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File Ad-GA-ActsLeg-Fed-NEBA-Amend 0101

via e-mail at PartVIConsultation@neb-one.gc.ca and
Suchaet.Bhardwaj@neb-one.gc.ca

September 27, 2013

Part VI Export and Import Consultations
Attention: Suchaet Bhardwaj
National Energy board
444 Seventh Avenue SW
Calgary, Alberta, T2P 0X8

Dear Sir / Madam:

Re: Proposed changes to the National Energy Board Export and Import Regulatory Framework

On 29 August, 2013, the National Energy Board (NEB or Board) requested comments to its proposed amendments to the NEB Export and Import Regulatory Framework and to the Toll Information Regulations.

The Chemistry Industry Association of Canada¹ (CIAC) is the voice of Canada's industrial chemical industry, underpinning the broader \$47 billion chemistry industry and its 85,000 employees. CIAC members produce basic chemical and synthetic resins in all regions of the country with the largest concentrations in Ontario (41%), Alberta (37%) and Quebec (12%). Two-thirds of production is exported to over 160 countries around the world, reinforcing our need to be globally competitive.

Our member companies consume significant amounts of energy products derived from crude oil and natural gas as fuel and feedstock and as such, CIAC is an interested party to the proposed amendments and respectfully submits the following comments regarding the proposed changes.

For this matter our focus is to ensure that there is sufficient information in reporting on the production and export of oil and gas products, specifically related to Liquefied Natural Gas (LNG) exports, which would allow interested domestic parties to make better informed business decisions. In addition, having this reporting requirement would enhance the NEB

¹ www.canadianchemistry.ca



regulatory function and allow for even more informed public policy making now and into the future.

While we acknowledge that the NEB requires the average heating value of the exported gas to be reported, this is incomplete information. A small change to require reporting of the liquids entrained in the gas exported would be extremely helpful in assuring the continued growth of our industry in Canada. It is CIAC's understanding that the data elements required to provide the information pursuant to our requested change are the same data elements as currently gathered in order to calculate and report the heating value of the natural gas volumes exported, and therefore this request does not appear to be an extraneous or expensive requirement to introduce.

We believe that the overall amount of export projects that proceed is clearly up to the market and regulators to decide; we are simply requesting sufficient information about what is exported.

Comment # 1 – Part VI (Oil and Gas) Regulations – Section 12 describes the information to be furnished by applicants for licences for exportation. CIAC proposes the following addition:

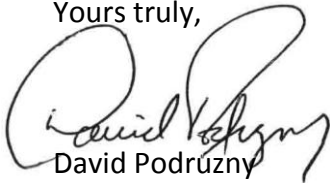
12(a)(ii) the maximum, annual and term quantities of gas to be exported, and in the case of all natural gas exports, including LNG exports, the quantities of methane, ethane, propane and butane contained in the LNG, and

Comment # 2 – Proposed Changes to the National Energy Board Export and Import Reporting Regulations – Section 4 describes the reporting requirements for exporting or importing gas. CIAC proposes the following addition:

4 (l) in the case of all natural gas exports, including LNG exports, the quantities of methane, ethane, propane and butane contained in the LNG.

CIAC appreciates this opportunity to comment and would be pleased to discuss this important issue further with you. Please contact the undersigned at (613) 237-6215 ext. 229 or DPodruzny@canadianchemistry.ca or Dan Hall at (403) 246-2699 or danhall@shaw.ca.

Yours truly,



David Podruzny
Vice-President, Business & Economics and Board Secretary
Chemistry Industry Association of Canada

cc: Mr. Serge Dupont, Deputy Minister, Natural Resources Canada