



Energy, Mines and Resources  
Box 2703, Whitehorse, Yukon Y1A 2C6

September 13, 2017

Ms. Christine St-Laurent  
Petroleum Geologist, Natural Resources and Environment Branch  
Indigenous and Northern Affairs Canada  
25 Eddy Street, 10<sup>th</sup> Floor  
Gatineau, Quebec K1A 0H4

Dear Ms. St-Laurent:

**Re: Frontier and Offshore Regulatory Renewal Initiative (FORRI) – Phase III Review**

Thank you for the opportunity to participate in the July 25, 2017 multi-stakeholder consultation session via teleconference on Phase III of the FORRI – Framework Regulations and the opportunity to provide comments on the June 28, 2017 discussion paper associated with this phase.

Yukon has reviewed the discussion paper, and similar to our comments on Phase I, the paper does not really describe the “policy intentions” for Phase III and it is essentially a draft regulation. More analysis and rationale should be provided in the policy document to explain why these changes are being proposed. FORRI should address the policy intent at a “first principle” level discussing the pros and cons of moving from a prescriptive regulation to a performance – based one. A better understanding is needed on the underlying goals.

If FORRI is choosing to forego the policy intention discussion and is moving directly to drafting the Framework Regulations, it is Yukon’s intent to provide its views on the draft regulations in 2018.

If you have any questions on this submission please contact me at (867) 393-7044 or by email at [perry.diamond@gov.yk.ca](mailto:perry.diamond@gov.yk.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read "Perry Diamond". The signature is stylized and somewhat illegible.

Perry Diamond  
Senior Oil and Gas Advisor