



March 25, 2026

Patricia Brady
Vice-President, Strategic Policy and Programs Sector
Impact Assessment Agency of Canada
22nd Floor, Place Bell
160 Elgin Street
Ottawa ON K1A 0H3

Dear Ms. Brady,

Re: The Draft Co-operation Agreement between Alberta and Canada on Environmental and Impact Assessment

The Canadian Association of Petroleum Producers (CAPP) and its members acknowledge the finalization and implementation of the draft *Co-operation Agreement between Alberta and Canada on Environmental and Impact Assessment* (draft co-operation agreement) as the starting point to affirm mutual respect for jurisdictional responsibilities. Fully implemented, it has the potential to streamline regulatory processes and support a favourable sentiment for developing major projects, including the development of Canada's natural resources.

Accelerating major project approvals and establishing a clear a "one project, one review, one decision" approach, have been, and remain priorities for our industry and Canada. The draft co-operation agreement will help to avoid duplication and recognize provincial processes, responsibilities, and leadership. To support its successful implementation, we recommend:

1. Clear guidance be developed to ensure the agreement is consistently implemented by the decision makers and regulators. Key terms, if left open to interpretation, will create uncertainty for project proponents and investment;
2. The *Physical Activities Regulations* be amended to align with the Supreme Court of Canada's (SCC) decision in *Reference re Impact Assessment Act, 2023*,¹ and
3. Additional action be taken federally to recognize provincial capacity to assess and regulate major projects within provincial jurisdiction and avoid duplicative protections, regulations, and process.

¹ [2023 SCC 23 \(CanLII\)](#) | [Reference re Impact Assessment Act](#) | [CanLII](#)

Achieving Canada’s ambition of becoming an energy superpower will depend on simplified and accelerated approvals for major projects. Canada’s complex and duplicative federal regulatory landscape has inhibited investment and reduced competitiveness. Growth in the oil and gas sector can have a meaningful, long-term, positive impact on our GDP and economy, \$30 billion per year,² but investment and growth will be contingent on a competitive regulatory and policy landscape.

A co-cooperation agreement must simplify regulatory processes and accelerate project approvals to support investor certainty. It also aligns with the call of the SCC in *Reference re Impact Assessment Act* for Parliament and the provinces to work together to "ensure the continued health of our shared environment". To achieve this, the following is necessary:

1. Clear guidance to steer implementation

CAPP supports the clear, committed, language used repeatedly in the draft co-operation agreement that non-renewable natural resources, local works and undertakings, and related matters fall within Alberta's exclusive legislative jurisdiction. It is clear that the intent is to rely on provincial processes. Its utility will hinge on it being effectively implemented.

Important terms in the draft co-operation agreement must be clearly defined for those implementing the agreement to ensure regulatory certainty. For example, commitments in the draft co-operation agreement to avoid duplicative processes: clear guidance need to indicate that **“duplicative” does not mean “exactly the same” for the purpose of relying on provincial processes.**

Similar risks exist with other key terms and concepts in the draft co-operation agreement, including:

- **“Projects primarily within provincial jurisdiction”:** Here, aligned with the distribution of powers under Part VI of *The Constitution Act*, **all projects should be defined as “primarily within provincial jurisdiction”** except those occurring on federal lands and those crossing provincial or international borders; and
- *Actions by the province to address adverse effects within federal jurisdiction:* Here outcomes of those actions, rather than processes, must explicitly be the measure. **Effective**

² ATB Financial, [The GDP Payoff of Additional Pipeline Capacity](#), 2026

implementation of the co-operation agreement must recognize that acceptable provincial actions to address adverse effects may be different from the federal approach. Provincial and federal actions do not need to be the same in order to address the relevant adverse effects.

Clauses 11(1) through 11(3) of the draft co-operation agreement recognize the importance of collaborative, timely and consistent interpretation and application of the agreement. This is a welcome addition, including the explicit commitment to resolve differences at the working level prior to seeking intervention by senior officials. These clauses reinforce the value of written guidance documents to create consistency and provide the working level staff, tasked with finding agreement, the discretion to make decisions and find compromise in the spirit of the agreement.

Recommendation 1: Create clear, codified, guidance documents so the co-operation agreement is meaningfully and consistently implemented to simplify and accelerate approvals.

2. Amend the *Physical Activities Regulations*

In 2024, the Impact Assessment Agency of Canada published the *Discussion Paper on the Project List Review*.³ CAPP provided feedback at the time ([link](#)) and our position remains highly relevant to the development of co-operation agreements and the need for clear, predictable, and legally robust regulatory regime for major project approvals.

The 2024 discussion paper emphasized the need to review and potentially amend the *Physical Activities Regulations* to ensure their alignment with the SCC's decision in the *Reference re the Impact Assessment Act*. This work, including **streamlining the project list in accordance with the SCC's decision and CAPP's previous feedback, should be prioritized.**

Comprehensive amendments to the project list, specifically to the sections on *Oil, Gas and Other Fossil Fuels* will help align the regulation with the SCC's opinion in the *Reference re the Impact Assessment Act* and streamline project development. **Fundamentally, any project type that will not have a high probability of causing significant adverse effects within federal jurisdiction should be removed from the project list.** This includes building, expanding, or decommissioning of:

- in situ oil sands facilities,
- fossil fuel-fired power generation,

³ [Discussion Paper on Proposed Project List - Canada.ca](#)

- refineries and upgraders,
- gas processing facilities,
- inland liquified natural gas facilities, and
- storage facilities.

These activities are unlikely to consistently and meaningfully impact the marine environment, fish and fish habitat, migratory birds, or the rights of the Indigenous peoples of Canada. Therefore, it is reasonable to expect these projects would not pose risks of causing material adverse effects within federal jurisdiction. Such an approach is consistent with the allocation of powers under the Constitution, which seeks to allocate responsibility to the level of government closest to the issue.

To provide greater surety and consistency of application, Section 9 of the *Impact Assessment Act* should also be amended. New language should **clarify that the Minister’s discretion to designate projects is limited to new, novel, or unique projects that pose a real risk of significant adverse effects within federal jurisdiction**. As currently drafted, Section 9 creates the impression that the Minister can bring any large project into the federal assessment process, a significant source of uncertainty for project proponents.

Recommendation 2: Expedite critical amendments to the *Physical Activities Regulations* and *Impact Assessment Act*, to align them with SCC’s direction and to simplify the approvals process by narrowing the list of projects potentially subject to federal assessment.

3. Additional measures to streamline federal process and avoid duplication

The Prime Minister has prioritized strengthening economic certainty, expanding export opportunities, reinforcing energy and national security, and supporting allies with reliable supply. Canadian and provincial governments and regulators should be contributing to these national objectives by reducing investment risk and enabling responsible growth. This will involve delivering critical reforms, including those identified by CAPP in its February 2026 submission to the Treasury Board regarding its red tape reduction initiative (copy attached).

CAPP and its members continue to see an expansion of federal requirements. This is increasing uncertainty and complexity for project proponents and operators. Work should be undertaken to ensure that all environmental protections and consultations undertaken by provinces are not duplicated by federal requirements. This includes opportunities to streamline requirements for climate action, oil sands effluent regulations, migratory bird protection, fisheries, and avoiding potential complexities associated with Indigenous Ministerial Arrangement Regulations and Co-

Administration Agreement Regulations. Canada needs to focus on streamlining and attracting investment.

Recommendation 3: Recognize provincial capacity to assess and regulate major projects within provincial jurisdiction and eliminate duplicative federal protections, regulations, and process.

CAPP looks forward to the timely finalization and comprehensive implementation of the draft co-operation agreement, amendments to the *Physical Activities Regulations*, and continued engagement with the IAAC to further accelerate major projects and Canada's economy.

Sincerely,

A handwritten signature in black ink that reads "Johanne Sénécal". The signature is written in a cursive, flowing style.

Johanne Sénécal
Vice President, Sustainability, External Relations and Indigenous Affairs



**2026 Red Tape Reduction
Submission**

Cutting Red Tape to
Unleash Canada as an
Energy Superpower
February 2026

The Canadian Association of Petroleum Producers (CAPP) is a non-partisan, research-based industry association that advocates on behalf of our member companies, large and small, that explore for, develop, and produce oil and natural gas throughout Canada. CAPP's members produce nearly three quarters of Canada's annual oil and natural gas production, and our associate members provide a wide range of services that support the upstream industry.

Canada's upstream oil and natural gas industry provides approximately 450,000 direct and indirect jobs in nearly all regions of Canada. Last year, the industry contributed over \$85 billion to Canada's GDP, delivered over 20 percent of the country's value of exports, and between 2022 and 2024 generated \$116 billion in taxes and royalties for governments nationwide.

CAPP is a solution-oriented partner and works with all levels of government to ensure a thriving Canadian oil and natural gas industry. We strive to meet the need for safe, reliable, affordable, and responsibly produced energy, for Canada and the world. We are proud to amplify industry efforts to reduce GHG emissions from oil and gas production and support Indigenous participation and prosperity.



February 25, 2026

The Honourable Shafqat Ali, P.C., M.P.
President of the Treasury Board
Treasury Board of Canada
90 Elgin Street Floor 8
Ottawa, Ontario K1A 0R5
Email: president-presidente@tbs-sct.gc.ca

RE: Horizontal Red Tape Review

Dear Minister,

The Canadian Association of Petroleum Producers (CAPP) appreciates the work underway at the Treasury Board and Treasury Board Secretariat to simplify regulation, reduce costs for Canadians and businesses and support economic growth looking into system-wide regulatory efficiency opportunities.

We welcome the federal government's recognition that Canada's regulatory environment must be improved. CAPP's members also appreciate and are aligned with Treasury Board's aim to enable more efficient reviews of major projects, simplify regulatory pathways to get products to market faster, cutting red tape that hinders productivity, identifying and alleviating trade irritants, and empowering more reliable and transparent regulatory service delivery across government. This horizontal red tape review is a welcome step in the government's overdue policy reset.

Over the past decade, increasing policy complexity and uncertainty have delayed investment, reduced competitiveness, and caused Canada to miss significant economic opportunities. **Major reforms are needed to grow the GDP, strengthen economic sovereignty, attract investment, increase productivity, create high-quality jobs, support provincial leadership, and maintain investor confidence—particularly in a period of low commodity prices.** CAPP's members share the goals outlined by Prime Minister Carney: growing production, expanding infrastructure, protecting competitiveness, and lowering greenhouse gas emissions. Budget 2025's commitment to mobilize \$1 trillion in investment over five years, alongside the Canada-Alberta MOU and the federal commitment to becoming an energy superpower, are important steps toward unlocking Canada's world-class resources.ⁱ

That said, to meet the geopolitical and economic challenges of this moment, **Canada must act with alacrity to simplify regulatory processes, accelerate project approvals, and respect provincial jurisdiction to restore investor certainty.** Ensuring export infrastructure is in place is critical for enabling upstream production to meet market demand.

2800, 421 – 7 Avenue S.W. Calgary, AB Canada T2P 4K9 Tel 403-267-1100	1820, 275 Slater St. Ottawa, ON Canada K1P 5H9 Tel 613-288-2126	1004, 235 Water St. St. John's, NL Canada A1C 1B6 Tel 709-724-4200	201, 1114 Langley St. Victoria, BC Canada V8W 1W1 Tel 778-265-3819
---	--	---	---

It also means rethinking our carbon policy and regulatory framework. The current federal system has proven costly, complex, and globally uncompetitive. We must continue advancing emissions reduction technologies to enhance our environmental leadership while keeping energy affordable and competitive. This includes letting provinces take the lead on any emissions reductions policies and pricing systems in their jurisdictions and supporting innovations such as methane abatement and carbon capture as well as aligning our emissions reduction goals with our partners and other allied major oil and gas producing nations.

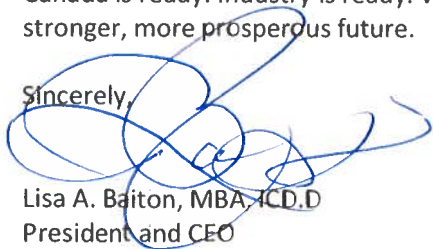
The global oil and natural gas market remains highly competitive. Over the last fifteen years, due to an uncompetitive regulatory and policy landscape, pipeline bottlenecks, and overreliance on a single customer, the forfeited revenue to Canada's upstream industry on heavy oil and bitumen sales alone is US \$49 billion.ⁱⁱ Today, the United States—now the world's largest producer and consumer—is advancing further regulatory reform and simplification, as well as amendments to the tax regime to attract investment and lower domestic energy costs.ⁱⁱⁱ Recent international developments highlight the need for Canada to demonstrate similar resolve.

Canada can lead as a reliable, responsible supplier of energy to global markets. Achieving this requires timely, targeted regulatory and policy adjustments that drive economic development and strengthen Canada's geopolitical position. Expanding energy exports will strengthen our sovereignty and diversify trade; oil and gas exports accounted for over 20 percent of Canada's total trade value in 2024.^{iv} Increased exports and revenues from increased industrial activity will support priorities such as national security; between 2022 and 2024, the sector contributed nearly \$116 billion in taxes and royalties.^v Indigenous economic participation will also grow; since 2017, more than \$5 billion in Indigenous equity positions have been secured in oil and gas projects. Today, our sector supports nearly 450,000 direct and indirect jobs, contributes \$85 billion to GDP annually, and leads all sectors in environmental protection investments.^{vi}

Global energy demand continues to rise, and **Canada's window of opportunity is narrowing**. CAPP's attached list of red tape review recommendations aim to deliver regulatory certainty, advance economic growth, and solidify Canada's role as an energy leader.

Canada is ready. Industry is ready. Working together, we can remove unnecessary barriers and build a stronger, more prosperous future.

Sincerely,



Lisa A. Baiton, MBA, ICD.D
President and CEO

ⁱ [Mandate Letter | Prime Minister of Canada](#)

ⁱⁱ https://www.cogem.energy/publications/gauging_canadas_energy_ambition

ⁱⁱⁱ FACT SHEET: Delivering On U.S. Oil And Natural Gas Production | Department of Energy [FACT SHEET: Delivering On U.S. Oil And Natural Gas Production | Department of Energy](#)

^{iv} CAPP Data Centre: The Economic Impact of Canadian Oil and Gas <https://www.capp.ca/wp-content/uploads/2023/12/The-Economic-Impact-of-Canadian-Oil-and-Gas.pdf>

^v CAPP Data Centre and CAPP internal analysis: <https://www.capp.ca/wp-content/uploads/2023/12/The-Economic-Impact-of-Canadian-Oil-and-Gas.pdf>

^{vi} CAPP Data Centre and CAPP internal analysis: <https://www.capp.ca/wp-content/uploads/2023/12/The-Economic-Impact-of-Canadian-Oil-and-Gas.pdf>

1 Recommendations for Red Tape Reduction

1.1 Environment and Climate Change Canada

1.1.1 Industrial Carbon Pricing

Improve Canada’s industrial carbon pricing policy with a clear focus on global competitiveness and economic growth, including:

- **Do not proceed** with the proposed policy changes outlined in ECCC’s “Driving Effective Carbon Markets in Canada” discussion paper, published December 19, 2025.
- Finalize commitments identified in the Canada-Alberta Memorandum of Understanding, which outlines major changes to Alberta’s industrial carbon system and commits to develop revenue recycling protocols.
- Work with provinces and territories that have shown how industrial carbon pricing and free credit markets can deliver emissions reductions and leverage the solutions in their systems to make them more competitive.

1.1.2 Draft Methane Regulations

Deliver efficiency and certainty to fix problematic federal methane regulations through effective provincial equivalency agreements.

- The final federal methane regulations present significant challenges for the industry; they are impractical and unworkable, creating inefficiencies and necessitating expensive retrofits and inspections.
- To protect Canadian competitiveness, alternative, more efficient provincial approaches are necessary.
- Canada needs to solely rely on high-quality provincial data, and the provinces’ proven track record of methane emissions abatement, to support new outcomes-focused equivalency agreements.

1.1.3 Oil and Gas Emissions Cap

Continue to ensure that the proposed oil and gas emissions cap does not proceed to implementation.

1.1.4 Oil Tanker Moratorium Act

Lift the moratorium on oil transportation from British Columbia’s North Coast (C-48).

1.1.5 Species at Risk Act

Amend the Species at Risk Act to properly reflect constitutional authority over lands and natural resources, increase efficiency, and to include provisions for socioeconomic impact analysis to inform decision making.

1.1.6 Environmental Emergencies Regulation (E2 Regulations)

Reduce administrative burden under the E2 regulations to eliminate the current duplication of emergency preparedness (i.e. exercises) and reporting requirements (i.e. class-based groupings), as well as enhanced regulatory clarity (i.e. definition of a facility) across ECCC, Transport Canada, and the Energy Regulators (CER, AER, SK ER, and the BCER).

1.1.7 Prohibition of Certain Toxic Substances Regulations, 2025

Develop an extended phase-in period of six to ten years for offshore oil and gas installations for the regulations, in recognizing the fundamental differences between conventional oil and gas facilities and offshore oil and gas operations – operating in harsh environmental conditions.

On December 31, 2025, ECCC published the *Prohibition of Certain Toxic Substances Regulations, 2025*, which come into force on June 30, 2026. This prohibition includes firefighting foams used in the petroleum industry called aqueous film-forming foam (AFFF), the most widely used and available of these foams in current offshore operations. To find suitable alternatives to AFFF without harming operations, CAPP is requesting ECCC work with offshore oil and gas operators to implement an extended phase-in period for these new regulations.

1.1.8 Spill Treating Agent Regulations

Enhance spill response capabilities through amendments to Schedule 1 of the Regulations Establishing a List of Spill-Treating Agents.

- Schedule 1 lists only two spill-treating agents that are approved for use in Canadian waters, both of which are no longer being manufactured.
- Given this context, CAPP recommends the addition of other spill-treating agents to the regulations, including all products currently available in the Global Dispersant Stockpile.

1.1.9 Migratory Birds Regulations, 2022

Collaborate with CAPP to address administrative burden and resource sterilization risks linked to the Pileated Woodpecker's Schedule 1 listing under the Migratory Birds Regulations, 2022. And reduce administrative burden and regulatory uncertainty by developing compliance tools for high importance activities that present low-risk to migratory birds.

1.2 Impact Assessment Agency of Canada

1.2.1 Impact Assessment Act

Amend the Impact Assessment Act (IAA) to deliver major project investment.

Build on recent cooperation agreements between Canada and select provinces and territories, as well as MPO and IAAC actions to reduce approval timelines. All project applications must be processed in a timely, predictable, and efficient manner, free from duplicative processes across government. Amendments should:

- Limit assessments to exclusively consider significant adverse effects within federal jurisdiction.

- Align decision-making criteria with the Supreme Court of Canada guidance in *Reference RE Impact Assessment Act 2023*, focusing the public interest decision on a project's federal effects.
- Commit to firm deadlines to further reduce regulatory timelines so that major projects are approved within six months of application.
- Streamline the *Physical Activities Regulation* to include only projects which pose a high probability of causing significant adverse effects within federal jurisdiction. Projects we recommend removing from the regulation include *in situ* oil sands facilities, fossil fuel-fired power generation, refineries and upgraders, gas processing facilities, inland liquified natural gas facilities, storage facilities, and offshore exploratory wells.
- Establish provincial substitution as the default to deliver “one project, one review” by relying on existing rigorous and effective provincial regulatory frameworks to conduct assessments of adverse effects.
- Introduce a “directly and adversely affected test” as the basis for ensuring public and stakeholder input is material, relevant, and focused.
- Establish exploration drilling regional assessments for the Province of Nova Scotia and other interested jurisdictions.

1.3 Natural Resources Canada

1.3.1 Offshore Oil and Gas Methane Regulations

Establish clear and consistent regulatory requirements for methane reporting under the “Canada-Newfoundland and Labrador Offshore Area Petroleum Operations Framework Regulations and the Canada-Nova Scotia Offshore Area Petroleum Operations Framework Regulations” to provide regulatory certainty and support effective compliance measures in line with federal and provincial requirements.

1.4 Finance Canada & the Canada Revenue Agency

1.4.1 Bare Trust Reporting

Reduce administrative burden on the oil and natural gas sector by amending section 150 of the Income Tax Act. To support Canada’s global commitment to transparency in combatting money laundering and terrorist financing, leverage existing corporate and partnership filings to declare participation in bare trust arrangements and rescind the current T3 reporting requirement. This would avoid the need to file tens of thousands of annual T3 returns.

CAPP would welcome the opportunity to provide Finance Canada with further recommendations on this file.

Amend the ITA with the following revisions to address the type of property and ownership concerns. Specifically:

- Revise proposed paragraph 150(1.31)(f) to focus on any property that is held by a “principal business corporation” as defined in subsection 66(15), or a partnership that

would otherwise be a principal business corporation if it was a corporation and each of these beneficial owners would also be defined in subparagraphs 150(1)(f)(i) to (iv);

- Revise proposed paragraph 150(1.31)(f) to relax the “each of which is” constraint to allow a threshold for minority joint venture partners that do not meet the eligibility requirements (e.g., a trust would not be required to file if the majority of the beneficial ownership of the trust property is held by public companies).

1.4.2 Excessive Interest and Finance Expenses Limitation Rules (EIFEL)

Amend the Excessive Interest and Financing Expenses Limitation (EIFEL) provisions in section 18.2 of the Income Tax Act (ITA) to ensure producer surface lease and mineral lease payments are not treated as economically equivalent to interest. The current EIFEL definition of “interest and financing expenses” captures certain non-interest amounts, creating interpretive risk that routine surface lease payments and provincial Crown mineral payments could be misclassified, despite being long-standing routine operational costs. Clarifying the scope of EIFEL would reduce administrative burden for the oil and natural gas sector. CAPP would welcome the opportunity to provide Finance Canada with specific recommendations on this matter.

1.4.3 Simplification of Capital Cost Allowance Classifications

Simplify the Capital Cost Allowance (CCA) framework set out in Part XI of the Income Tax Regulation (ITR) to reduce reporting and compliance burdens and ensure a METR advantage for the oil and natural gas industry. Decades of policy changes have made the CCA framework increasingly complex. An expert review of the corporate tax system should prioritize the simplification of the CCA framework, such as reducing the number of classes, fewer standardized rates, and simplified rules for special assets to improve efficiency and transparency and attract the capital investment needed for Canada to become an energy superpower. CAPP would welcome the opportunity to share examples and recommendations with Finance Canada.

1.5 Fisheries and Oceans Canada (DFO)

Create certain, predictable, and efficient regulatory processes under the Fisheries Act. Specifically:

- Simplify approvals of offshore projects by adjusting the *Fisheries Act* Authorization process to remove the requirement for a *Fisheries Act* Authorization Review and proceed directly with a *Fisheries Act* Authorization Application.
- Define “harmful alteration, disruption or destruction of fish habitat” and the criteria used to determine whether an activity creates alteration, disruption or destruction of fish habitat.
- Allow multiple proponents to contribute to and withdraw from a habitat bank.
- Expediently develop and finalize compliance tools (e.g., codes of practice, Prescribed Works and Waters Regulation).
- Increase training and capacity building for new DFO staff in regional offices and publicly release training and guidance developed for DFO staff training.

1.6 Canada Energy Regulator

1.6.1 Onshore Pipeline Regulations and Filing Manuals & Improving Regulatory Coherence and Efficiency

CAPP recommends that the CER create a modernized regulatory framework in the CER Onshore Pipeline Regulations for upstream pipelines that would designate producer pipelines that cross a provincial boundary to the appropriate provincial regulator.

- The CER regulates both large-diameter transmission pipelines that transport oil and natural gas over long distances, and smaller pipeline segments used in oil and gas production which cross provincial boundaries. These smaller upstream pipeline segments typically connect wells to processing facilities and are closely integrated with provincially regulated systems – yet they are subject to different requirements and oversight structures. Because of their smaller volumes, they present relatively lower risks than the large transmission pipelines.
- Having small-diameter onshore producer pipelines under federal jurisdiction creates unnecessary regulatory duplication and complexities.
- Federally regulated small-diameter onshore producer pipeline segments (which typically connect wells to processing facilities that are integrated with provincially regulated systems) should be brought under provincial jurisdiction to align regulatory frameworks, streamline compliance obligations, and reduce administrative burden – without compromising safety or environmental protection.

1.7 Transport Canada

1.7.1 Transportation of Dangerous Goods Regulations

CAPP recommends that further user interface and operability improvements be made to Transport Canada's new Client Identification Database to reduce administrative burden, minimize errors and improve communication between regulators and operators. (As per the TDGR Part 17 Registry Database).

Furthermore, within Transport Canada's purview via the Transportation of Dangerous Good Regulations (TDGR), CAPP and its members request the following:

- Further alignment with international codes;
- Further efforts to reduce the burden of equivalency certificates;
- Enable electronic shipping documents not solely for rail and drones as noted by Transport Canada, but also for road and air transportation as well.

1.7.2 Marine Personnel Regulations

Publish the draft Marine Personnel Regulations in Canada Gazette I by the end of 2026.

Align offshore marine training requirements with the Atlantic Canada Offshore Training and Qualifications Committee (TQC) guidelines. The TQC is an independent committee of offshore regulators, operators, and workforce, whose guidelines have been adopted as a Code of Practice by the offshore energy regulators under section III.1 of the Atlantic Accords.

1.8 Employment and Social Development Canada

1.8.1 Canada Labour Code

CAPP recommends that ESDC encourage harmonized, evidence-based approaches to setting occupational exposure limits (i.e. benzene, hydrogen sulphide) across jurisdictions – supported by cross jurisdictional cooperation to ensure consistent worker protection, operational feasibility and reduced compliance burden.

- Inconsistent approaches to revising occupational exposure limits (i.e. automatic adoption of Threshold Limit Values (TLVs) published by the American Conference of Governmental Industrial Hygienists (ACGIH) without review) across Canadian jurisdictions are creating compliance challenges, resulting in technically unachievable expectations and increased regulatory complexity for multijurisdictional employers.