

First Look at the Building Canada Strong Act (Bill C-39)

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On September 21, 2026, the federal government introduced [Bill C-39](#), also known as the Building Canada Strong Act. This legislation would amend several existing pieces of legislation to significantly reform the federal regulatory and approval process for major projects. The proposed changes are aimed at accelerating project approvals, reducing duplication between regulatory processes, and improving coordination with respect to Indigenous consultations. These proposed amendments coincide with key aspects of the 2025 [Canada-Alberta Memorandum of Understanding](#) (the "MOU"), and its focus on accelerating approvals, reducing regulatory overlap and increasing certainty for major energy and infrastructure projects. Bill C-39 is intended to support these objectives by providing a more streamlined and predictable regulatory process for project proponents and investors while maintaining existing assessment and consultation requirements.

This article provides a high-level overview of Bill C-39, focusing on its key proposed legislative reforms and the practical implications of those changes.

Key Takeaways

If enacted as currently drafted, Bill C-39 would:

- Establish a one-year timeline for federal decisions after applications have been submitted;
- Streamline Indigenous consultation by moving toward a single consultation process for each project and Indigenous community;
- Create "regions of national interest" to reduce procedural requirements for approvals of specified projects in those regions;
- Implement transportation-related reforms to strengthen national supply chains and improve trade infrastructure; and
- Introduce labour relations reforms to reduce disruptions to critical infrastructure and supply chains.

One-Year Timeline for Federal Decisions

A central feature of Bill C-39 is that it would establish a one-year timeline for federal reviews and decisions on major project applications. Bill C-39 would amend the preambles to the [Impact Assessment Act](#) (the "IAA") and the [Canada Energy Regulator Act](#) (the "CER Act") to state that the Government of Canada is committed to ensuring decisions would be issued within one year after the proponent provides the required information or studies.¹ Under the proposed framework, the review period would begin after a project proponent has submitted a complete

¹ Bill C-39, *An Act Respecting Certain Measures to Strengthen the Economy*, 1st Sess, 45th Parl, 2026 [Bill C-39], Part 1, [cls. 2](#) and [118](#).

application, including all required supporting studies and information. Once that application is submitted, the federal government would typically have a maximum of one year to conduct impact assessments, undertake Indigenous consultation and public engagement, identify mitigation measures, and make a final decision on the project.

The proposed changes are intended to address concerns regarding the length and complexity of federal project approvals. Under the existing framework, projects frequently require multiple federal approvals and reviews by different departments and regulators. Proponents often wait five years or longer before receiving the necessary approvals to proceed with construction.² These overlapping requirements and long timelines have created uncertainty for project proponents and investors.

To address these concerns, Bill C-39 would take steps toward establishing a "one project, one decision" approach.³ For certain projects, proponents would submit a comprehensive application to the responsible authority, which would coordinate the review process and consult the relevant federal authorities. Following that review, the responsible authority would issue a single decision encompassing its own review process and the approvals of other participating federal authorities. The proposed amendments to the *IAA* include a commitment to completing this coordinated federal review process within one year of receiving all relevant information. However, the amendments that facilitate the "one project, one decision" model would only apply to select federal processes set out in the *IAA*, including reviews under the *Fisheries Act*, *Canadian Navigable Waters Act*, *Canadian Environmental Protection Act*, and *Species at Risk Act*.⁴ As a result, the "one project, one decision" model is unlikely to encompass all of the proponents' obligations for all projects, as proponents would still need to satisfy other federal processes not included in the proposed amendments, as well as any required provincial or municipal approvals.

To facilitate this streamlined process, the regulatory framework would be simplified by assigning responsibility for project assessments and approvals to a single decision-making authority. Bill C-39 would amend the *IAA* and the *CER Act* to assign specific regulators authority over certain types of projects.⁵ For most projects, the Impact Assessment Agency of Canada (the "**IAAC**") would coordinate the federal review process. The Canada Energy Regulator (the "**CER**") would serve as the authority for energy projects including pipelines, transmission lines, and certain offshore renewable projects. The Canada Nuclear Safety Commission (the "**CNSC**") would be the assessor for conducting impact assessments for nuclear and uranium projects. Although the "one project, one decision" approach would only apply directly to projects assessed under the *IAA*, separate processes coordinated by the CER and CNSC would allow those regulators to serve as the sole federal authority for projects within their respective jurisdictions. This approach is intended to place project reviews in the hands of regulators with sector-specific expertise.

The proposed amendments to the *IAA* and *CER Act* represent a significant step toward streamlining federal project approvals by improving coordination among federal authorities, introducing clearer decision-making timelines, and facilitating earlier engagement from relevant authorities. While projects would continue to require approvals from multiple levels of government,

² Government of Canada, *Bill C-39 Introduction* (21 September 2026), online: [Bill C-39 Introduction - Canada.ca](#) [Bill C-39 Introduction].

³ [Bill C-39 Introduction](#).

⁴ Bill C-39, [Schedule 1](#).

⁵ Bill C-39, Part 1, [cls. 5](#) and [127](#).

the proposed framework would reduce duplication and coordination for projects that require federal approvals.

This proposed one-year timeline would not be mandatory. Proponents would be permitted to opt out of the accelerated timeline where additional time is required for certain permits, assessments, or studies.⁶ This flexibility is intended to accommodate proponents who may not have the financing or technical capacity to satisfy all the requirements within the one-year timeline. In such cases, the decision would be delayed until all the required information becomes available. This would preserve the targeted efficiency of the new framework while giving additional time to proponents that need it.

Maintaining Meaningful Indigenous Consultation While Reducing Administrative Burden

Bill C-39 proposes changes to the Indigenous consultation framework intended to streamline the process while preserving opportunities for meaningful participation by Indigenous communities. Through amendments to the *IAA*, and the *CER Act*, and through the proposed Crown Consultation Hub (the "**Hub**") (i.e., a proposed centralized coordinator for Indigenous consultation within the IAAC), the federal government appears to be seeking improved coordination and reduced duplication in federal consultation processes.⁷ According to the federal government, the proposed model is intended to move toward one consultation process per project, per Indigenous community.⁸

The proposed amendments to the *IAA* and *CER Act* would formalize the IAAC, the CER, and the CNSC as the lead authorities for the purposes of consultation for projects within their respective mandates.⁹ As a result, Indigenous communities would likely no longer be required to engage with multiple parallel federal processes for the same project.

The Hub is not part of Bill C-39's proposed legislative amendments but was included in the federal government's Bill C-39 Introduction as a complementary proposal.¹⁰ The Hub would be established within the IAAC and would act as the centralized federal lead for consultation. In that role, the Hub would coordinate federal departments and agencies, improve coordination with provincial consultation processes, and identify Indigenous concerns earlier in the review process. Its mandate would be limited to coordinating the projects that fall within the IAAC's purview, which includes many major projects.¹¹

If enacted, the proposed addition of formal lead authorities could reduce the administrative burden on Indigenous communities by streamlining a system that often requires Indigenous groups to engage in multiple overlapping consultation and regulatory processes for the same project. Rather than navigating multiple overlapping consultation processes, Indigenous communities would be able to raise concerns through a single lead consultation coordinator. That coordinator would then be responsible for ensuring that those concerns are addressed and that the Crown's duty to

⁶ [Bill C-39 Introduction](#).

⁷ *Impact Assessment Act*, [SC 2019, c 28](#); *Canadian Energy Regulator Act*, [SC 2019, c 28](#); [Bill C-39 Introduction](#).

⁸ [Bill C-39 Introduction](#).

⁹ Bill C-39, Part 1, [cls. 7-10](#) and [127](#).

¹⁰ [Bill C-39 Introduction](#).

¹¹ [Bill C-39 Introduction](#).

consult and, where appropriate, accommodate, is satisfied. The federal government indicates that Bill C-39 would not remove consultation requirements or diminish opportunities for meaningful Indigenous participation.¹² Instead, the proposed changes focus on making consultation more efficient, predictable, and less burdensome for all parties.

Reducing Regulatory Obstacles in Regions of National Interest

Bill C-39 proposes amending the [Building Canada Act](#) to include a new "regions of national interest" designation, whereby the Governor in Council may designate a geographic area as a "region of national interest" on the recommendation of the Minister of One Canadian Economy.¹³ Prior to a designation being granted, the proposed amendments to the *Building Canada Act* would require a regional assessment to be conducted under the *IAA*.¹⁴

The proposed amendments to the *Building Canada Act* would allow for projects of the type considered in the regional assessment to bypass the impact assessment that would typically be required under the *IAA*.¹⁵ As a result, designation as a "region of national interest" would reduce procedural requirements for approval of specified projects in those regions. Designated projects within "regions of national interest" would still be subject to standardized conditions and mitigation measures identified by the regional assessment. Designation could be applied to transportation and energy corridors, telecommunications networks, energy production and transmission systems and industrial regions.¹⁶ The goal of establishing "regions of national interest" is likely to promote faster and more predictable development in the designated regions and provide greater certainty for investors.

Transportation Reforms to Improve Trade Infrastructure

Bill C-39 proposes a number of transportation-related amendments that could strengthen national supply chains and improve trade infrastructure. The proposed amendments to the [Canada Transportation Act](#) (the "CTA") and [Canada Marine Act](#) could assist in establishing "national trade corridors", modernizing ports, and reducing the regulatory burden associated with transportation projects.¹⁷ The amendments appear intended to create a more coordinated regulatory environment, clearer approval pathways, and increased national and international trade capacity.

With the aim of supporting more integrated trade corridors, Bill C-39 proposes amendments to the CTA that would allow for the designation of "national trade corridors" and authorize the creation of a National Trade Corridors Council.¹⁸ The designation of a geographic area as a "national trade corridor" would likely result in increased oversight by the federal government through the National Trade Corridors Council. According to the amendments to the CTA the role

¹² [Bill C-39 Introduction](#).

¹³ Bill C-39, Part 1, [cls. 95, 103](#) and [107](#).

¹⁴ Bill C-39, Part 1, [cl. 103](#).

¹⁵ Bill C-39, Part 1, [cl. 103](#).

¹⁶ [Bill C-39 Introduction](#).

¹⁷ *Canada Transportation Act*, [SC 1996, c 10](#); *Canada Marine Act*, [SC 1998, c 10](#).

¹⁸ Bill C-39, part 2, [cl. 198](#).

of the National Trade Corridors Council would be to identify inefficiencies in designated corridors, recommend improvements, and support the efficient operation of the transportation system.¹⁹

Bill C-39 also proposes to amend the *Canada Marine Act* with the aim of modernizing ports by providing greater commercial and financial flexibility, encouraging cooperation among ports, and increasing oversight of Canada Port Authorities. Amendments allowing port authorities to enter joint-liability arrangements and create additional entities could facilitate increased flexibility and additional private investment in ports and transportation infrastructure.²⁰ This shift toward more commercially oriented port operations could provide port authorities with additional autonomy in financing and infrastructure development, while the federal government maintains ownership.

Several proposed amendments focus on reducing regulatory burden and expediting transportation projects, consistent with Bill C-39's broader emphasis on shorter approval timelines and more efficient processes. Bill C-39 would amend the *CTA* to allow the Minister of Transportation to obtain information already provided to other federal departments.²¹ The federal government would move toward a "Tell Us Once" approach, under which information submitted to one department could be reused across federal departments.²² Proposed amendments across several pieces of legislation could streamline approval processes for lower-risk projects, as well as additional or expanded exemptions relating to the construction of railways, bridges and tunnels.²³

Labour Reforms to Minimize Disruptions to Critical Infrastructure

Bill C-39 would introduce significant reforms to federal labour relations, with a focus on reducing disruptions to critical infrastructure and supply chains. While these changes would impact labour on major projects, their inclusion in the [Canada Labour Code](#) means that they would also apply more broadly to federally regulated employees and employers. If enacted, the amendments to the *Canada Labour Code* would require earlier engagement in high-risk bargaining relationships, expand dispute resolution tools, create a new special mediator process, and establish a clearer statutory framework for government intervention in labour disputes.²⁴ Bill C-39 would also strengthen worker protections through expanded successor rights, reforms to collective agreement arbitration, and enhanced wage recovery mechanisms.²⁵ These changes support Bill C-39's broader objective of promoting economic stability and minimizing disruptions to nationally important industries.

Conclusion

Bill C-39 signals a shift toward a faster, more coordinated federal decision-making process for major projects. The proposed measures all work toward reducing regulatory complexity and providing greater certainty for project proponents and investors. As of September 25, 2026, Bill C-39 sits in its second reading in the House of Commons. If Bill C-39 is enacted as currently

¹⁹ Bill C-39, part 2, [cl. 198](#).

²⁰ Bill C-39, part 2, [cls. 217-219](#).

²¹ Bill C-39, part 2, [cl. 199](#).

²² [Bill C-39 Introduction](#).

²³ Bill C-39, part 2, [divs 2-4](#) and [7](#).

²⁴ Bill C-39, part 3, [div 1](#).

²⁵ Bill C-39, part 3, [div 1](#).



drafted, project proponents should consider how these changes may affect their existing plans, project timelines, and expectations going forward. For further information, please reach out to any member of our [Energy](#) or [Business Law](#) group.