

I hope this finds you well. I apologize for sending these short reflections to you. Your email address was included in the below and I went with it. Please feel free to forward this as necessary.

IRC has taken a look at the discussion papers and I took part in a call on the subject a couple of weeks ago. We are generally comfortable with the concepts behind the regulations that are being proposed; but, do have a couple of comments to share.

First, as the Inuvialuit Settlement is in a unique situation where the NEB continues to be the regulator (performing functions that would otherwise be performed by a territorial or provincial regulator) until 2034, we feel it is important to address in the regulations where a designated officer may perform those functions that would not otherwise be federally regulated.

Second, IRC would underscore the the need to provide notice to Indigenous rights holders where an operation is to take place within a settlement region and/or on private lands. While we appreciate that the same rules regarding constitutionally protected rights would apply to designated officers, notice allows rights holders to assess for themselves what their interest level is in a particular authorization or plan amendment when it is in their region. In case it is helpful, IRC did participate with respect to proposed amendments to technical regulations under the CPRA. I would encourage your team to review those submissions for guidance.

We welcome the opportunity to engage on other regulations; so, please do keep us looped in.

Best wishes,

Kate

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