



CANADIAN ASSOCIATION  
OF PETROLEUM PRODUCERS

June 4, 2012

(via email: [heidi.wiebe@shaw.ca](mailto:heidi.wiebe@shaw.ca) )

Ms. Heidi Wiebe  
Plan Development Lead  
Sahtu Land Use Planning Board  
#16, 515 - 18<sup>th</sup> Avenue SW  
Calgary, AB T2S 0C6

Dear Ms. Wiebe:

**Re: Sahtu Land Use Planning**

I would like to thank you for inviting the Canadian Association of Petroleum Producers (CAPP) to participate, as an observer, in the latest Sahtu Land Use Planning Workshop (SLUPB Technical Workshop #3). The issue of land use planning in the Sahtu, and the desired outcome of greater certainty around the availability and usage of the lands is obviously a very important issue for our members.

CAPP considers land use planning to be an effective tool for identifying and categorizing areas of land and appropriate land uses. The Sahtu Land Use Plan (DRAFT 3), does this by identifying Conservations Zones, General Use Zones, and Special Management Zones. At this, highest level, CAPP supports such planning as it provides certainty that is required to allow for planning of future potential exploration and production of petroleum resources.

Beyond this however, CAPP has serious concerns with the process as put forward in the Plan and reviewed at the latest Workshop. The proposed Land Use Plan goes far beyond identifying land use zones and associated land use prohibitions or conditions that if met would allow for responsible development and utilization of resources. Conformity requirements (CR) 2 through 20, put forward in the Plan, deal with matters that are already covered by existing policy and regulatory frameworks. The plan goes on to propose an additional and redundant regulatory review process. The process to implement the Land Use Plan would be complex, expensive, redundant to existing process, and add additional uncertainty to the process.

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The upstream petroleum industry is the largest single private sector investor in Canada – investing over \$50 billion each year and employing more than 500,000 Canadians. As evidenced by the recent, record-setting \$530 million land sale in the Central Mackenzie Valley, there is clear interest to invest in the NWT. Such investment can create jobs and generate wealth that can benefit all Canadians. Complicated and inefficient regulatory processes can kill projects, and the economic benefits and jobs associated with them.

CAPP's position on regulatory process is guided by three principles that we believe must frame regulatory reform efforts at all levels:

1. Balancing the “3 ‘E’s” – Advancing environmental performance, economic growth, and energy security and reliability to achieve balanced outcomes.
2. Achieving inter and intra-governmental coordination – Removing overlap and duplication between governments and across government departments.
3. Delivering timely and effective results – Establishing mandatory regulatory timelines with results based on sound science.

It is our opinion that the Draft Land Use Plan does not effectively address any of these principles.

For these reasons, CAPP cannot support Draft 3 of the Sahtu Land Use Plan.

Sincerely,



**Phil Langille**  
Manager, Federal Regulatory & Northern Affairs

cc: The Honourable David Ramsay, Minister of Industry, Tourism & Investment  
Janet King, ADM, Aboriginal Affairs and Northern Development Canada  
Ethel Blondin-Andrew, Chairperson, Sahtu Secretariat Incorporated