September 10, 2026

The Honourable Dominic LeBlanc
Minister of One Canadian Economy
Sent to WCOPComment-CommentaireOCO@mpo-bgp.gc.ca

RE: LETTER IN SUPPORT OF LISTING THE WEST COAST OIL PIPELINE AS A PROJECT OF NATIONAL INTEREST

Dear Minister LeBlanc:

The Independent Contractors and Businesses Association (ICBA) welcomes the opportunity to comment in advance of the Governor in Council's decision on listing the proposed West Coast Oil Pipeline in Schedule 1 of the *Building Canada Act*.

ICBA is the largest construction association in Canada, with more than 6,000 members, clients and affiliated companies, primarily in British Columbia and Alberta. ICBA is a strong advocate for open markets, fair and competitive public tendering, cost-effective regulation, and the responsible development of Canada's natural resources. ICBA is also one of the largest sponsors of trades apprentices in Canada, directly trains thousands of construction professionals every year, and provides group benefit plans to more than 330,000 Canadians. Our members are the contractors and workers who would build the West Coast Oil Pipeline (WCOP).

ICBA strongly supports listing WCOP in Schedule 1 of the *Building Canada Act*, and urges the Governor in Council to do so by October 1, 2026, so that permitting can proceed on the timeline contemplated in the Implementation Agreement for the Canada-Alberta Memorandum of Understanding and construction can begin as early as September 1, 2027.

Every year of delay is a year of forgone incomes for Canadian workers, forgone revenue for Canadian governments, forgone jobs, and further erosion of Canada's reputation as a place where large-scale industrial and infrastructure projects can be reviewed, approved and completed within a reasonable time frame.

Economic and Employment Opportunities

WCOP brings enormous economic opportunities. The Alberta government's submission projects $70 to $81 billion in construction and related upstream spending between 2026 and 2038, lifting national real GDP at the peak of construction in the early 2030s to roughly 0.4 per cent above where it would otherwise stand, with increased oil production adding over 0.6 per cent per year by the 2040s. TD Economics estimates that at one million barrels per day, WCOP would expand Canada's crude export capacity by close to 20 per cent.

For British Columbia, WCOP will be among the largest sources of new industrial construction work available this decade and into the 2030s. The project would direct $29 to $38 billion in construction spending into the province between 2026 and 2038, lifting provincial real GDP by almost 1.5 per cent at peak in the early 2030s. With the project producing up to 140,000 jobs nationally, estimates suggest up to 70,000 of these will be in B.C.

This comes at a moment when British Columbia's construction industry needs it most. ICBA's 2026 Construction Survey found that, for the first time in years, contractors are scrambling for work: one in five member companies expect less work this year, and those anticipating a decline forecast an average 25 per cent drop. WCOP would put a decade of committed industrial work in front of a large and economically crucial B.C. industry that is currently shedding capacity, and give contractors the confidence to hire, invest in equipment, and sponsor the apprentices B.C. will need as 46,700 construction workers retire over the next ten years.

For Alberta, WCOP does two things at once: it unlocks oil production growth and narrows the discount that additional crude oil would otherwise face. Increased oil production starting in the 2030s could raise provincial real GDP by over 3.5 per cent by the 2040s. On price, Western Canadian Select traded roughly US$13 below West Texas Intermediate in July 2026. This is a discount that exists partly because Canadian producers continue to have limited ability to reach buyers other than American refiners. When the Trans Mountain Expansion Project (TMX) entered service in May 2024 and eased constraints on Canada's export pipeline capacity, the price differential between WCS and WTI narrowed from about US$18.70 per barrel in the period from September 2023 to April 2024 to an average of US$12.00 per barrel over the period from June 2024 to July 2025.

Barrels that cannot reach tidewater sell at a discount, and much of that discount represents forgone Canadian wealth that is priced away. TD Economics found that WCOP would "more than double the volume of oil able to reach tidewater for overseas shipment." This improvement in market access could narrow that gap by up to US$3 per barrel, and be worth up to 0.2 per cent of Canadian GDP annually at peak.

Trade Diversification

As the ongoing Canada-U.S. trade conflict has made unavoidably clear, Canada's main economic vulnerability as a major energy exporting nation is that roughly 90 per cent of our crude oil exports by value still go to a single customer.

As the only pipeline carrying Western Canadian crude to Asian refineries without transiting the United States, Trans Mountain has proved that export market diversification works to Canada's advantage. Before the expanded TMX pipeline came online, Canada sold $50 million of oil to Asia (in 2023). By 2025, the figure had increased 186-fold to reach $9.3 billion, according to ATB Economics. Non-U.S. crude exports rose from about 3 per cent of total Canadian oil exports before the expanded TMX came online to a record 14.1 per cent in November 2025. Looking ahead, an important goal for Canadian policymakers must be to increase the share of our growing crude oil output that can be shipped to offshore markets. The proposed new west coast pipeline clearly supports that goal.

At present, Canada's takeaway capacity is running behind growing global oil demand. In June 2026, TMX reached apportionment for the first time since the expanded system commenced operations, having run at roughly 84 per cent utilization a year earlier. Canadian crude oil production is expected to exceed last year's record of 5.3 million barrels per day, with Alberta's stated goal being to reach eight million b/d within a decade. However, Trans Mountain's announced optimization projects are expected to add only 300,000 b/d of capacity by the end of 2028. The narrowing of oil price differentials that the expanded TMX delivered – worth an estimated $4 billion a year in additional industry revenue – is waning as production grows against fixed egress.

WCOP would be crucial to the Prime Minister's commitment to double Canada's non-U.S. exports over the coming decade. Oil is Canada's single largest export product, accounting for around one-fifth of merchandise export earnings. The Business Council of Alberta estimates that a second west coast pipeline matching TMX's export patterns would lift the value of Canada's non-U.S. crude exports from $20 billion to $50 billion annually, raising the non-U.S. share from 15 per cent to 23 per cent by value. No other new individual project would do more to support the government's ambitious export diversification objective.

This is what the *Building Canada Act* was Created For

The *Building Canada Act* and the Major Projects Office exist precisely to move projects of this scale. With an estimated $650 billion in major projects on the books in British Columbia and Alberta alone, what Canada has lacked is not ambition or capital, but a regulatory and permitting system capable of turning proposals into completed assets on a commercial timeline.

WCOP is the most visible test case, and global capital is watching.

Every part of this project must be competitively tendered

To maximize the success of WCOP and deliver value for Canadian and Alberta taxpayers who will be standing behind the project, all work on WCOP, including pipeline, terminals, pump stations, power interconnection, marine facilities, and every associated contract, should be tendered on an open, competitive, labour-neutral basis.

Contracts should be awarded to bidders on the basis of criteria such as safety record, qualifications, experience, price, and demonstrated capacity to deliver. More than 85 per cent of the construction workforce in B.C., and 88 per cent of Alberta's, do not belong to a building trades union. Any procurement model that restricts bidding to union signatories would shut out the overwhelming majority of the workers needed to build this project on schedule – at exactly the moment when labour supply is becoming the binding constraint on delivery.

Open competition is the mechanism that delivers the lowest responsible price, the deepest available labour pool, and the schedule certainty that a national interest designation is meant to protect.

ICBA urges the Governor in Council to list the West Coast Oil Pipeline in Schedule 1 without delay, and to ensure that the work of building it is open to every qualified Canadian contractor and every skilled Canadian worker.

Thank you for your attention to this matter.

Sincerely,
INDEPENDENT CONTRACTORS AND BUSINESSES ASSOCIATION

Chris Gardner
President and CEO