

Response to OPR Discussion Questions

Apeiron was able to meet with citizens of Region 3 and held conversations over the last few months. While the discussion was focused on the questions asked by the OPR discussion paper, some other questions were seen by citizens as above their knowledge or ability to answer. To date, Apeiron has worked with these communities through TLU studies, workshops, and regulatory support. Throughout these processes common themes have emerged and are captured below. Even though each impacted community is in a different geographically, they share many common concerns as Métis people of Alberta.

Answers from communities:

1. Very little is written on the abandonment procedures. So much goes into specifications for building but only a couple of lines are on abandonment. Intention for involvement is good, but to have it in writing that involvement is mandatory would be beneficial.
The CER expects regulated companies to work differently to support Reconciliation with Indigenous peoples. What does differently mean? What is the full expectation?
2. Ensure there are indigenous monitors involved in the process from start to finish. Add remediation regulations that specify the requirements to put the land back to its original state or better. If that is not possible then alternate land should be used for the benefit of community use.
3. Often with heritage resources they are in a designated area, occasionally a little off of the designated areas there maybe additional HRs but cannot unearth anything because it is outside the area. Perhaps there could be considerations to expand the HR area should some artifacts be discovered or the community feels the area needs to be expanded.

Have legislation in place protecting our heritage sites. Have a place where landowner and nations can discuss on how they see it being protected etc., looking at this through conversation and working together.

Make Indigenous Monitoring mandatory. Provide education and training.

4. During remediation include the addition of non-invasive plants that contribute to an increased biodiversity in the area. The addition of medicinal plants and other harvested plants would be a benefit to the indigenous communities, especially the Metis harvesters. Let the indigenous communities (not just the Indigenous Monitor) know of the remediation plans set in place, offer ways to receive feedback before, during, and after the project.

Using the term “taking into account”, this language makes it seem like they are checking a box and showing that they are considering options but not being decisive or taking a proactive position on implementing mandatory processes.

Ensure meaningful inclusion of indigenous knowledge throughout the project site, make sure this is understood and recognized by those on site. Get members of the relevant indigenous groups for each project. Its not a one size fits all scenario.

5. Explicitly include them in the regulations. If companies must include indigenous participation throughout the process, it will increase the draw and awareness for indigenous communities to be involved. Indigenous participation should be less about checking a box and more about building capacity for communities to have a voice in how our land is respected and managed.
6. Send out info packets to the surrounding areas. This could include a QR code that can send them to a website. The website could be used as a public forum, a place to propose changes, build community involvement, post jobs for the project, voice concerns, and gain information on the general project. Alternatively, you could post a (QR code) billboard in the area for the same purpose

Only invite indigenous participants to workshops with the CER, not lawyers or proponents. Create a space where indigenous communities feel free to speak.

7. No comment.
8. Maybe report to the impacted areas so the public knows they can access the information.
9. The Canada Energy Regulator reporting guidelines are extensive, I imagine valuable time is wasted sifting through the guidelines. Having contact information for a representative, or a FAQ section, might speed up the process. Perhaps important deadlines etc.
10. There needs to be representation of all sides present. There needs to be a variety of different experiences as well represented to get a good balance. Supports that are safe and confidential needs to be made readily available and accessible. Have a place where problems and issues can be addressed without animosity or fear of retaliation/abuse. Make all management take training on GBA.

Make sure staff is qualified and passes screening for past work history in camps - ex if someone has a history of work violence or harassment, that that information be a factor in future hiring. But for that to be in place, you need supports and policies to help mitigate that who mentality shift of inclusion and acceptance

11. Again, coming into community often, talking about the opportunities for people to be involved and how to find work as well.

12-28: Not comment.

29. Virtual or in person conferences could be held to engage the industry stakeholders. A survey after a project is completed could also be useful in seeing what worked well and what could have hindered the project. Sharing this with communities. What lessons learned have been incorporated in the practise.