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Engagement  
Privy Council Office  
Ottawa Ontario

Via e-mail: [engagement@pco-bcp.gc.ca](mailto:engagement@pco-bcp.gc.ca)

Re: **Engagement: Supporting timely decision making for major projects**

Dear PCO Engagement,

I am writing to you regarding the Government of Canada's **Getting Major Projects Built in Canada - Discussion Paper on Proposed Legislative, Regulatory, and Policy Reforms**, Published on May 12, 2026.

I have been engaged extensively in federal environmental, energy and climate change policy development processes for more than 30 years. I have published more than 50 refereed articles and book chapters dealing with these issues in a Canadian context. I was co-editor of [\*Sustainable Energy Transitions in Canada\*](#) (UBC Press 2023), and am currently editing the volume *Carbon Federalism: Canadian Climate Governance in a Disrupted World* for the University of Toronto Press. I have appeared as a witness before committees of the House of Commons and Senate on environment, energy and climate change issues on numerous occasions.

I have reviewed a number of submissions on the **Discussion Paper** from civil society organizations, including the [Canadian Environmental Law Association](#) and the [Wildlife Conservation Society of Canada](#). I concur with the overall direction of these submissions.

The **Discussion Paper** effectively proposes to extend the Bill C-5 model of accelerated approvals for projects deemed to be in the national interest, more broadly. The initiative would not just affect the federal impact Assessment process, itself already increasingly [subordinated](#) to provincial processes, or by-passed altogether. It would also significantly alter the wider federal regime for environmental protection, from protection of fish habitat and species at risk, to the dumping of waste in the ocean. There is also a proposal to create Federal Economic Zones, apparently based on the Ontario Ford government's [Bill 5](#) 'special economic zones,' where reviews of individual projects would be "removed,".

The basic model underlying the proposals is one of political pre-approval – projects designated as being in national interest by the cabinet would move towards regulatory approval through a streamlined 'technical'



review process, regardless what those reviews might find in terms of environmental impacts, economic and technical viability, and risks to public safety and health.

The approval of nuclear projects would effectively be politicized, moving decision-making authority from the Canadian Nuclear Safety Commission to the federal cabinet if significant concerns are identified. Such an approach would create an extremely dangerous situation when dealing with what will be [first-of-kind](#) reactors in Canada, or in some cases, [globally](#). The transfer of decision-making responsibility to cabinet could create a situation where the regulator's safety concerns could be overridden for political or economic reasons.

Aside from the environmental, climate, economic and safety implications of [short circuited](#) reviews, the [effectiveness](#) of this sort of 'streamlining' approach in achieving faster outcomes is an open question. Bill C-5 triggered intensifying political and legal [conflicts](#), particularly with Indigenous peoples over the recognition of their rights and interests within approval processes. Doubling down on such an approach seems likely to deepen these conflicts.

The tortuous and enormously [costly](#) pathway of Trans Mountain pipeline, along with many other [cases](#), highlights the potential for efforts at streamlining to backfire, into further delays and growing political and economic costs. Projects tend to run into [trouble](#) not because of regulatory requirements, but because they are poorly conceived, subject to serious doubts about their economic and technical viability, raise major safety, health and environmental concerns, or are seen to disregard the rights and interests of Indigenous peoples.

Beyond the specific of the proposals, the **Discussion Paper** sends a number of troubling messages regarding the government's overall direction on environmental and climate change matters. Specifically:

- The economic vision flowing from the **Discussion Paper** seems overwhelmingly focused on natural resources extraction and export. The places of, for example, more value-added processing and manufacturing activities, and services, beyond an enthusiasm for [AI](#), are unclear.
- The **Discussion Paper** and **Alberta MOU Implementation Agreement** carry a striking implicit concession of policy leadership on environmental, climate and economic policy matters to the provinces. This is particularly stark in relation to the [Ford government](#) in Ontario and [Smith government](#) in Alberta, as the content of the announcement and Implementation Agreement closely follow the contents of the July

2025 Alberta-Saskatchewan-Ontario [cooperation agreement](#) on pipelines, critical minerals and responsible energy development.

- The **Discussion Paper** proposals highlight again the emerging role of the [Major Projects Office](#) (MPO) as a government within a government. The initiatives contained in the **Discussion Paper** are [reported](#) to have been developed without consultations with the affected ministers, departments and agencies.
- The **Discussion Paper**, and the **Alberta MOU Implementation Agreement** are again raising questions about whether Canada has [abandoned](#) any serious commitments to action on climate change
- The **Discussion Paper** proposals can be seen as a signaling of a willingness to sacrifice wider environmental considerations in seeking investment. Such an approach could be interpreted as offering Canada as a pollution '[haven](#)' for the mining, fossil fuel and nuclear industries.

Finally, there is [alarm](#) over the implications of the government's proposals for the rights and interests of indigenous peoples, who are likely to bear the brunt of the environmental and social burdens of resource extraction.

I believe that the proposals contained in the **Discussion Paper** should be withdrawn for these reasons, and that the government reconsider its approach to major project approvals to ensure that such projects are economically and technologically viable, advance Canada's energy and economic security, reconciliation with Indigenous Peoples, the achievement of Canada's domestic and international climate change and wider environmental commitments, and protect the safety and health of Canadians.

I would be pleased to discuss any questions you may have regarding my views on this matter.

Yours sincerely,



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Professor

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