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Intergovernmental Affairs – Internal Trade
Privy Council Office
85 Sparks Street, Room 1000
Ottawa, Ontario
K1A 0A3
internaltrade-commerceinterieur@pco-bcp.gc.ca

To whom it may concern,

CIFFA Corp. - Canada's leading supply chain organization, is pleased to provide this submission in support of the development of regulations under the *Free Trade and Labour Mobility in Canada Act*.

Our membership includes freight forwarders who manage about 80% of Canada's non-commodity trade. This includes all modes of transport for both domestic and import/export shipments such as port truckers moving freight to and from ships, warehouses where goods are stored and even customs brokers who ensure the rapid passage of goods through the vast complexities of customs and security. Our associate members include air, marine, rail and truck carriers, transportation law firms and cargo insurance companies. In short – CIFFA Corp. represents the full spectrum of Canada's supply chain, and the work of our membership is worth billions of dollars in annual economic activity. Our members agree that having the federal government engaging with provinces and territories to achieve mutual recognition of regulations, policies, and processes is essential towards achieving stronger trade within our own borders.

At CIFFA Corp, we strongly support efforts to accelerate removal of interprovincial/territorial trade barriers through legislation and other avenues. As it currently stands, these barriers across Canada pose significant challenges to the supply chain sector, impacting costs, efficiency, and safety. These barriers include inconsistent regulations, infrastructure disparities, and labour mobility issues. Addressing these barriers is crucial for improving the competitiveness of the Canadian economy. We are aware of numerous issues that we hope the Internal Trade team will address through implementation of the *Free Trade and Labour Mobility in Canada Act*, including, but not limited, to the following:

Inconsistent Regulations negatively impacting trade: Different provinces have varying rules regarding truck weights, dimensions, licensing, and safety standards, complicating logistics and increasing operational costs. This must be standardized to create actual efficiencies and the time to do so is now, while cooperation amongst parties is at a premium.

Infrastructure Disparities acting as a trade barrier: We must address our domestic surface trade corridors to ensure all possible measures are taken to enhance cross-province shipping routes. This will drive efficiency, which in turn will create economic growth. Although difficult to address, uneven road conditions, inadequate rest areas, and inconsistent winter maintenance practices across provinces lead to increased travel time, higher maintenance costs, and safety concerns for drivers.

Labour Mobility: As an example, differences in driver licensing, training requirements, and hours of service regulations create hurdles for cross-provincial border trucking operations and contribute to labour shortages.

Tariffs and Taxation: Provincial taxes and tariffs can add to the cost of goods and create further complications for shippers. We need to fully ensure free trade of goods and labour mobility across all provincial and territorial boundaries.

With these factors in mind, we call for the following:

- 1. Harmonization of Regulation and Labour Mobility Initiatives:** Work towards consistent regulations across provinces and territories, particularly in areas like truck weights, dimensions, and driver qualifications while facilitating the recognition of driver licenses and training across provinces and addressing hours-of-service inconsistencies can improve labour availability.
- 2. Infrastructure Improvements:** Investing in and maintaining a consistent and high-quality road network across provinces, including adequate rest areas, is essential.
- 3. Digitize and streamline border processes while ensuring actual domestic Free Trade:** Implement digital solutions for any permitting procedures at interprovincial chokepoints to reduce delays and increase throughput. In addition, all efforts should be taken to remove tariffs and taxation on all domestically traded goods across Canada.
- 4. Improve data sharing and coordination:** Establish a centralized national platform for real-time supply chain data sharing among government agencies, carriers, supply chain participants (freight forwarders, freight brokers, drayage, customs brokers and warehouse operators) and shippers.

These targeted actions would help towards creating systemic improvements with our provincial and territorial partners in confederation. CIFFA and its members remain committed to working collaboratively with all levels of government to ensure Canada's supply chain is modern, resilient, and globally competitive. Reducing red tape and duplicative bureaucratic oversight between Federal and Provincial/Territorial partners is something that our members therefore strongly support.

We thank you for taking the time to review these measures and welcome any additional feedback you may have to provide

Sincerely,



Bruce Rodgers

Executive Director, CIFFA



Julia Kuzeljevich

Director, Policy and Regulatory Affairs, CIFFA