



Canadian Construction
Association
Association canadienne
de la construction

The Honourable Dominic LeBlanc
Privy Council Office (Major Projects)
85 Sparks Street
Room 1000
Ottawa, Ontario K1A 0A3

Re: Canadian Construction Association – Submission to the Getting Major Projects Built in Canada – Regulatory Changes for Major Projects

Submitted via email: engagement@pco-bcp.gc.ca

Minister LeBlanc,

The Major Projects Office (MPO) was created in response to a rapidly changing geopolitical and economic climate. For Canada to become competitive on the global stage, it must foster a business environment that attracts investment for large-scale projects. While the construction industry has continued to promote modernized and efficient best practices, the delivery of major projects, nation-building or otherwise, remains hindered by bureaucratic complexity and onerous documentation, stalling the industry's ability to build at speed and scale.

The industry appreciates the opportunity to participate in this important consultation on 'Getting Major Projects Built in Canada.' As the national voice of the construction industry, the Canadian Construction Association (CCA) represents 18,000 member firms through an integrated structure of 57 local and provincial partner associations. Our sector employs 1.6 million people, contributing approximately \$162 billion annually to the economy, and accounts for 7.5 per cent of Canada's gross domestic product (GDP).

The construction sector welcomes the government's focus and consultation on ways to cut red tape and streamline processes to get major projects built faster. While we recognize the urgency to deliver major projects and stand ready to do so, the long-term objective and strategy should be regulatory predictability rather than spotlighting specific one-off projects.

Please find our comments within this submission structured according to the key proposals outlined in the discussion paper.

Federal review and decision-making in no more than one year

The construction sector supports the proposal to ensure that "federal impact assessments and permit reviews happen at the same time instead of one after the other," specifically the government's commitment to a review and decision-making timeline of no more than one year. Not only does this approach streamline assessments and reduce the documentation burden on contractors, but concurrent processing under the 'one project decision' model means contractors are no longer burdened by incremental approvals, thereby enabling more efficient, proactive project planning and coordination.

More broadly, CCA would encourage the government to make streamlined processes the norm rather than the exception. As it stands, Canada’s current infrastructure approach remains fragmented, with regulatory and governance frameworks often designed around individual projects rather than long-term delivery objectives. While the proposed approach is a positive step, continuing to introduce isolated exemptions may perpetuate the same fundamental pattern: overreliance on one-off exemptions without structural regulatory reform may continue driving construction and the economy into unsustainable boom-and-bust cycles.

Enable economic zones through regional impact assessment

The proposal to establish federal special economic zones to eliminate duplicative project reviews through simplified permitting processes is a constructive approach that can help reduce investor risk. We also acknowledge the government’s recognition that coordination between provincial governments will be required to fast-track projects under both jurisdictions. In this context, greater clarity is needed on how this would be operationalized at all levels of government, especially when navigating or resolving interjurisdictional overlaps or addressing the regional implications of cumulative impact assessments.

Ensuring projects are technically and economically feasible

One of the government’s key proposals to streamline processes to improve the efficiency of the regulatory environment is to “ensure project requirements are technically and economically feasible; to avoid inflating construction costs and the time it takes to build a project.” CCA welcomes further detail on how this proposal will be implemented in practice.

We have been strong proponents of procurement modernization as a key lever to ensure projects are technically and financially feasible. Long-standing practices, such as awarding contracts to the lowest bidder or pursuing public-private partnerships (P3S), can entrench inefficiencies and limit innovation. To address this, the government should adopt a collaborative, agile approach to public procurement to align incentives and accelerate the delivery of major projects.

Economic feasibility must also be considered in the context of procurement restrictions. For example, while CCA recognizes the importance of supporting domestic industries through ‘*Buy Canadian*’ policies, Canada does not currently produce all materials required for major construction projects. As a result, these protectionist procurement policies and their expansion into provincial procurement, introduce unintended consequences, including increased costs, additional compliance burdens, and elevated risks for contractors. This self-imposed red tape can disrupt the predictability of timelines and budgets, undermining the government’s intentions of accelerating project delivery.

Allowing early construction activities to start

CCA supports the proposal to authorize early construction activity prior to an impact decision, provided all necessary permits have been approved. It acknowledges the reality that the stop-start nature of approvals and permitting can significantly delay project delivery. However, it is equally important to be mindful of related bottlenecks that prevent construction from proceeding, despite granted approvals, such as delays in utility connections or locates.



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Related to this, CCA has previously raised concerns regarding the security clearance process in federal construction procurement. The current system is misaligned with the government's commitment to fast-tracking major projects and reducing red tape. Phase one and two changes have effectively tied clearance initiation to procurement timelines rather than to market readiness, making it more difficult for contractors to mobilize their workforces and secure advanced employee clearances. The restriction on clearance being issued after the project is awarded remains a persistent bottleneck that directly undermines the industry's ability to build at speed and scale, jeopardizing the tranche of major projects. As the government explores regulatory and legislative changes to accelerate project delivery, this effort should also recognize the unique nature of construction procurement and warrant a reassessment of the security clearance process to facilitate more efficient project execution.

National Infrastructure Strategy

The construction industry is cognizant of the geopolitical volatility Canada faces; however, the absence of a national infrastructure strategy remains a significant gap in cohesive long-term infrastructure planning. While the MPO has designated itself as a temporary office to streamline and review projects within one to two years, the tranche structure reinforces the existing piecemeal pattern of infrastructure investment. While the industry is proud to deliver the 'Build, Baby, Build' agenda, we would be remiss not to note that reliance on one-off projects, while economically convenient, does a disservice to system-wide coordination, continuity, and integration with other infrastructure initiatives, ultimately diminishing the full value of the government's investment.

Conclusion

On behalf of CCA and our membership, we appreciate the opportunity to participate in this consultation on 'Getting Major Projects Built in Canada – Regulatory Changes for Major Projects.' The construction industry is clear: building major projects requires a simpler, more coordinated process. However, meaningful reform goes beyond simple regulatory changes; it must create a transparent and fair business environment grounded in regulatory and timeline predictability, rather than ad hoc exemptions per project. With a long-term strategy and framework in place, the economic benefits of this tranche of major projects can be sustained and amplified, providing lasting value for future generations.

We welcome the opportunity to meet with you and your team at a mutually convenient time to discuss the contents of this submission further.

Warm regards,

A handwritten signature in black ink, appearing to read 'Rodrigue Gilbert'.

Rodrigue Gilbert
President, Canadian Construction Association