

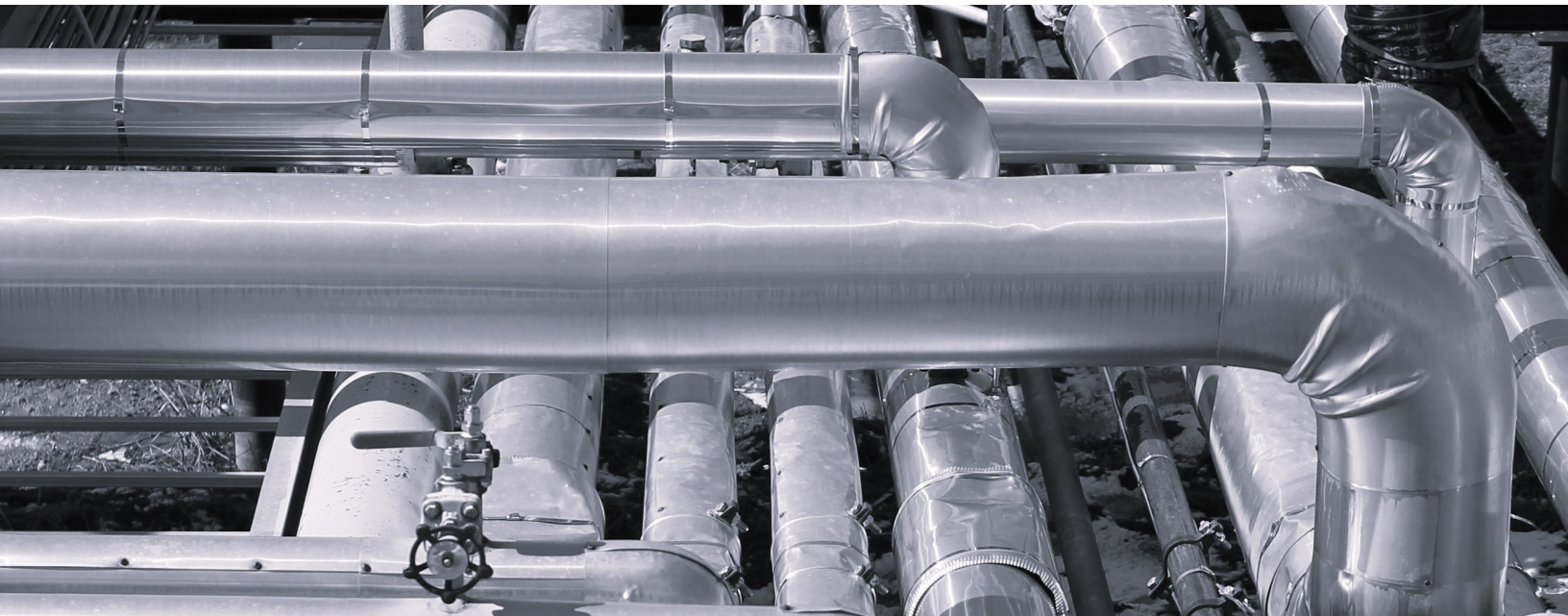
Summary of Public Engagement Results

Environmental Protection Plan

Guidelines and Interpretation Notes

October 9, 2026

Une version française de ce document est disponible.



K'áhshó got'íne xədə k'é hederí ɬedjhtl'é yerinwə nı dé dúle.
Dene Kədə

ʔerihł'ís Dēne Sųlíné yatı t'a huts'elkēr xa beyáyatı theɬə ɬat'e, nuwe ts'ēn yóftı.
Dēne Sųlíné

Edı gondı dehgháh got'je zhaté k'éé edatł'éh enahddhə nıde naxets'é edahlı.
Dene Zhaté

Jii gwandak izhii ginjik vat'atr'ijəhch'uu zhit yinothtan ji', diits'at ginohkhii.
Dinjii Zhu' Ginjik

Uvanittuaq ilitchurisukupku Inuvialuktun, ququaqluta.
Inuvialuktun

ᑕᑦᑲᑦ ᑎᑎᑦᑲᑦ ᐱᑦᐱᑦ ᐃᑦᑎᑦ ᐱᑦᑎᑦ, ᐃᑦᑎᑦ ᐃᑦᑎᑦ.
Inuktitut

Hapkua titiqqat pijumagupkit Inuinnaqtun, uvaptinnut hivajarlutit.
Inuinnaqtun

kīspin ki nitawihłtīn ē nīhīyawihk ōma ācimōwin, tipwāsinān.
nēhīyawēwin

Tłıchq yatı k'èè. Dı wegodı newq dè, gots'o gonede.
Tłıchq

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**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Contents

Introduction	1
Comments and Responses	1
General Comments	1
Section 1: Introduction	2
Section 2: Purpose and Scope of an Environmental Protection Plan	3
Section 3: Minimizing Regulatory Duplication	4
Section 4: Required Contents of an Environmental Protection Plan.....	4
Section 4.1: Overall contents	4
Section 4.2: Management system references	6
Section 4.3: Identifying hazards and risks	6
Section 4.4: Infrastructure critical to environmental protection.....	7
Section 4.5: Organizational structure and contacts	7
Section 4.6: Chemical substances	7
Section 4.7: Waste materials.....	8
Section 4.8: Discharges into the environment	8
Section 4.9: Compliance monitoring and performance measurement.....	8
Section 4.10: Records related to environmental protection	9
Section 5: Submitting an Environmental Protection Plan	10
Section 6: Maintaining and Updating an Environmental Protection Plan	10
Conclusion	11

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Introduction

The Office of the Regulator of Oil and Gas Operations (OROGO) made the draft revised *Environmental Protection Plan Guidelines and Interpretation Notes* (Guidelines) available for public engagement on March 13, 2026. Specific invitations to review the Guidelines and provide comments were issued to:

- Indigenous governments.
- Companies holding Operating Licences in OROGO's jurisdiction and the Canadian Association of Petroleum Producers.
- Other regulators OROGO interacts with because of existing Land Claim Agreements and Memoranda of Understanding.
- Federal and territorial departments and agencies.
- Selected environmental non-government organizations with an NWT presence.
- The Standing Committee on Economic Development and the Environment.

The deadline for comments was May 4, 2026. Feedback was provided by:

- Alternatives North.
- The Standing Committee on Economic Development and the Environment.

This document summarizes the comments received during the public engagement period and OROGO's response.

Comments and Responses

This section begins with general comments received on the draft Guidelines, followed by comments received on specific sections of the draft Guidelines.

General Comments

The following table contains the general comments received about the draft Guidelines and OROGO's responses.

Comments	Responses
We ask that OROGO conduct future opportunities for public comment using the Online Review System (ORS) at https://new.onlinereviewssystem.ca/ . Although there is a separate page for OROGO reviews on this website, this specific review does not appear there. We would appreciate an explanation as to which OROGO public reviews are posted on the ORS and why this specific review is not found there.	OROGO was added to the Online Review System (ORS) in April 2026, after the draft Guidelines were issued for public engagement, therefore they were not posted on the ORS for feedback. OROGO is currently exploring how best to use the ORS to enhance public engagement on policy documents.
We do not support the OROGO approach to these Guidelines where an operator sets out plans that are totally voluntary with no public reporting requirements.	Environmental Protection Plans (EPPs) are a required part of applications for Authorization under the <i>Oil and Gas Drilling and Production Regulations</i> (OGDPR). EPPs are available on OROGO's Public Registry as part of the Authorization application package. Section 86 of the OGDPR establishes mandatory annual environmental reporting for production operations and drilling operations.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Comments	Responses
A quick search of the OROGO website revealed no posting of any EPPs or indeed anything with the keyword 'Plan'. The Guidelines do not require or make provision for any form of public review or comments on EPPs or updates. This is not consistent with the generally accepted practices of the co-management bodies across the NWT. We urge OROGO to adopt this best practice.	EPPs are available on OROGO's Public Registry as part of the authorization application package, along with Safety Plans, Contingency Plans, proposed programs, and other documentation. All interested organizations and individuals are welcome to provide feedback to OROGO on items posted on the Public Registry. However, OROGO recognizes most users are more familiar with the ORS process. OROGO is currently exploring how best to use the ORS to enhance public engagement on applications while avoiding duplication and potential confusion with the associated applications for Land Use Permits and Water Licences.
In the interest of transparency and accountability, we request a response from OROGO to our submission and comments and request copies of public postings and responses to other comments that are submitted.	This report contains all the comments received on the draft Guidelines through the public engagement process and OROGO's responses.
It is not clear how the EPP may relate to or will be coordinated with proof of financial responsibility and the assessment of risk or potential impacts of an operation. This relationship should be clearly spelled out in the Guidelines. Proof of financial responsibility should also include consideration of compliance with all approved EPPs and their related monitoring and public reporting provisions and costs.	The Regulator's decision on the amount of proof of financial responsibility required for a proposed operation is based on the worst-case scenario for a possible spill. The worst-case scenario should be consistent with the information provided in the EPP and the Contingency Plan, but the contents of the EPP and the Contingency Plan do not inform the amount of proof of financial responsibility required for the proposed operation. OROGO is in the early stages of reviewing the <i>Proof of Financial Responsibility Guidelines and Interpretation Notes</i> and will consider incorporating requirements associated with EPP compliance as the revised draft is developed.

Section 1: Introduction

The following table contains the comments received about section 1 of the draft Guidelines and OROGO's responses.

Comments	Responses
Does OROGO intend to develop or issue a separate guideline, document, or publication to address "awareness" requirements?	Section 5(1) of the OGDPR requires applicants for Authorizations to develop a management system. Section 5(2) identifies the required contents of a management system, including processes for ensuring personnel are trained and competent in their duties. OROGO is considering the development of guidelines for management system requirements.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Comments	Responses
Has OROGO considered collaborating with the Government of the Northwest Territories to amend section 9 of the OGDPR to include awareness, competency, and training requirements, thereby allowing these elements to be reintroduced within EPPs?	The Department of Industry, Tourism and Investment (ITI-GNWT) is the administering department for the <i>Oil and Gas Operations Act</i> (OGOA) and its regulations. Should ITI-GNWT choose to advance changes to the OGDPR, OROGO would contribute to that process as invited. However, at this time, requirements for awareness, competency, and training relate to management systems rather than EPPs.
[Table 1] would be much more helpful if there was a third column that clearly stated the reasons or rationale for the changes. Some of this is mixed in with the changes covered in the first and second columns, but a third column with the rationale should be incorporated.	A third column headed “rationale” has been added to Table 1.
If these guidelines are subject to discretion by the Regulator as to whether they will be applied or not, the Regulator should provide public notice and reasons for decision as to why the guidelines are not to be applied to any individual case or class of cases.	If the Regulator approves an exemption from a guideline requirement, it is documented, with reasons, in the Regulator’s letter of decision for the Authorization and posted on OROGO’s Public Registry.

Section 2: Purpose and Scope of an Environmental Protection Plan

The following table contains the comments received about section 2 of the draft Guidelines and OROGO’s responses.

Comments	Responses
The two current bullets do not reflect any public purpose for the EPPs. Clearly EPPs are required to build public confidence that oil and gas operations are conducted safely and the environment is protected. These purposes should be added to this section.	OROGO recognizes EPPs may serve many other purposes for stakeholders. However, the Guidelines are directed toward applicants and operators and reflect the uses of EPPs under OGOA by OROGO.
It should be clearly stated that the applicant has the responsibility to ensure compliance with the EPP. A bullet requiring public reporting of any non-compliance and management responses should be added.	Section 4.2 of the draft Guidelines (Management system references) states “The operator must ensure compliance with the management system, including with those aspects reflected in the Environmental Protection Plan”. The terms and conditions of Authorizations require the operator to comply with all parts of the application package, including the EPP. OROGO ensures compliance with the EPP through its compliance and enforcement program. Non-compliance may be identified through inspections, annual environmental reports, and incidents, all of which are documented on OROGO’s Public Registry. Non-compliance may be addressed through Notice of Non-Compliance and other enforcement actions, which are also documented on OROGO’s Public Registry.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Comments	Responses
There should be a section that requires an EPP to reflect the environment in which it will operate including any significant species or special ecosystem attributes that may be impacted (e.g., karst topography, springs, wetlands).	Please see the response to comments on Section 4.3: Identifying hazards and risks.

Section 3: Minimizing Regulatory Duplication

The following table contains the comments received about section 3 of the draft Guidelines and OROGO's responses.

Comments	Responses
The current wording actually requires duplication. The Guidelines should allow some flexibility to allow plans submitted to the Lands and Water Boards to substitute for an EPP, and that the Regulator will make that determination public with reasons.	A review of the filing requirements of the Land and Water Boards of the Mackenzie Valley demonstrated there is no requirement to submit an EPP to obtain a Water Licence or Land Use Permit, although oil and gas companies frequently choose to do so. This section has been removed from the Guidelines and replaced with wording under "Overall Contents" and "Maintaining and Updating an Environmental Protection Plan" which reflects OROGO's objectives of reducing potential miscommunication.

Section 4: Required Contents of an Environmental Protection Plan

The following sections contain the comments received about section 4 of the draft Guidelines and OROGO's responses.

Section 4.1: Overall contents

The following table contains the comments received about section 4.1 of the draft Guidelines and OROGO's responses.

Comments	Responses
It is not clear whether any of the codes or standards that may be used by an applicant are subjected to any sort of independent verification or audit. It is also not clear why OROGO would simply accept any codes or standards without exercising any discretion as to their applicability or acceptability. If codes or standards are proposed by an applicant, the onus should rest with the applicant to prove their applicability and acceptability. OROGO should rule on their applicability and acceptability in any individual circumstances and provide public reasons for decision.	Most codes and standards used in EPP development are managed by either independent standards organizations (for example, the International Standards Organization or the Canadian Standards Association) or by other regulators working with industry bodies (for example, Energy Safety Canada). OROGO reviews EPPs submitted by applicants as part of the application for an Authorization. If OROGO found an EPP relied on an inappropriate code or standard, Information Requests would be issued to request changes to the EPP before it was approved. Information Requests and responses are posted on OROGO's Public Registry.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Comments	Responses
Although consistency with GNWT legislation and requirements of EPPs as discussed in the section, the <i>Environmental Protection Act</i> has not been reviewed or updated in many years, and air quality is very poorly covered in legislation and regulation. There should be an explicit requirement in the Guidelines for monitoring and minimizing methane, other greenhouse gases (GHGs), and particulate emissions. Where an applicant intends to carry out flaring or incineration, there must be details on how and when this will be done, how emissions will be controlled, monitored and publicly reported.	The intent of this section is to ensure EPPs comply, at minimum, with existing legislative requirements to avoid conflict with other regulatory decisions. Methane emissions, GHGs, and particulate emissions are considered in the waste management discharge into the environment sections of EPPs. Flaring, venting, and burning of oil or gas are addressed in sections 67 and 68 of the OGDPR. If an applicant anticipates these activities as part of the proposed operations, they must be declared in the program submitted with the application and must be specifically approved by the Regulator in the terms and conditions of the Authorization, including maximum daily limits. Application packages and Authorizations are available on OROGO's Public Registry. For well interventions (suspensions, abandonments, etc.), amounts of oil or gas flared, burned, or vented are captured in the daily operations reports (submitted to OROGO under section 83 of the OGDPR), which are made public as part of the Well Operations Report (required under section 89 of the OGDPR) on OROGO's Public Registry. Any flaring, venting, or burning of oil or gas above the pre-approved limits is considered an incident and must be reported to OROGO as such. Incident summary reports are available on OROGO's Public Registry.
There should be discussion in the EPP as to how it relates to GNWT's Climate Change Strategic Framework, including international commitments to reduce greenhouse gas emissions.	As noted above, the intent of this section is to ensure EPPs comply, at minimum, with existing legislative requirements to avoid conflict with other regulatory decisions. The GNWT may comment on proposed oil and gas operations and raise considerations associated with the Climate Change Strategic Framework through OROGO's review process and through the review processes of other regulators.
Since the <i>Waters Act</i> is also well out of date, an applicant submitting an EPP should also demonstrate how they will minimize water use, maintain water quality and quantity, and take the increasingly large variations in water levels and rainfall events into account in their EPP.	The quantity of water used during operations is regulated by the Land and Water Boards of the Mackenzie Valley through the Water Licence process, as are impacts on water quality due to operations. The impacts of variations in water levels and rainfall events would be addressed through the hazard and risk identification component of EPP development (for example, potential site flooding) and the proposed program for operations (for example, timing and logistics related to river crossings).

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Comments	Responses
The proposed wording where an applicant does not have to provide supporting documents is counterintuitive to openness and transparency. In addition, this lack of supporting documents may hinder opportunities for others to comment or review such information for its applicability or acceptability. We recommend changing the current approach to require submission of supporting documents.	Historically, EPPs received by OROGO refer to supporting documents that are publicly available (for example, legislation or Land and Water Board guidance documents) or management system documentation. OROGO's practice is to request the submission of management system documentation related to the EPP, Safety Plan, and Contingency Plan for review. These documents are placed on the Public Registry. Requiring applicants to submit all documents referred to in the EPP could result in very large files that are difficult for users of the Public Registry to download.

Section 4.2: Management system references

The following table contains the comments received about section 4.2 of the draft Guidelines and OROGO's responses.

Comments	Responses
There are no requirements in this section or elsewhere, that require any form of public reporting in relation to the performance of the management system. At a minimum, there should be a requirement for a final report at the end of an operation on the performance of their management system and mandatory public non-compliance reporting. For operations of longer than one season in duration, annual public reporting should be required.	Some aspects of management systems are reported on in the annual environmental reports and safety reports required in sections 86 and 87 of the OGDPR. However, the OGDPR does not require regular reporting on other aspects of the management system. OROGO is considering the development of guidelines for management system requirements.

Section 4.3: Identifying hazards and risks

The following table contains the comments received about section 4.3 of the draft Guidelines and OROGO's responses.

Comments	Responses
There should be a section that requires an EPP to reflect the environment in which it will operate including any significant species or special ecosystem attributes that may be impacted (e.g., karst topography, springs, wetlands).	Most operators already identify significant species and special ecosystem attributes in their EPPs. Wording related to ensuring hazard and risk identification studies reflect the physical context of the proposed operations has been added to this section.
OROGO apparently accepts the as low as reasonably practicable (ALARP) approach. It is unclear whether the public would accept ALARP if there is significant risk or concern or better technology available at a cost not considered economic by an operator. Alternatives North would prefer reference to the Precautionary Principle, given the remoteness and fragility of most of our landscapes and ecosystems. The public should have an opportunity to review and comments on any proposed use of ALARP by an applicant and OROGO.	EPPs, including any documentation on the use of ALARP by the applicant, are available for review on OROGO's Public Registry as part of an application for Authorization. OROGO does not interpret ALARP as limited to technologies or processes considered economic by the operator. Practicable means "capable of being put into practice or of being done or accomplished" (Merriam-Webster online dictionary). What is practicable is not limited by what the operator considers economic.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Section 4.4: Infrastructure critical to environmental protection

The following table contains the comments received about section 4.4 of the draft Guidelines and OROGO's responses.

Comments	Responses
Canadian Association of Energy Contractors (CAOEC) has recommended practices but it is unclear whether these have been subjected to any independent reviews or audits. It is also not clear whether OROGO has conducted its own review of these recommended practices for their applicability and acceptability in the NWT. If such reviews have been conducted by OROGO, we would like to see them.	The CAOEC's recommended practices are developed and maintained by its Engineering and Technical Committee, made up of engineers and technical operations professionals who are members of CAOEC. The recommended practices describe the inspection and certification requirements for drilling and service rig equipment, based on the expertise of equipment owners. Recommended practices are updated at least once every five years. The review process involves CAOEC members, third-party engineers, Original Equipment Manufacturers and their agents. The Alberta Energy Regulator has also contributed to five-year reviews in the past. OROGO's use of CAOEC recommended practices is consistent with other energy regulators in western Canada. OROGO has not conducted independent reviews of these practices and does not have the capacity to do so. In this area, OROGO relies on technical advice from the Alberta Energy Regulator under its Service Agreement.

Section 4.5: Organizational structure and contacts

There were no comments about section 4.5 of the draft Guidelines.

Section 4.6: Chemical substances

The following table contains the comments received about section 4.6 of the draft Guidelines and OROGO's responses.

Comments	Responses
There does not appear to be any requirement for full public disclosure of the chemical make-up of all drilling fluids and what may be considered proprietary substances used during operations. We recommend this be added to this section.	The definition of chemical substances in the draft Guidelines includes drilling fluids and process chemicals. The EPP must include a list of all chemical substances that will be used, stored, handled, or disposed of during the activity. EPPs are made public on OROGO's Public Registry. Under section 22(2) of OGOA, all information provided to the Regulator for the purposes of the Act is public, unless the Regulator deems it confidential because it meets the criteria described in the Act. For more information on these criteria and the process involved, please consult the <i>Public Access to Information Guidelines and Interpretation Notes</i>.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Section 4.7: Waste materials

There were no comments about section 4.7 of the draft Guidelines.

Section 4.8: Discharges into the environment

The following table contains the comments received about section 4.8 of the draft Guidelines and OROGO's responses.

Comments	Responses
There is nothing in this section that requires any sort of public reporting of discharges into the environment. At a minimum, there should be a requirement for a discussion on how incidents and near-misses are to be communicated to the public at the time of, or as close as practicable, to the incident, and for a final public report that fully discloses all discharges (chemical substances, quantities, locations, any mitigation measures undertaken). For operations of longer than one season in duration, annual public reporting of discharge should be required.	OROGO distinguishes between pre-approved discharges and discharges due to an incident. Pre-approved discharges are documented in the application package and the terms and conditions of the approved Authorization. These are available on OROGO's Public Registry. Discharges due to an incident are reported to OROGO under section 75 of the OGDPR and to the NT/NU Spill Line. Incident summary reports are available on OROGO's Public Registry. The NT/NU Spills Database is available through the Department of Environment and Climate Change (GNWT). For production facilities, which are the operations most likely to last more than one season, section 86 of the OGDPR requires an annual environmental report that must include a summary of discharges and waste material produced. These reports are posted on OROGO's Public Registry. In 2026-2027, OROGO is planning updates to the <i>Contingency Plan Guidelines and Interpretation Notes</i>, including a more detailed description of incident reporting requirements.

Section 4.9: Compliance monitoring and performance measurement

The following table contains the comments received about section 4.9 of the draft Guidelines and OROGO's responses.

Comments	Responses
There is nothing in this section about mandatory reporting to OROGO of any non-compliance or any management responses. Such reporting should be a requirement and be made public.	Under section 75 of the OGDPR, all incidents must be reported to OROGO as soon as circumstances permit. Incident summary reports are available on OROGO's Public Registry. Incidents include pollution and any event that causes "the impairment of any structure, facility, equipment or system critical to environmental protection" (section 1, OGDPR).

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Comments	Responses
	For production facilities, section 86(1) of the OGDPR requires an annual environmental report that must include a summary of incidents. These reports are posted on OROGO's Public Registry. For drilling operations, section 86(2) of the OGDPR requires an environmental report within 90 days of rig release that must include a summary of incidents. These reports are posted on OROGO's Public Registry. In 2026-2027, OROGO is planning updates to the <i>Contingency Plan Guidelines and Interpretation Notes</i>, including a more detailed description of incident reporting requirements.

Section 4.10: Records related to environmental protection

The following table contains the comments received about section 4.10 of the draft Guidelines and OROGO's responses.

Comments	Responses
There is nothing in this section about filing any of this information with OROGO for public accountability. We recommend an annual operations report that would cover or summarize [note that these bulleted items are taken directly from other provisions on this page]: - Records the operator maintained to demonstrate compliance with the EPP; - Describe the process for reviewing and updating the EPP; - Processes for communicating updates to the EPP to employees, contractors, and service providers; - Emergency drills and exercises; - Incidents and near-misses; - Daily maintenance and operating activities critical to environmental protection; - The status of equipment and systems critical to environmental protection; and - Any other matter as directed by OROGO.	For production facilities, operators must: - Maintain records that include records of maintenance of systems critical to environmental protection (section 77 of the OGDPR). - Submit an annual environmental report that addresses most of the listed items (section 86(1) of the OGDPR). These reports are posted on OROGO's Public Registry. For drilling operations, operators must submit an environmental report within 90 days of rig release that includes many of the items listed in the comment (section 86(2) of the OGDPR). These reports are posted on OROGO's Public Registry. For well interventions (suspensions, abandonments, etc.), daily maintenance activities are captured the daily operations reports (submitted to OROGO under section 83 of the OGDPR), which are made public as part of the Well Operations Report (required under section 89 of the OGDPR) on the Public Registry. Under section 75 of the OGDPR, all incidents must be reported to OROGO as soon as circumstances permit. Incident summary reports are available on OROGO's Public Registry. OROGO has recently begun documenting its observation of emergency drills and exercises on the Public Registry.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Section 5: Submitting an Environmental Protection Plan

The following table contains the comments received about section 5 of the draft Guidelines and OROGO's responses.

Comments	Responses
There is nothing in this section about OROGO intentions for any kind of public review or opportunity for public comment on what is submitted as an EPP. This is not consistent with the generally accepted practices of the co-management bodies across the NWT. We urge OROGO to adopt this best practice.	EPPs are available on OROGO's Public Registry as part of the Authorization application package. OROGO is currently exploring how best to use the ORS to enhance public engagement on applications while avoiding duplication and potential confusion with the associated applications for Land Use Permits and Water Licences.

Section 6: Maintaining and Updating an Environmental Protection Plan

The following table contains the comments received about section 6 of the draft Guidelines and OROGO's responses.

Comments	Responses
Can OROGO inspections, enforcement actions, or incident investigations compel an operator to update an EPP? Specifically, does OROGO have the authority to require updates where the operator has not proposed revisions?	The Regulator or the Chief Conservation Officer, depending on the circumstances, can require updates to an EPP based on inspections or enforcement actions, or because of a change in proposed operations or the context of the operation.
What criteria or guidance does OROGO provide to operators to determine when an EPP should be amended based on the results of the annual review process?	Wording has been added to inform operators that the EPP must be updated if the annual review identifies any changes to operations that affect the required contents described in the Guidelines or the approved Development Plan (in the case of a production operation).
It is not clear what, if any, role there may be for the public in reviewing any updates. We recommend that the public be given an opportunity to review and comment on significant changes to any EPP. There is no clear statement or commitment that OROGO will make draft or approved EPPs public through its public registry. Given our position that OROGO should provide an opportunity for public comment on draft EPPs, OROGO should clearly state that approved EPPs are public documents and will be posted without delay to its Public Registry.	EPPs are available on OROGO's Public Registry as part of the Authorization application package. Application packages, including EPPs, are posted to the Public Registry within five business days of being deemed complete, in accordance with the <i>Public Access to Information Guidelines and Information Notes</i> . Any changes to EPPs made because of Information Requests issued by OROGO or by the operator to reflect changes in its operation are also posted on the Public Registry. OROGO is currently exploring how best to use the ORS to enhance public engagement on applications while avoiding duplication and potential confusion with the associated applications for Land Use Permits and Water Licences.

**Summary of Public Engagement Results:
Environmental Protection Plan Guidelines and Interpretation Notes**

Comments	Responses
If an operator updates an EPP following an annual review to satisfy OROGO's requirements, is the operator also required to submit the revised EPP to the Land and Water Board? If so, is this requirement established elsewhere, or does OROGO anticipate providing additional guidance to clarify this obligation?	OROGO cannot require an operator to submit a document to another regulator.
Is it possible for multiple regulators to request different or potentially conflicting changes to an EPP? If so, how are such inconsistencies coordinated or resolved?	If the original EPP is submitted to and approved by both OROGO and other regulators, and changes reflect changes in the operation or the context, conflicts are unlikely. OROGO has robust working relationships with the staff of other NWT regulators and with the GNWT Inspectors. Therefore, if there is a potential conflict, OROGO anticipates engaging to coordinate and resolve it. This process is already used to address other areas of regulatory overlap.

Conclusion

OROGO thanks the organizations and individuals who took time to review and comment on the draft Guidelines. The Guidelines have been amended to reflect the comments received where possible, while maintaining the integrity of the Guidelines with respect to their objectives.