



**RNAO response to *Getting Major
Projects Built in Canada -
Discussion Paper on Proposed
Legislative, Regulatory and Policy
Reforms***

July 20, 2026



The Registered Nurses' Association of Ontario (RNAO) is the professional association representing more than 57,250 registered nurses (RN), nurse practitioners (NP) and nursing students in all roles and sectors across Ontario. Since 1925, RNAO has advocated for healthy public policy, promoted excellence in nursing practice, increased nurses' contribution to shaping the health system, and influenced decisions that affect nurses and the public we serve.

Executive summary

RNAO welcomes the opportunity to respond to the federal government's *Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory and Policy Reforms*. RNAO recognizes the importance of economic development, infrastructure investment and efficient regulatory processes. However, RNAO is concerned that the discussion paper advances a deregulatory approach that emphasizes accelerated approvals and streamlined oversight while giving insufficient attention to health, health equity, Indigenous rights, climate stability and the social and environmental determinants of health.

RNAO's primary recommendation is that the federal government not proceed with reforms that would weaken environmental assessment, consultation or regulatory oversight. Instead, any reform should strengthen protections for health, equity, climate stability and the social and environmental determinants of health.

The submission makes three central arguments:

- Health must be recognized as a central consideration in major project decision-making. Major projects shape the conditions in which people are born, grow, live, work and age. Project assessments should therefore consider impacts on population health, community wellbeing, health equity and health system sustainability with the same rigour applied to economic impacts.
- Environmental protection and climate action are health imperatives. Clean air, safe water, healthy ecosystems, biodiversity and a stable climate are foundational determinants of health. RNAO is concerned that compressed timelines, consolidated consultation, single project authorities, economic zones and streamlined regulatory requirements could weaken oversight and increase risks to communities, ecosystems, future generations and the health system.
- Canada needs a broader vision of prosperity and wellbeing. Prosperity should not be measured by GDP growth, resource extraction or project approval speed alone. It should be measured by whether people are healthier, inequities are reduced, communities are stronger, ecosystems are protected and future generations inherit a more sustainable and resilient society.

RNAO urges the federal government to stop the deregulatory agenda reflected in the discussion paper and pursue a new approach that strengthens environmental assessment, meaningful

consultation, Indigenous rights, health equity, climate action and the social and environmental determinants of health.

Introduction

RNAO welcomes the opportunity to comment on the federal government's discussion paper, *Getting Major Projects Built in Canada – Discussion Paper on Proposed Legislative, Regulatory and Policy Reforms* (1).

RNAO recognizes the importance of economic development, infrastructure investment and efficient regulatory processes. Canada needs investments that strengthen communities, support economic resilience and contribute to long-term prosperity (2). However, the discussion paper approaches major projects primarily through the lenses of economic growth, competitiveness and regulatory efficiency. It also advances a deregulatory approach that emphasizes accelerated approvals and streamlined oversight. As a result, it gives insufficient attention to health, health equity and the social and environmental determinants of health, even though these are among the strongest predictors of population wellbeing (3–5).

Major projects are not only economic projects. They are also health projects. The industries we develop, the infrastructure we build, the energy systems we choose, the environmental and climate conditions we create and the communities we shape have profound implications for the health of current and future generations (6,7).

For these reasons, RNAO's primary recommendation is that the federal government not proceed with reforms that weaken environmental assessment, consultation and regulatory oversight. Instead, any reform should strengthen protections for health, equity, climate stability and the social and environmental determinants of health.

1. Health must be recognized as a central consideration in major project decision-making

Major projects shape the social and environmental determinants of health – the conditions in which people are born, grow, live, work and age, and the environmental systems that sustain life and wellbeing (8). Decisions about transportation, energy, housing, land use, employment and environmental protection can affect air and water quality, climate change, housing affordability, occupational health and safety, food security, community cohesion and access to services (2). Because these factors influence health across the lifespan, they must be central to project planning and approval.

RNAO believes that health impacts should be assessed with the same rigour as economic impacts. Project planning, evaluation and approval processes should explicitly consider effects on population health, community wellbeing, health equity and health system sustainability. The

ultimate question is whether a project contributes to healthier people, healthier communities and a healthier future – not merely increased economic activity.

Particular attention must be given to health equity (9). The benefits and harms associated with major projects are not distributed evenly. Indigenous Peoples, racialized communities, newcomers, people on low incomes, people with disabilities, children and older adults, as well as those living in northern and rural communities face greater barriers related to social, economic and environmental determinants of health. Project assessments should therefore examine how proposed projects may affect the distribution of these determinants and whether they will narrow or widen existing health inequities.

Equally important is ensuring that communities most affected by proposed projects can participate meaningfully in decision-making. Vulnerable and marginalized populations often face greater barriers to participation in consultation and engagement processes, yet they are also the populations most likely to experience inequitable health outcomes. Measures that restrict, shorten or otherwise limit public consultation risk excluding those whose health and wellbeing may be most affected. Effective assessment therefore requires both health equity analysis and equitable participation.

Meaningful engagement with Indigenous Peoples is especially important (10). Indigenous Peoples continue to experience significant health inequities rooted in colonization and longstanding inequities in housing, income, education, access to services and environmental conditions (11). Many major projects are in regions and areas near Indigenous communities and can directly affect the air, water, lands and ecosystems on which those communities depend. Indigenous rights, self-determination and reconciliation are not separate from health considerations; they are integral to the health and wellbeing of Indigenous communities and to Canada's commitments under the United Nations Declaration on the Rights of Indigenous Peoples, including the right to free, prior and informed consent (12). Indigenous knowledge systems and perspectives can also strengthen understanding of the relationships among environmental stewardship, community wellbeing and long-term health.

2. Environmental protection and climate action are health imperatives

RNAO is concerned that the reforms proposed in the discussion paper could weaken environmental assessment and oversight processes that play an essential role in protecting population health.

The discussion paper (1) proposes six major measures intended to accelerate project approvals and increase regulatory certainty: [1] federal review and decision-making in no more than one year; [2] one Crown consultation process; [3] a single set of conditions applied throughout the project lifecycle; [4] single project authority at the federal level; [5] enabling economic zones through regional impact assessments; and [6] a streamlined regulatory environment. While RNAO

recognizes the government's stated objective of reducing duplication and improving predictability, these measures raise serious questions about whether health, environmental and equity considerations will receive sufficient attention.

RNAO recognizes that the discussion paper is framed in the language of efficiency, coordination and certainty. However, a framework that shortens approval timelines, consolidates consultation, establishes single project authorities, enables economic zones, and allows regulatory requirements to be streamlined or pre-determined is a deregulatory framework, not merely administrative reform (13).

The concern is not only that environmental assessment would formally continue to exist. The concern is that the proposed reforms could significantly weaken the conditions under which assessment, consultation and oversight take place. If timelines are compressed, regional or strategic assessments are used to pre-clear categories of projects or areas of development, economic zones allow requirements to be modified or bypassed, and decision-making authority is increasingly centralized, then assessment processes may become less able to protect health, ecosystems, Indigenous rights and the public interest.

These tools would not be limited to the current government or its stated intentions. Once established, they could be used by future governments that may place even less priority on environmental protection, climate action, health equity or sustainability. Public policy must therefore be assessed not only by how current decision-makers say they intend to use new powers, but also by how those powers could be used over time.

From a health perspective, RNAO is concerned that this approach could make it easier to advance projects that would face more rigorous scrutiny, stronger conditions, slower approval or even rejection under existing processes. Accelerating projects by reducing opportunities for evidence, consultation and oversight risks transferring costs to communities, ecosystems, future generations and the health system.

The proposed one-year limit for federal review and decision-making may reduce delays, but it could also constrain the time available to assess complex environmental, health and social impacts, particularly for large projects with significant cumulative effects. Environmental Defence – a leading Canadian environmental advocacy association – has warned that a one-year timeframe would make it impossible to adequately consider project impacts (14). Compressed timelines can limit opportunities to gather baseline data, evaluate alternatives, assess cumulative effects and incorporate independent scientific evidence. Thorough assessment is especially important where projects may affect air quality, water quality, climate emissions, biodiversity, housing, transportation systems or community wellbeing.

A single Crown consultation process may improve coordination, but it must not reduce opportunities for meaningful engagement by Indigenous Peoples, local communities, public health experts and other stakeholders. Environmental and civil society organizations have raised concerns that fast-tracking major projects can limit public participation and weaken protections for

Indigenous rights (15). Accelerated consultation can make it more difficult for affected communities to review technical information, obtain expert advice and participate meaningfully in decisions that affect their health and wellbeing.

The proposal to establish a single set of conditions throughout a project's lifecycle may provide certainty for proponents, but it could reduce flexibility to respond to new scientific evidence, changing environmental conditions or emerging health risks. Environmental law organizations have emphasized that the proposed reforms could weaken major project reviews and environmental safeguards (15). Adaptive management is often necessary because project impacts evolve, scientific understanding develops and climate-related risks intensify over time.

Regional assessments and strategic planning may offer opportunities to consider cumulative impacts at a broader scale. However, West Coast Environmental Law has cautioned that the federal proposals could dramatically weaken major project reviews (13). Regional assessments should complement – not replace – project-specific reviews. They may not adequately capture localized impacts on communities, ecosystems, watersheds or species, nor fully assess how individual projects contribute to cumulative environmental burdens.

The proposal to enable economic zones through regional impact assessments raises additional concerns. West Coast Environmental Law – a non-profit environmental law organization based in Vancouver, B.C. – has identified economic zones and regional assessments as part of the broader deregulatory package (13). If economic zones are used to pre-approve categories of development or establish presumptions in favour of future projects, project-specific environmental, health and Indigenous rights considerations may receive less scrutiny. Communities located within these zones could face increased cumulative impacts if multiple projects proceed under a more permissive regulatory framework.

The "one project, one review" approach may reduce duplication among governments, but it also risks weakening protections if harmonization is pursued primarily to accelerate approvals. CELA has warned that the federal proposals would weaken legislative safeguards that protect navigable waters, marine environments, fish and fish habitat, species at risk and environmental review processes (16). Coordination should not become a mechanism for adopting the lowest common denominator among regulatory requirements or narrowing the scope of issues considered.

The proposal to establish a single federal project authority may concentrate decision-making power in ways that reduce independent oversight and limit the diversity of expertise brought to assessments. Ecojustice – Canada's largest environmental law charity – has characterized the discussion paper as proposing rollbacks of environmental regulations and impact assessment law (17). Effective review processes benefit from the involvement of agencies with specialized expertise in environmental protection, public health, fisheries, climate science and Indigenous relations. Centralization should not come at the expense of rigorous, multidisciplinary review.

Finally, the commitment to a streamlined regulatory environment raises broader concerns about whether efficiency is being prioritized over precaution, prevention and public accountability.

Environmental Defence has warned that the proposed changes would dismantle decades of progress on environmental protections by restricting thorough project reviews and moving decision-making behind closed doors (14). Regulatory safeguards are often characterized as barriers to development when, in practice, they identify risks, prevent harm and avoid costly environmental and health consequences. Streamlining should not mean reduced oversight, narrower assessments, diminished participation or weaker consideration of cumulative and long-term impacts.

Taken together, these measures could significantly alter how major projects are assessed and approved in Canada. Unless accompanied by strong safeguards, they risk weakening processes that protect the social and environmental determinants of health, identify risks before harm occurs and ensure that long-term public wellbeing remains central to decision-making.

Environmental protection and public health are inseparable. Clean air, safe water, healthy ecosystems, biodiversity and a stable climate are foundational determinants of health. Policies that weaken environmental safeguards can also weaken protections for human health.

Canada is already experiencing the health consequences of climate change through worsening wildfires, floods, extreme heat events, air pollution episodes and other climate-related disasters. These events contribute to illness, injury, displacement, mental health challenges and premature death, while placing increasing pressure on health systems and public infrastructure.

RNAO is also concerned that the proposed reforms could reduce scrutiny of greenhouse gas emissions associated with major projects and weaken consideration of Canada's obligation to transition away from fossil fuels. In practice, the measures outlined in the discussion paper appear consistent with an economic development strategy that prioritizes continued fossil fuel expansion, as reflected in the federal government's memorandum of understanding with the Government of Alberta (18) and ongoing efforts to facilitate new pipelines and other fossil fuel infrastructure. By limiting the assessment of climate impacts and prioritizing accelerated approvals, these reforms could facilitate projects that increase emissions, lock in long-term fossil fuel dependence and delay the transition to a low-carbon economy.

Such outcomes would exacerbate climate change, undermine Canada's climate commitments and weaken Canada's contribution to addressing one of the most urgent public health and environmental challenges of our time (3). RNAO is particularly concerned about any changes that could reduce the assessment of cumulative environmental impacts, limit consideration of climate impacts or weaken protections for ecosystems that provide essential services such as clean water, flood mitigation and climate regulation.

Environmental assessment processes are often characterized as administrative burdens or “red tape”. RNAO views them differently: they are also preventive health measures. They help identify risks before harm occurs, support evidence-informed decision-making and reduce future human, environmental and economic costs (3).

For these reasons, environmental protection, climate action and biodiversity conservation should be understood both as environmental objectives and essential public health objectives.

3. Canada needs a broader vision of prosperity and wellbeing

The discussion paper is grounded in a vision of prosperity that places considerable emphasis on resource extraction, industrial development, competitiveness and economic growth. While important, these considerations alone provide an incomplete measure of national progress.

RNAO believes prosperity encompasses far more than GDP growth. A prosperous society is one in which people enjoy good health, equitable opportunities, affordable housing, quality education, meaningful employment, strong social support, healthy environments and resilient communities. Prosperity includes wellbeing, equity and sustainability, not simply economic output (6,7).

The discussion paper gives little attention to the social determinants of health, despite extensive evidence that factors such as income, housing, education, employment conditions, food security and social inclusion are among the most important drivers of health outcomes.

RNAO is also concerned by the limited attention paid to the care economy, including health care, public health, home care, long-term care, childcare, education and community services. These sectors are essential to population wellbeing, create substantial employment, strengthen communities and contribute to long-term economic resilience. Yet they are largely absent from a discussion that seeks to promote national projects or define Canada's future prosperity.

RNAO also questions whether accelerating approvals for projects associated with high greenhouse gas emissions and environmental degradation is consistent with building a resilient economy for the future. Long-term prosperity will depend increasingly on healthy populations, climate resilience, sustainable infrastructure, clean energy systems and thriving communities.

The success of public policy should ultimately be measured not only by economic growth, but by whether people are healthier, inequities are reduced, communities are stronger and future generations inherit a society that is more sustainable, resilient and prosperous than the one we enjoy today.

Conclusion

RNAO's first and most urgent recommendation is that the federal government not proceed with the deregulatory legislative and regulatory package reflected in the discussion paper.

While the proposals are framed in the language of efficiency, coordination and certainty, their practical effect would be to weaken the conditions under which environmental assessment, consultation and regulatory oversight take place. In RNAO's view, this would place health, health equity, Indigenous rights, climate action, environmental protection and the broader public interest at risk.

RNAO supports improving the efficiency, predictability and effectiveness of regulatory processes. However, those improvements must be pursued within a framework that strengthens protections for people, communities, ecosystems and future generations. Efficiencies must not come at the expense of robust decision-making. This includes compressing timelines in ways that limit evidence, reducing meaningful consultation, pre-clearing development through economic zones, narrowing project-specific review, or increasing political discretion to advance projects that would face more rigorous scrutiny under existing processes.

The federal government's approach to major project development should be guided by a broader understanding of the public interest that includes health, equity, reconciliation, climate stability and environmental stewardship alongside economic considerations. If the government wishes to improve project assessment processes, it should do so through a new approach that strengthens safeguards and places the social and environmental determinants of health at the centre of decision-making.

RNAO therefore urges the federal government to:

- Stop the deregulatory legislative and regulatory agenda reflected in the discussion paper, including measures that could weaken environmental assessment, constrain meaningful consultation, reduce regulatory oversight, enable economic zones, or otherwise diminish protections for health, ecosystems and the public interest.
- Maintain and strengthen environmental assessment and oversight mechanisms that protect both ecosystems and population health.
- Explicitly incorporate health and health equity considerations into major project assessment and approval processes.
- Ensure meaningful Indigenous engagement, uphold commitments to reconciliation and Indigenous rights, and respect the principle of free, prior and informed consent.
- Evaluate major projects through the lens of the social and environmental determinants of health.
- Broaden the definition of national and major projects to include investments that directly improve people's lives and wellbeing, including strengthening public health systems and pharmacare, expanding affordable and supportive housing, enhancing social programs, improving primary care, long-term care and community care, investing in education and child care, and building the public infrastructure that supports healthy, equitable and resilient communities.
- Adopt a broader vision of prosperity that prioritizes wellbeing, equity, sustainability and long-term resilience alongside economic development.

The decisions made today about major projects will shape the health and wellbeing of Canadians for generations. Canada must ensure that those decisions contribute not only to economic growth, but also to healthier people, healthier communities and a healthier future. However, Canada will not achieve these goals through a deregulatory approach that weakens environmental assessment, limits meaningful consultation or reduces protections for health, equity and the environment.

Instead, progress depends on strengthening the safeguards and public-interest processes that support healthy, equitable and sustainable communities.

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