

August 28, 2025

CIFFA Pre-Budget Submission

Department of Finance Canada

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Dear Esteemed Officials,

[CIFFA Corp](#) is pleased to participate in the Department of Finance consultations for the 2026 federal budget. CIFFA's membership includes freight forwarders who manage about 80% of Canada's non-commodity trade, employing every mode of transport for both domestic and import/export shipments, but also the port truckers who move freight to and from ships, the warehouses where the goods are stored and even the customs brokers who ensure the rapid passage of goods through the complexities of customs and security.

Our associate members include air, marine, rail and truck carriers, transportation law firms and cargo insurance companies. Essentially, our 500+ members and associate members represent the full spectrum of Canada's supply chain.

Earlier this year, CIFFA Corp [issued correspondence](#) to Prime Minister Carney as part of our effort to collaborate with elected officials towards strengthening Canada's supply chains and advancing our shared economic goals. As many of the objectives outlined remain unfulfilled, we reiterate the need for implementation of these measures to improve Canada's supply chain, along with the necessary strategic overview required for successful implementation.

Specifically, we wish to call attention to three key areas that will require strong leadership from the Federal government:

1. ***Trade infrastructure via investments in ports, warehouses and trade corridors:*** *During the federal election campaign, Prime Minister Carney [pledged](#) that a Liberal-led government would be creating a new trade diversification strategy, the centrepiece of which was to be a \$5 billion Trade Diversification Corridor Fund "to accelerate infrastructure investments at ports, railways, inland terminals, airports and highways, aimed at reducing dependence on the U.S. and building a more unified national economy." CIFFA Corp supports this objective and believes such an investment is urgently needed.*

Therefore, we call on the government to ensure \$5 billion dollars is earmarked in the next budget to assist supply chain partners towards making necessary improvements to vital trade infrastructure, thus enhancing Canada's overall trading efficiency and reliability.

We also call for a transparent, efficient application process for this fund, which we assume is to replace the sunseting National Trade Corridors Fund.

*CIFFA contributed input towards the **National Supply Chain Task Force Final Report** developed by the National Supply Chain office in 2022: **Action. Collaboration. Transformation.***

The release of a national supply chain strategy document emanating from this final report has been long awaited by stakeholders and would be a positive step towards ensuring real accountability in how the spending envelope for strategic trade infrastructure spending is managed. We seek clarification on whether the recommendations of this strategy document, many of which are relevant to maintaining our strengths as a trading nation, have been included in the trade diversification policy going forward.

2. Protecting and improving Canada's global trading reputation:

More than ever before, Canada's global trading partners need to see us as a reliable and dependable trading partner. Recent protracted labour disputes impacting our ports, railways and airlines have seriously harmed Canada's reputation in this regard, and CIFFA Corp believes we must take great efforts to move towards a more amicable period in Canadian labour relations.

The labour disruptions in 2023 underscored the urgent need to prevent future interruptions to Canada's supply chains. [The Industrial Inquiry Commission on West Coast Ports: Final Report](#) provides a clear, actionable path to achieve that stability. Including these recommendations in the Budget Implementation Act would send a strong signal that Canada is committed to fostering long-term growth and competitiveness.

By allowing more resources for mediators and other vital activities at the Canadian Industrial Relations Board, in addition to examining amendments to the Canada Labour Code that could allow for a more neutral, enhanced dispute resolution process to avoid critical industries being taken offline by labour disruptions, Canada as a nation will be better positioned to work towards improved relations between industry and labour. We ask for strong leadership on this file.

3. Process Efficiency and Red Tape Reductions:

While CIFFA Corp supports active consultations for "the development of regulations under the Free Trade and Labour Mobility in Canada Act" it is clear much more needs to be done to address process efficiency and red tape – which impacts all our members. We call on the government to further streamline border processes by implementing digital solutions for customs and inspection procedures to reduce delays and increase throughput at border crossings and ports of entry. It is essential to involve supply chain leaders like CIFFA throughout this process.

A key aspect towards facilitating this would be to implement a Single Window initiative, integrating Transport Canada's Pre-load Air Cargo Targeting (PACT) Program and CBSA's EManifest reporting systems, enabling trade to file once and for government risk assessments to be completed simultaneously. As a corollary to this request, we call on the federal government to seek ways to further improve data sharing and coordination

through establishing a centralized national platform for real-time supply chain data sharing among government agencies, carriers, freight forwarders, and importers/exporters to better anticipate and manage disruptions.

We are currently seized by numerous system reliability failures, including but not limited to accuracy of data being managed by numerous systems (including CARM.) Consistent challenges related to statements of account have worsened, due to upwards of 60 system outages over the last year, which we have closely documented. At CIFFA, we have heard of rulings being revoked in CARM retroactively and unilaterally with little to no understanding of why they occur from stakeholders; all of this results in a massive financial impact borne by businesses operating across the supply chain.

Furthermore, CIFFA is hearing of financial hardship experienced by some members due to perceived misapplication of the Administrative Monetary Penalty System (AMPS), which is used to issue monetary penalties to commercial clients deemed in violation of CBSA's trade and customs regulations stemming from these system outages.

We would urge for the Department of Finance to consider the impact these issues are having on overall productivity and efficiency.

Taken together, the implementation of CARM and other systems reliability issues have caused massive disruption to industry. We call on the Government to ensure a holistic approach towards improving the current situation; simply seeking to improve communications by CBSA to stakeholders would be a low-hanging fruit in this regard.

Lastly, CIFFA Corp calls upon the Federal government to establish a pilot project to evaluate the CBSA "Authorization to Move" project, facilitating expedited movement of released containers after inspection without returning to port. We call on CBSA to directly work with industry stakeholders towards making this a reality, so we can offer solutions based on our unparalleled expertise towards a more efficient supply chain across Canada.

These priorities are practical measures which, upon implementation, would greatly enhance supply chain fluidity across Canada. By working collaboratively towards addressing these serious issues, we can ensure a much brighter future for Canadian businesses, workers and families.

CIFFA Corp would be pleased to provide further information to committee members on these initiatives and how they would help us address the numerous issues impacting the efficiency and effectiveness of our supply chains today across Canada.

Thank you for your attention in reviewing this communication.

Sincerely,



Bruce Rodgers

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CCs:

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