



Offshore Petroleum Management Division (OPMD)
Natural Resources Canada
580 Booth Street, 17-A2-1
Ottawa, Ontario K1A 0E4

July 10, 2018

Re: Response to Revised Policy Intention for the Frontier and Offshore Regulatory Renewal Initiative (FORRI)

The Nunatsiavut Government appreciates the opportunity to comment on the Revised Policy Intention for the Frontier and Offshore Regulatory Renewal Initiative (FORRI). Our comments focus on the Nunatsiavut Government's Marine Planning Initiative "Imappivut" and how the FORRI should fit into the larger initiatives in the Labrador offshore. There are two general comments:

1. The Nunatsiavut Government is concerned that the process of FORRI's development may not be the appropriate process for the creation of new regulations. The Guide to the Regulatory Development Process as posted on the NRCAN FORRI website shows the steps to regulatory development, however it is not clear how these steps coincide with the policy intent document which already seems to outline the draft regulations.

Please provide the policy intent that informs the drafting of the regulations, as well as any other documentation as directed by the regulatory development process, such as the triage statement and the regulatory impact analysis statement. The Nunatsiavut government recommends developing principles that form the policy intent of consolidating and modernizing the frontier and offshore oil and gas regulations. For example, "Canada's offshore regulations should incorporate or allow for its incorporation into existing and developing initiatives under aboriginal land claim agreements."

2. The Imappivut Marine Plan is in development to achieve a marine management plan for the Zone area defined in the Labrador Inuit Land Claims Agreement. The Imappivut Marine Plan contains a vision on how Labrador Inuit want to see our waters managed, developed and conserved. The marine plan will address local concerns over resource development and species management, the monitoring of monitor ship traffic, water quality monitoring, and the conservation of historic sites. The marine plan could also define Marine Protected Areas, and areas for the promotion of tourism opportunities.

Please clarify how the policy intent document outlines how the changes to the regulations will ensure the responsible management of resources under the Labrador Inuit Land Claims Agreement.

Thank you for the opportunity to comment.

Sincerely,



Claude Sheppard
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