Métis People in emergency response exercises
- Improve monitoring of positive and/or adverse socio-economic impacts to Métis people during the lifecycle of a pipeline
- Develop systems that ensure those working for or on behalf of regulated proponents are doing so in a culturally safe manner
- Provide economic opportunities for Métis Citizens
- Proceed with engagement broadly across MN-S regions, as well as with focused participants such as resource managers, and with the Métis Nation – Saskatchewan Government
- Review the updated Onshore Pipeline Regulations and Filing Manuals Prior to document finalization.

## 7. Limitations and Acknowledgements

While the decision was made to proceed with a survey engagement opposed to a townhall styled engagement this may have resulted in limitations in response and access to the survey. The survey targeted towards specific Métis regions presents access barriers to full engagement.

The Métis Nation-Saskatchewan thanks its citizens and leadership for their participation and input into this engagement survey. We thank Natural Resources Canada, and the Canadian Energy Regulator for their participation and shared knowledge on this important initiative.

## 8. Glossary

<b>Term</b>	<b>Definition</b>
<b>Action Plan Measure 34 (APM34)</b>	The APM calls for working in consultation and cooperation with Firstion, Métis, and Inuit communities governments and organizations to (i) enhance the participation of Indigenous Peoples in and (ii) set the measures that could enable them to exercise federal regulatory authority in respect of, projects and matters that are currently regulated by the CER.
<b>Canadian Energy Regulator (CER)</b>	Regulates energy infrastructure to prevent harm and ensures safe, reliable, and environmentally sustainable delivery of energy to Canada and the world. They regulate pipelines, powerlines, and energy development on projects that cross provincial and federal borders.
<b>Environmental and Socio-economic Assessment (ESA)</b>	Process to identify, predict, and evaluate potential environmental effects of a proposed project which occurs prior to decisions about a project are made.
<b>Filing Manuals (FM)</b>	Guidance documents to assist project applicants and interested parties understand what is required in an application to the CER.
<b>Indigenous Advisory and Monitoring Committee (IAMC)</b>	Committee that works with federal regulators and the proponent (Enbridge) to oversee safety and environmental justice throughout the project (Line 3 Replacement) lifecycle.
<b>Natural Resources Canada (NRCan)</b>	Develops policies and programs that enhance contrivution of natural resources to the economy, conducts research, and works in the energy, forestry, mining, and science industries.



**Onshore Pipeline Regulations (OPR)**

**Topic Paper**

**Valued components (VC)**

The main regulations used by the CER to oversee pipeline projects in Canada. All companies must design, build, and operated a federally regulated pipeline

There are 13 topic papers that are part of the OPR and FM. The topic papers includes background of current regulatory requirements, identifies potential objectives, and how to meet those objectives.

Human or natural elements that are important to participants in an impact assessment

