

## Guide to public comments on listing the West Coast Oil Pipeline as a project of national interest

### What is happening?

On July 2, 2026, Ottawa announced plans to refer the new West Coast Oil Pipeline, a 1,250-km line running from Bruderheim, Alberta to a new marine export terminal on BC's south coast to the Major Projects Office for designation as a "project of national interest" under *the Building Canada Act (BCA)*. *The BCA* was enacted as part of Bill C-5, *the One Canadian Economy Act*, which became federal law on June 26, 2026. That designation would allow the pipeline to bypass parts of the standard environmental review and permitting process.

On August 1, the government published a formal notice of this in the Canada Gazette, [opening a public comment period](#). Cabinet will decide whether to list the pipeline based on a specific legal test: a [five factors criteria](#) set out in *the BCA*. ORCIE encourages submissions that speak directly to those factors, as they will carry more weight than general climate arguments.

It is important to be aware before you write: this decision is not starting from neutral. Canada and Alberta signed a Memorandum of Understanding on this pipeline in November 2025 and an Implementation Agreement in May 2026, and the two governments are [targeting](#) an October 1, 2026, listing date. **The comment period is a real, legally required part of the process, and it builds a public record that matters for transparency and for any future legal challenge.** This would also be the first project designated under *the Building Canada Act*: how rigorously the five factors get applied here becomes the working precedent for every project that follows. A large public record of dissent has its own value, separate from whether it changes this particular outcome.

### Submission details

- **Deadline:** September 18, 2026
- **How to submit:** Send your written comments (around 500-1000 words) by email to [WCOPComment-CommentaireOCO@mpo-bgp.gc.ca](mailto:WCOPComment-CommentaireOCO@mpo-bgp.gc.ca)
- **Who decides:** The Governor in Council (Cabinet), based on a recommendation process run through the Major Projects Office, with Minister Dominic LeBlanc coordinating the consultation with Alberta and BC
- **Target decision date:** October 1, 2026, is a political target, not a legal deadline. The actual decision could come earlier, later, or not at all by that date.
- **Recommendations:** Structure your letter around *the BCA*'s five national-interest tests rather than general opposition. As well, consultations sometimes discount volume that reads as a form letter. Taking distinct angles, even when they share the same underlying facts, produces submissions that don't look copy-pasted from each other.

## **The five criteria, and what to say about each**

The Act asks the government to assess how well the project meets each of [five factors criteria](#). Pick the ones you find most compelling, you don't need to address all five.

### ***Does it strengthen Canada's autonomy, resilience, and security?***

A pipeline that ties Canada more tightly to global oil markets and a handful of buyers doesn't strengthen energy independence. Instead, it deepens exposure to price swings and uncertain demand. As P.M. Carney has said himself, true energy security comes from investing in domestic clean electricity and grid capacity: "While we have no control over the price of oil, we have lots of control over the price of our electricity."

Even on the government's own logic, the case is thin. The argument for this pipeline is that it reduces Canada's dependence on selling oil to the U.S. alone. Trans Mountain's expansion already opened Pacific port access to Asian buyers in 2024, largely along this same corridor. A second pipeline running the same corridor adds little security the first one hasn't already delivered.

### ***What economic benefits does it actually provide?***

The financing structure isn't settled. Pembina Pipeline, the only named private investor, holds just a 10 per cent stake with an option to reach 20 per cent, and has said it won't risk its own capital before making that call. Alberta's premier has said what taxpayers owe "remains to be negotiated," and Canada's own energy minister has already [acknowledged](#) taxpayers could be on the hook. A project so dependent on public financing should not be counted as a straightforward economic win for Canada. Timing is a problem too. The pipeline isn't expected online until 2032 to 2034. By then, several energy economists expect global oil demand growth to be slowing, not rising.

### ***How likely is it to actually be built as planned?***

The original Trans Mountain pipeline is the closest comparison available, and it is not reassuring. Its expansion was estimated at \$5.4 billion in 2013, revised to \$7.4 billion in 2017, and finished in 2024 at close to \$34 billion. The Major Projects Office, now assessing whether this pipeline can be built as planned, is run by Dawn Farrell: the former Trans Mountain CEO who oversaw that project through to completion. Independent estimates of the new pipeline's full cost, including the linked Pathways carbon capture project and port upgrades, already run above \$100 billion once likely overruns are included.

### ***Does it advance the interests of Indigenous peoples?***

The [Union of British Columbia Indian Chiefs called on Ottawa and Alberta](#) in August 2026 to halt the project, saying consultation has not been conducted in good faith. More than 40 civil society organizations, with Indigenous and faith groups [including ORCIE](#), signed a [joint letter](#) opposing new fossil fuel pipelines. By one legal estimate, the route crosses the traditional territories of 90 to 125 Indigenous communities. A 30-day comment window, running alongside consultations [described as only recently begun](#), is hard to reconcile with a serious assessment of this criterion. There is direct precedent here, too. Ottawa has already lost or delayed two nearly identical pipeline-to-BC-coast projects, Northern Gateway and the original Trans Mountain expansion, specifically because courts found consultation inadequate. Asking the same government to certify adequate consultation on a faster timeline than either precedent, for a larger project, is not a credible claim.

### ***Does it contribute to Canada's climate goals?***

This is the weakest part of the government's case. The linked Pathways carbon capture project is being publicly described as delivering 16 megatons of emissions reductions a year, but only 6 of those megatons are a [firm, dated commitment](#): by 2035. The other 10 are filed under "additional reductions" from further expanding Pathways, unnamed other technologies, or improved production practices, with no specific project attached and a decade further out, by 2045. Meanwhile, the pipeline's own upstream emissions are estimated at roughly 40 megatons a year. A capture project contracted at a fraction of the announced figure, attached to a pipeline whose emissions dwarf it, does not contribute to Canada's climate goals. Add Alberta's own stated ambition, tied to this same agreement, to double oilsands production to eight million barrels a day, and the pipeline is not contributing to Canada's climate goals: it is structurally opposed to them.

The notice itself has landed inside a live illustration of what is at stake. The same 24 hours it was published, more than 5,000 British Columbians were placed under evacuation orders as wildfires surged past 100 active fires province wide.

### **How to frame your submission?**

Say who you are and why this decision affects you: describe where you live and work. Do you have a connection to the BC coast or Alberta or to communities along the route? Do you have a concern for the young people who will live with this decision the longest? Reference the specific criterion or criteria you're addressing. Keep it focused; a short, specific comment that engages the actual test is worth more than a long one that doesn't.

ORCIE would be pleased to share a copy of your comments on our website. If you are able, please send a copy to [info@orcie.org](mailto:info@orcie.org)