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December 31, 2018

David Post
Director of Research
Sustainability Accounting Standards Board

[Submitted online and via email]

Dear Mr. Post:

Suncor has reviewed the proposed changes to the provisional standards associated with material aspects of the integrated oil & gas sector. Our comments and suggestions are included in the table appended to this letter.

If you require any additional clarification, please do not hesitate to contact me at kfrederickson@suncor.com or (403) 296-6559.

Regards,

Kris Frederickson
Manager, Sustainability Disclosure & Stakeholder Engagement
Suncor Energy Inc.



Feedback Type	Industry Standard	Disclosure Topic	Accounting Metric Code	Line of Disclosure	Technical Agenda Item	Comment
General	Extractive & Minerals Processing Sector	GHG Emissions	Description	N/A	Sentence 3	Please consider removing the specific reference to oil sands as the only example of an unconventional resource.
Technical Protocol Proposed Updates	Extractive & Minerals Processing Sector	GHG Emissions	TA0401-01	.01	#1-2	The following statement is under both the 1 st and 2 nd bullet in this section. Please consider removing one of these. “Gross emissions are GHG emitted to the atmosphere before accounting for any GHG reduction activities, offsets, or other adjustments for activities in the reporting period that have reduced or compensated for emissions.”
Technical Protocol Proposed Updates	Extractive & Minerals Processing Sector	GHG Emissions	TA0401-01	.01	#3, 3.1	CDP has moved to sector specific reporting, despite the “normative reference” caveat, should this be updated to reflect the latest CDP version?
Technical Protocol Proposed Updates	Extractive & Minerals Processing Sector	Biodiversity Impacts	EM0101-11	.43	#1-3	Given the general guidance and the significant scope of the topic, please consider creating a standardized table/format example for each of these bullet points. Common tools used throughout disclosures include word counts, tables, and drop down menus. In the current form, this section has a high probability of creating non-comparable responses from corporations that would provide low value to investors.
Metric Level	Extractive & Minerals Processing Sector	Reserves Valuation & Capital Expenditures	EM0101-23	N/A	N/A	There appears to be an enormous assumption that 100% of all hydrocarbons will be combusted in each resource. Is this an appropriate assumption? How does this calculation adapt and/or factor technology and process improvements that reduce emission intensity over time? Is an estimate of potential CO2 disconnected from the actual business processes/technology valuable to investors?
Technical	Extractive	Reserves	EM0101-24	.151	N/A	With this question being based on OG1.6a and OG1.6b from

Protocol Proposed Updates	& Minerals Processing Sector	Valuation & Capital Expenditures				the CDP Carbon disclosure, the restructuring and reformatting of the CDP Carbon disclosure for 2018 should be reflected, as the Oil and Gas modules have been discontinued and reincorporated into other aspects of the CDP response.
Technical Protocol Proposed Updates	Extractive & Minerals Processing Sector	Reserves Valuation & Capital Expenditures	TA04-09-01	.144, .145	N/A	Identifying indicators that track a transition to a low carbon economy is a good idea. With these questions being based on OG6.2 and OG6.3 from the CDP Carbon disclosure, the restructuring and reformatting of the CDP Carbon disclosure for 2018 should be reflected, as the Oil and Gas modules have been discontinued and reincorporated into other aspects of the CDP response.
Technical Protocol Proposed Updates	Extractive & Minerals Processing Sector	Hazardous Materials Management	EM103-07	.32	N/A	With the specificity of this guidance being so heavily based around the USA EPA system, comparability will be difficult to achieve for corporations operating within other regulatory regimes with different hazardous waste definitions and protocols. Has there been any consideration for non-US hazardous waste definition equivalencies?
Technical Protocol Proposed Updates	Extractive & Minerals Processing Sector	Product Specifications & Clean Fuel Blends	EM103-13	.68, .69, .70	N/A	Comparability with other regulatory standards outside the US would be beneficial. Has there been any consideration for non-USA equivalencies/exceptions?
Metric-level	Extractive & Minerals Processing Sector	Security, Human Rights, and Rights of Indigenous Peoples	TA0404-01	.80	N/A	“Near is defined as within 5km of the recognized boundary of an area considered to be indigenous land” would most likely require significantly more guidance to create a meaningful and comparable metric, particularly around what source the recognition is coming from. Indigenous peoples themselves, corporations, industry groups, municipal governments, federal governments, NGO’s and others often have drastically different and sometimes conflicting versions of where they believe definitive boundaries should exist within the same country.
Topic-Level	Extractive & Minerals Processing Sector	TA04-06-01	Employee Health and Safety	N/A	N/A	Suncor appreciates the inclusion of metrics on management systems used to integrate cultures of safety is positive and allows companies to further share best practices.