



June 18, 2010

Shari Currie
Director, Air Cargo Security, Transport Canada,
245 Cooper Street
Ottawa, ON K1A 0N5, Canada

By e-mail to: Shari.Currie@tc.gc.ca

Subject: Chain of Custody Document

Dear Shari;

Over the past four years CIFFA and its Member firms have strongly supported Transport Canada's initiatives to implement a safe and secure air cargo environment in Canada. This is evidenced, among other things, by our ongoing participation in industry consultations, dedication of resources to the development of effective training material, facilitation of cargo security training and communication to our membership and to the community at large. CIFFA Member firms have repeatedly stepped up to the plate. They have signed Memoranda of Understanding, created and implemented Cargo Security Plans; background checked and trained ACR and CSC employees, performed internal security assessments: in short, participated fully in the development of a secure air cargo supply chain. We will continue to work with Transport Canada to modify the program and implement changes that make sense and that contribute to a more secure supply chain; one that is robust enough to meet the needs of Canada and to gain mutual recognition with other important trading nations.

On behalf of CIFFA's 241 Regular Member firms, we are writing today to outline our concerns for any proposed change to the Air Cargo Security regime which adds paper to the process of shipping secure cargo by air to, from or within Canada. We have expressed these reservations repeatedly in stakeholder consultations with Transport Canada over the past several years. Again this week we have consulted with membership and held discussions with Air Canada Cargo. Again we are compelled to advise Transport Canada that in the opinion of the freight forwarding community the introduction of a Chain of Custody document will fail to contribute in any significant way to securing Canada's air cargo supply chain. It will most certainly add cost, drive delay, create administrative burden, fill acres of storage and contribute to the unnecessary destruction of trees. The freight forwarding community fails to understand how the introduction of a Chain of Custody document could help drive security in today's complex, paperless, e-commerce world of air cargo.

Competition in today's global marketplace is fierce. It is critically important that Canada's Air Cargo Security program creates a level playing field for our international traders and for our air carriers. Our

exporters must be armed with the most efficient and effective cargo security tools we can provide. Carriers serving our airports must not face a higher administrative burden than those serving American airports. Our security program should attract cargo to safe and secure Canadian airports; not run the risk of having our cargo diverted to more efficient American airports like New York or Chicago. Canada's security program cannot create a disadvantage to our traders: rather, it should be the opportunity to create a competitive advantage for Canada. To introduce a paper Chain of Custody document to Canada, when other countries such as the USA do not have the same restraints may negatively impact Canada's export competitiveness.

We strongly urge Transport Canada to reconsider the introduction of a Chain of Custody document and are available at your convenience to work on a more viable alternative to paper.

Sincerely;
CIFFA



H. Ruth Snowden
Executive Director

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