March 27, 2019

The Standing Senate Committee
on Energy, the Environment and
Natural Resources
enev@sen.parl.gc.ca

SUBJECT: BILL C-69 Hearings
Written Evidence

Dear Madam Chair and Members,

Please find attached my Written Evidence for the April 9 Hearing in Calgary.

Thank you for your time and consideration.

TESTIMONY OF
WIM M. VELDMAN, M.Sc., FEIC, P.Eng.
TO
THE STANDING SENATE COMMITTEE ON ENERGY,
THE ENVIRONMENT AND NATURAL RESOURCES
RE: BILL C-69

1.0 INTRODUCTION

• Thank you Madam Chair and Committee Members for the opportunity to present my input.
• I will restrict my comments to the NEB and pipelines.
• My input is based on 45 years of experience in the design, approval, construction and operation of pipelines in North and South America, see my Resumé Attachment 1.
• The review of pipelines must consider their full life cycle, not just their initial review which is the primary focus of this Bill. I trust my life cycle experience, examples being:
  – 45 continuous years with the Trans Alaska Pipeline System (TAPS),
  – Nearly 20 years with the GasAtacama pipeline in Argentina,
will be valuable to your Committee.

2.0 HOW DID WE GET HERE?

• The Prime Minister’s Mandate letters to Min. Carr and Min. McKenna (November 2015) and to Min. Sohi (August 2018).
• The May 2017 Expert Panel’s Report on the Modernization of the National Energy Board (see my assessment, and that of 30 professionals with more than 1,000 years of experience, Attachment 2). This led to Bill C-69.

3.0 WHAT WERE THE POSSIBLE OUTCOMES OF MIN. CARR’S NOVEMBER 2015 MANDATE TO “MODERNIZE THE NEB”?

• Option 1 – Maintain the NEB and modernize it via refinement/tweaking of its regulations and processes.
• Option 2 – eliminate and replace the NEB with the organizations and procedures as per Bill C-69.
• Option 3 – Maintain the NEB, while meeting the government’s objectives and enhance it with additional checks and balances.

4.0 OPTION 1 – MAINTAIN THE NEB, REFINE/TWEAK IT

• The NEB is continuously evolving – the Expert Panel noted this and concluded the NEB is “respected internationally” and “benchmarking has placed Canada among the most stringent of regulatory regimes.”
• I challenge any person with extensive professional experience in the life cycle of pipelines to detail how much more rigid, the NEB’s TMX Decision Report and its Conditions could have been. Yes TMX’s approval was challenged but primarily by stakeholders who had clearly stated that they would oppose it, regardless.

• The optimum outcome of a “modernization” mandate may be to do little – Panama Canal Authority for example concluded this re: a modernization review of its locks.

• The existing NEB process is not broken. Canada’s major pipelines have an excellent safety record.

5.0 OPTION 2 – ELIMINATE THE NEB AND REPLACE IT WITH THE PROCESS AS PER C-69

• A comparison of the Government’s Objectives and Expectations with C-69 versus Realities and Conclusions is presented on Figure 1.

• A rational evaluation must conclude that C-69 fails to meet the Government’s key stated objectives.

• A couple of its fatal flaws are:
  – CEPA representing companies that transport 97% of Canada’s oil and gas have concluded that “It is difficult to imagine that a new pipeline could be built in Canada under the Impact Assessment Act.” Thus the Government’s mandates to “ensure our resource sector remains a source of jobs, prosperity” and our “core responsibility is to help get our natural resources to market” are not achieved via C-69.
  – Political go/no go decisions will increase while transparency will decrease. The 2017 Expert Panel concluded that people objected to the opaque process of decisions, “especially true for the decisions by Cabinet.”
  – Predictability and timelines will be harmed not improved by C-69. Delays, especially in political decisions prior to and after elections, is a foreseeable outcome.
  – Public trust in the review process will not be rebuilt, in fact I believe the opposite will occur as a result of eliminating the “standing” test for participants in the hearing process. For example if I, as a Calgary resident and river engineer, appeared at a Hearing for a proposed St. Lawrence River bridge in Montreal, I would expect the Panel to conclude in their Decision Report that “since Mr. Veldman is not directly impacted by the proposed project, his views were irrelevant in making our decision.”
  – Expanding the review scope to include climate change, reconciliation, and gender objectives will, due to their highly subjective nature, increase the likelihood of legal challenges and thus result in additional delays.

• In my opinion, these fatal flaws are not fixable via Amendments.

6.0 OPTION 3 – MAINTAIN THE NEB AND COMPLEMENT IT WITH ADDITIONAL CHECKS AND BALANCES

• The Government’s 2015 objective to Modernize the NEB is lauded. Don’t destroy it, don’t replace it but instead build on its “respected” and “stringent regulatory regime.”

• Table 1 outlines my proposed 10 Step Plan to produce NEB v2.0.
• A key recommended additional step in the NEB regulatory process would be the establishment of a 3-5 person Independent Review Board that conducts multi-day reviews and provides input at three (3) critical times during the life cycle of the applications. Its report would be included in the NEB’s Decision Report. IRBs are a key component for many major projects.

7.0 CONCLUSIONS

• Canada has an excellent track record of building and safely operating pipelines under the NEB regime.

• Canada has proven again and again that it can and does meet strict environmental standards. Just one example – the 2007, 160 km long Trans Mountain Anchor Loop Project through Jasper National Park and Mount Robson Provincial Park earned the Alberta Emerald Award for “excellent environmental initiatives.”

• Bill C-69 is not a “modernization” of the NEB as per Min. Carr’s mandate, it is a total replacement. The government’s stated objectives will not be met by C-69.

• Can and should the NEB be “modernized” as per Min. Carr’s November 2015 Mandate? Yes, I have presented my ideas.

8.0 WRAP-UP

• The pipeline companies that transport 97% of Canada’s oil and gas have clearly stated that with C-69, they cannot imagine applications for new pipelines. This will result in a halt in the development of our natural resources.

• Therefore C-69 with respect to pipelines will violate the government’s core responsibilities to:
  – “help get our natural resources to market,”
  – “ensure that our resources sector remains a source of jobs, prosperity.”

• The government and the Senate must therefore conclude and state that “we tried, but as a result of a sober second thought, we find that the likely outcomes of Bill C-69 are not in accordance with the government’s core responsibilities. Instead we will immediately consult with key stakeholders to further enhance and strengthen the NEB process for pipelines”

• Thank you Madam Chair and Committee Members for your time and consideration.


Enclosures:

Figure 1 – Bill C-69, Objectives vs. Reality
Table 1 – NEB v.2.0, A 10 Step Plan
Attachment 1 – Wim M. Veldman, Pipeline Resumé
Bill C-69 - Objectives vs. Reality

**Government Objectives**

1. "Modernize the NRB"  
   (Carr Mandate, Nov. 2015)
   - The 2017 NEB Modernization Expert Panel stated:
     - "NEB is respected internationally"
     - "benchmarking has placed Canada among the most stringent of regulatory regimes"
   - The NEB has evolved - compare scope and detail of approval conditions from Mackenzie Gas (2004) to TransMountain (2016). Recommendations in a 2015 federal audit of the NEB have been adapted by the NEB (Expert Panel).
   - McKenna has stated that TransMountain expansion "would have been approved" under Bill C-69.

2. "Core responsibility is to help get our natural resources to market"  
   (Carr, Nov. 2015)
   - "Goal to ensure that our resource sector remains a source of jobs, prosperity"  
   - "Benchmarking has placed Canada among the most stringent of regulatory regimes"
   - McKenna has stated that TransMountain expansion "would have been approved" under Bill C-69.

3. Greater transparency, predictability and timelines in decision making  
   - Decisions guided by science
   - "It is difficult to imagine that a new major pipeline could be built in Canada under the Impact Assessment Act".
     - Canadian Energy Pipeline Association (CEPA) submission to Parliament, March 2018
   - Public "did not object to the outcome of a decision (by the NRB) so much as the opaque process by which it is achieved. This is especially true for the decisions rendered by Cabinet...".
     - NRB Expert Panel, 2017
   - "Government is maintaining control over the final decisions"  
     (March 2018).

4. Rebuild public trust  
   (Carr, McKenna, 2015 Mandates)
   - Inclusive and meaningful public engagement
   - Public trust will be eroded, not rebuilt, as a result of inclusive and full participation as:
     - in assessing projects, the effect on those directly impacted should be given prime consideration,
     - all the other participants, whose input is rightly given little or no "weight", will be very frustrated.
   - The public was given every opportunity to engage in TMX and offered funding. Certain groups and cities simply refused to participate.

**Reality**

**Conclusion**

- The 2016 TMX decision report is detailed (157 conditions) and transparent - the process met the C-69 requirements.
- Thus the logical outcome of the modernization directive would have been to tweak or update the NEB, not destroy it.
- The companies that transport 97 percent of Canada's gas and oil have no confidence in the new regulations.
- Thus no new pipelines = no new jobs.
- Go / no go up front decisions by government (re: broad public policy such as upstream and downstream GHG emissions, climate change objectives, Indigenous reconciliation) are subjective, not science based.
- Bill C-69 will not meet the stated objectives.
- Those opposed to oil development, pipelines and tankers will do so regardless of the regulatory process - they have stated so.
- The NEB process never lost the trust of the majority - see the conclusions of the Expert Panel.


March 27, 2019
<table>
<thead>
<tr>
<th>TABLE 1</th>
<th>NEB v2.0 – A 10-STEP PLAN</th>
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<tbody>
<tr>
<td><strong>LOGICAL GO-FORWARD</strong></td>
<td><strong>MAINTAIN THE NEB</strong></td>
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<td>• Minister’s Mandate letter “modernize the NEB... and has sufficient expertise...”</td>
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<td>• The Expert Review Panel concluded:</td>
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<td>+ “NEB is respected internationally” and “benchmarking has placed Canada among the most stringent of regulatory regimes.”</td>
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<td>• A rationale conclusion would have been –modernize the NEB as per the Mandate, don’t destroy it via Bill C-69.</td>
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<td><strong>POLICY</strong></td>
<td><strong>ESTABLISH CANADA TO BE ENERGY INDEPENDENT BY 2030</strong></td>
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<td>• In an uncertain geopolitical world, this objective should be accepted by all.</td>
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<td><strong>ESTABLISH CANADA AS AN EXPORTER OF RESOURCES</strong></td>
<td><strong>MINIMIZE POLITICAL INFLUENCE</strong></td>
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<td>• “One of the fundamental responsibilities of any Canadian prime minister is to get Canadian resources to international markets.” (Prime Minister)</td>
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<td>• Bill C-48, the Tanker Ban, is a violation of this fundamental responsibility.</td>
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<td><strong>TRANSPARENT</strong></td>
<td><strong>IDENTIFY DIRECTLY IMPACTED STAKEHOLDERS</strong></td>
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<td>• NEB and Federal Government establish list of all directly impacted stakeholders up front following establishment of criteria such as land ownership, traditional land use and zone of influence of construction and operation.</td>
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<td><strong>HEARING PROCESS</strong></td>
<td><strong>LIMIT HEARING PARTICIPATION TO DIRECTLY IMPACTED STAKEHOLDERS</strong></td>
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<td>• The result of Bill C-69, to provide inclusive public input, will be:</td>
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<td>+ input by the public, not directly impacted, should be given little or no “weight” or consideration,</td>
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<td>+ thus having their input rightfully disregarded, frustration at the consultation process will increase, not decrease.</td>
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<td><strong>PRINCIPLE</strong></td>
<td><strong>ESTABLISH MAJORITY RULES – DISAGREEMENT IS NOT A VETO</strong></td>
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<td>• Full and meaningful consultation with directly impacted stakeholders may not result in 100% agreement. Opposition by a minority does not equal a Veto - an established and essential principle in our democracy.</td>
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<td><strong>NEW CHECK</strong></td>
<td><strong>ESTABLISH INDEPENDENT REVIEW BOARD (IRB)</strong></td>
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<td>• An additional check and balance on the NEB process. IRB reviews NEB process three (3) times during the life-cycle of major applications.</td>
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<td>• Publish the IRB’s report in NEB Decision Report.</td>
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<td><strong>TRANSPARENT</strong></td>
<td><strong>PREPARE 5-10 PAGE LAYMAN SUMMARY OF NEB DECISION</strong></td>
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<td>• Make available on line. Highlight project, modifications as a result of input/concerns of directly impacted stakeholders and reasons why certain requested changes could not be met.</td>
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<td>• Include a “matrix” of all consultation steps with the directly impacted stakeholders. List groups who refused to fully participate.</td>
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<td><strong>FOLLOWUP</strong></td>
<td><strong>PUBLISH STATUS OF NEB APPROVAL CONDITIONS AND FOLLOW UP PERMITS EVERY SIX MONTHS</strong></td>
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<td>• The NEB approval is only the first step. Fulfillment of the Conditions, in many instances, requires further stakeholder input and review.</td>
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<td>• Detailed plans and federal provincial approvals for critical components such as river crossings typically provide additional opportunity for public input.</td>
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WIM M. VELDMAN M.Sc., FEIC, P.Eng.
International Hydrotechnical Consultant

Overview
Mr. Wim Veldman has 50 years of experience in the planning, design and construction of major water resources, flood control, pipeline, hydroelectric, mining and shoreline projects in Canada, the USA and overseas. His experience is highlighted by 7 years in the design of flood control and major hydroelectric stations in Manitoba, 3 years as a full time senior consultant on the design and construction of the river crossings for the $8 billion trans Alaska oil pipeline, and 40 years as an independent consultant (see www.wimveldman.com).

Wim's scope of work ranges from planning, to serving as an expert witness, to organizing public input and meetings, to detailed design, to project management and construction supervision and to inspections and monitoring. Long term relationships with a number of major companies in Canada and the US, such as the trans Alaska oil pipeline for more than 40 years, attest to the trust and value clients place on his input.

Internationally, Wim has been involved in projects in Indonesia, Sri Lanka, Mongolia, Tanzania, Ethiopia, China, Chile, Yemen, Argentina, Ecuador, Peru and Bolivia.

"You did an outstanding job in providing the hydrologic studies for Atigun. I definitely like your style in making presentations to the regulatory agencies. You have created a tremendous amount of credibility for us with them."
Alyeska Pipeline Service Company
Anchorage, Alaska
$100 million, 8 mile long replacement

"Without your skills in engineering the diversions and containment dykes, dealing with the regulatory agencies on such matters and directing the actual work processes on these activities, we would have floundered"
Shell Canada Limited
Red Deer River pipeline break

"You have been selected as a well qualified expert with the necessary independence and integrity to carry out an assignment on behalf of both parties."
City of Calgary/Lafarge Canada
Bridge Impacts/Floodplain Studies

"Your professional calm and ability to deal with our difficult negotiations was critical over the past year."
Athabasca Chipewyan First Nation versus BC Hydro

RESUME FOCUS - PIPELINES
PIPELINES

Since 1973-1977 when he was the senior hydrologic consultant to Alyeska Pipeline Service Company for the design and construction of the $8 billion, 800 mile oil pipeline in Alaska, Wim has been involved in numerous major pipeline projects. He continues as a senior consultant to Alyeska and this long term hands-on experience has been the foundation for his pipeline experience. Wim’s experience ranges from routing a pipeline in Tanzania to the design / permitting of numerous crossings in Western Canada to field supervision and permitting for a major repair of a sour gas pipeline break in the Red Deer River. He is presently involved in the design and field engineering of major pipeline projects in Canada and the U.S. (also see “Publications and Major Presentations”)

DETAILS

The development of sound and practical pipeline river crossing designs as well as associated environmental impact assessments, requires extensive design, construction and operational monitoring experience. Wim’s long-term involvement in the following major and challenging pipelines forms the basis for his input:

- Trans Alaska oil pipeline (40+ yrs),
- Mackenzie Gas Project (5 yrs),
- Trans Mountain Looping and Reactivation (10+ yrs),
- Alaska LNG and Alaska in-state lines,
- Other proposed major gas and oil pipelines in western Canada.
- design/construction/monitoring of GasAtacama (Argentina 15 yrs), NorAndino (Argentina), OCP (Ecuador 4 yrs), Camisea (Peru 3 yrs), GasPacifico (Chile).
- also scoping work in Bolivia, Yemen and Tanzania.

Recognition of Wim’s experience has resulted in:

- awards from the Consulting Engineers of Alberta and Association of Consulting Engineers of Canada for the Argentina and Ecuador pipeline projects,
- being an invited speaker for a major pipeline conference in Alaska to present “Lessons Learned,”
- the preparation of a major section of an Integrity Management Manual for River Crossings for the Canadian Energy Pipeline Association,

CLIENTS

- AEC Oil and Gas (Encana)
- Alyeska Pipeline, Alaska
- ARCO Alaska
- ATCO
- BC Gas
- BP Exploration Alaska
- Canadian Energy Pipeline Association
- Chancellor Energy
- ConocoPhillips
- Enbridge (Canada, U.S., Bolivia)
- Esso Resources (Imperial Oil)
- Exxon
- Fluor Daniel
- Foothills (Yukon)
- Fortis BC Woodfibre
- GasAtacama, Argentina
- GasPacifico, Chile
- Gulf Canada
- Inter Pipeline
- Imperial Oil
- Kinder Morgan (Canada)
- Michael Baker Jr., Alaska
- Northrock
- Northwest Pipeline
- Pacific Trail Pipeline
- PacRim
- Penn West
- Shell Canada
- State of Alaska
- Summit Resources
- Tanzania Petroleum
- TECHINT (Argentina, Ecuador and Peru)
- Trans Canada
- Yukon Pacific
BESIDES WORK

In 1945, the Canadian-led allies liberated my birth country, the Netherlands. More than 7,600 Canadians lost their lives. As a result of their valour and sacrifice, the suffering of the Dutch especially during the “Hunger Winter” of 1944/1945, was greatly shortened and alleviated. My parent’s concern for my health, as a one year old, was obvious from my detailed medical chart especially after having lost a 6 month old son at the beginning of the war in 1940.

Combining my passion for long distance road biking with my deep appreciation for the Canadian veterans, I rode Lake Louise to Whistler, in 2015. By the numbers:
- 7 days, 1,000 km
- total climb of 36,000 feet
- $16,000 raised for the Calgary Veterans Food Bank

Since that ride, I have been able to purchase bikes for children supported by the Calgary Military Family Resource Centre.

CONTACT
wmveldman@gmail.com
1-403-650-4758

EDUCATION
• B. Sc., Civil Engineering, 1966, University of Manitoba
• M. Sc., Water Resources, 1969, University of Manitoba

MEMBERSHIPS
• Professional Engineer, Alberta, British Columbia, Northwest Territories and Nova Scotia
• American Society of Civil Engineers

ASSOCIATION RESPONSIBILITIES
• Calgary Chairman, Canadian Society for Civil Engineering (1977 - 1979)
• Calgary Chairman, Engineering Institute of Canada (1980 -1981)
• Chairman, 8th Annual Western Regional Conference, EIC (1982)
• Board of Directors, Consulting Engineers of Alberta (1985 - 1987)
• University of Calgary - Civil Engineering Advisory Council (2002 - 2004)
• APEGA - Councillor (2004 - 2007)

AWARDS
• In 1984 Wim Veldman was awarded a Fellow in the Engineering Institute of Canada (F.E.I.C.) for “recognition of his excellence in engineering and services rendered to his profession and to society”.
• Multiple awards from the Consulting Engineers of Alberta and the Association of Consulting Engineers of Canada for innovative solutions for challenging pipeline projects in Argentina and Ecuador.

PROFESSIONAL HISTORY
• Wim M. Veldman Consulting Inc. Hydrotechnical Consultant 2012 - Present
• Matrix Solutions Inc. Vice President 2005 to 2012
• Hydroconsult President / Chief Engineer 1992 to 2005*
• Hardy BBT Ltd Manager 1987 to 1992
• Hydrocon Engineering President / Chief Engineer 1979 to 1987
• Northwest Hydraulic Consultants Principal 1973 to 1979
• Manitoba Hydro / Crippen Acres Hydraulic Engineer 1966 to 1973 /Province of Manitoba

PUBLICATIONS AND MAJOR PRESENTATIONS

* Matrix purchased Hydroconsult in 2005
June 13, 2017

NATIONAL ENERGY BOARD MODERNIZATION
EXPERT PANEL
REVIEW OF MAY 15, 2017 REPORT

Thirty (30) independent pipeline professionals representing 1,055 years of experience in the design, approval, construction and operation of pipelines in Canada, U.S. and internationally provide our comments to the Expert Panel’s Report to modernize the National Energy Board (NEB).

REVIEW

We believe that rather than fulfilling your mandate “... to position the NEB as a modern, efficient and effective regulator and regain public trust”, your recommendations will have the exact opposite effect. Our reasons for this harsh assessment are:

- as you indicated “...the NEB is respected internationally...” and you“...heard that benchmarking has placed Canada among the most stringent of regulatory regimes.” (Page 16),

- the NEB has exclusive responsibility for regulating pipelines under federal jurisdiction. Compare that to the U.S. where three separate agencies namely FERC, the EPA and PHMSA have roles in various stages of a pipeline’s life.

- the NEB is already “modernizing” – compare the number of and details of conditions for the Mackenzie Gas Project (2004), Northern Gateway (2013) and TransMountain Expansion (TMX) (2016). A federal audit of the NEB in 2015 indicated the need for it to improve post approval tracking of its conditions – following which the NEB’s conditions for TMX stipulated a robust tracking system. You acknowledge that the NEB has adapted in many areas (Page 16).

- efficiency and effectiveness will dramatically decrease if part of the NEB is relocated to Ottawa, remote from most of the subject matter experts, pipelines, and operators subject to its oversight.

- a one year upfront review to “determine alignment with national interest by the Governor in Council before detailed review...” will certainly not improve efficiency. Reviews could be halted, delayed or altered pre- and post elections.

- increased political decisions upfront will diminish, not regain, public trust. “Participants told us that in many cases they did not object to the outcome of a decision, so much as the opaque process by which it was achieved. This is especially the case for the decisions rendered by Cabinet where decisions are protected by Cabinet confidence...” (Page 13).
• if a project is approved up front in the “national interest”, logic would conclude that public trust in the detailed review would diminish – stakeholders would rightfully believe that the comprehensive review will have a foregone conclusion and a project proponent may also feel less need to offer its utmost for public acceptance.

• “real and substantive participation of Indigenous peoples, on their own terms...” is recommended. The method of Nation-to-Nation consultation with Indigenous People is presently unknown as it is being developed by a Working Group of Ministers under the leadership of the Minister of Justice.

• consultation is a two-way street. The NEB’s decision report for TMX outlines the refusal of certain Indigenous groups, as well as several mayors to participate in the hearing process – they have stated they will oppose TMX regardless.

• upon establishment of clear and consistent criteria for Nation-to-Nation consultation, will the Indigenous Peoples have the power to veto? If the vast majority of Indigenous groups approve a project – Northern Gateway and TMX for example – will an individual Indigenous group, in the Vancouver area for example, have the power to override the majority opinion?

• you propose radically increasing the scale and scope of stakeholder engagement to “build trust and drive better outcomes for all Canadians.” Stakeholders that could be directly impacted already have every opportunity to participate and in many cases, to receive funding. Other than perhaps nuclear power plants, pipelines already undergo greater public scrutiny and stakeholder input than any other proposed major project.

RECOMMENDATIONS

The NEB should not be dismantled as you propose but fine-tuned to further enhance its excellent performance. Our recommendations are:

• the Government clearly and publicly enunciates core National Energy Policies such as:
  – our “...prime responsibility...is to ensure international market access for our resource products” (Prime Minister’s statement on various occasions).
  – the review is “...up to a process that shouldn’t be about politics and should be about what’s right for Canadians, what’s right for our future.” (Prime Minister, September 13, 2016 news conference with the IMF).
  – Canada to become energy independent, coast to coast to coast, by 2025,

• an Expert Review Board, comprised of three recognized senior independent specialists, to review, pre the NEB decision report, major issues such as tanker traffic and adequacy of a spill response plan. Their report would be appended to the NEB decision report.

• Indigenous and Northern Affairs Canada (INAC) develops a comprehensive list of all Indigenous Peoples that could be affected and/or have a claim to the lands crossed by the pipeline. INAC would track, not consult, to ensure that all groups had been fully engaged by the proponent and/or the NEB – five to ten distinct consultation phases could be involved. The consultation matrix thus developed would be appended to the NEB decision report.
• review, establish and update clear rules for the scope and funding for directly affected stakeholders. Establishing a “right of standing” and time limits for presentations and cross-examination at hearings is common. All others, not directly impacted, can submit their views in writing.

CLOSURE

If your recommendations are adopted, and result in a dismantling of a highly respected, effective, sound and transparent regulator, it is questionable whether any future pipeline proposals would ever see the “light-of-day”. Moreover, this may set a precedent for other energy-related projects and have unintended consequences by damaging the reputation of Canada’s energy industry and reducing investment interest. The NEB process can be improved via fine tuning.

The undersigned would be pleased to meet with you at any time to discuss this further especially the recommendations.


INDEPENDENT SUPPORTERS

The following support the positions outlined herein and have provided valuable input. Wim M. Veldman however assumes full responsibility for the final submission.

Bain McMillan          John Ellwood          Rick Waraksa
Rod Read               Bruce Smith          Mike Wagner
Jim Smyth              Theo van Besouw      Tony Griffin
Jim Oswell             Moness Rizkalla      Jesse Dirom
Dave Julian            Tod Collard          Chelsey Reschke
Jason MacDonald        John Fry             Neil Thomassen
Darcy Friesen          Marc Spencer         Vaughn Inman
Neil Bowker            William Butler       Chris Butler
Rudy Nemeth            Ron Coutts           Anonymous
Rick Kerr

Wim M. Veldman Consulting Inc.