



October 26, 2016

The Honourable Marc Garneau,  
Minister of Transport,  
House of Commons,  
Ottawa, Ontario Canada K1A 0A6

And by email to: [marc.garneau@parl.gc.ca](mailto:marc.garneau@parl.gc.ca)

Subject: Air Cargo Security and the Urgent Need for Canine Screening in Canada

Dear Sir;

With the coming into force on October 17, 2016 of the amendments to the *Canadian Aviation Security Regulations 2012* and the *Security Measures Respecting Air Cargo* it has quickly become evident that the new regulations have created an uneven playing field for Canadian exporters shipping from Canada vis a vis shipping from the United States. The prescribed screening methods available as of October 17<sup>th</sup> are extremely cost prohibitive from both an asset and operating cost perspective and they do not provide adequate screening options for all Canadian exporters.

For a number of reasons, Canadian shippers have not embraced the new Air Cargo Security Program and become Known Consignors. Similarly there has not been adequate uptake by trucking, forwarding and warehousing organizations to become Regulated Agents or Certified Agents. Thus we have a situation where almost all cargo must be actively screened at the airport by airlines or by a limited number of commercial / third party Regulated Agents.

Backlogs notwithstanding, the issue we are most concerned about today is the limited availability of non-invasive screening. Unlike in the United States, we are limited to only one external screening method in Canada. We reference one recent example of thousands of tons of liquid product that cannot be screened adequately under the Canadian regulations but which can be screened in the United States – by two external methods. This cargo will, in all likelihood, now be trucked to the United States for uplift by a carrier from an American airport. Airlines calling in Canada will not be able to compete fairly for this cargo, Canadian airport employees will not handle this cargo, and it is even possible that the Canadian exporter may lose a multi-million dollar contract to an American competitor because we are unable to screen the cargo in Canada and lift it directly to destination.

The Canadian International Freight Forwarders Association (Ciffa) and our membership strongly support the implementation in Canada of a canine screening program. Transport Canada has been working for years on this screening method and yet today we understand that we are at least two years from being able to implement canine screening. This is not acceptable. Some Ciffa members have already begun working with local security companies, one of whom is currently providing canine screening for the GTAA. This company is also affiliated with a European security



company who is providing canine cargo screening in Europe. Canine screening appears to be well established in Europe and the USA. Canada must adopt best practices from these countries and implement canine screening quickly, before our market is eroded further. There are several canine screening companies in Canada who are technically able and who are ready now to work with air cargo.

Based on our discussions within the security community it would appear these companies are interested in working with CIFFA and Transport Canada to get this program approved in Canada. Our membership is willing to devote time and resources now to getting canine screening operational in Canada. Transport Canada must be given the directive and the resources to act now. Every day that canine screening is not available negatively impacts the fragile air cargo business in Canada.

In addition to the approval of canine screening, there should be an immediate review of other prescribed screening methods to align them with American approved methods and enable alternative external screening, as was recommended throughout industry consultations. Given the global reach of CIFFA and the association's membership we are well positioned to provide support and guidance to Transport Canada through to a successful implementation of a canine screening program.

Sincerely  
CIFFA

Gary Vince  
President of the Board

Ruth Snowden  
Executive Director

William Gottlieb  
Chair: Airfreight Committee

Copy:  
Wendy Nixon, Director, Aviation Security Program Development  
CIFFA National Board of Directors  
CIFFA Membership

*The Canadian International Freight Forwarders Association (CIFFA) represents some 259 Regular Member firms from the largest of global multi-nationals to small and medium sized Canadian companies. A vital component of Canada's global supply chain, CIFFA member companies facilitate the movement of goods around the world. Member firms provide an important link in Canada's global supply chains, enhancing trade capabilities and assisting importers and exporters— retail, commercial, and industrial in the delivery of competitive solutions. Associate Member firms are an integral part of CIFFA's structure, providing leading edge solutions in technology, warehousing, transportation, insurance and legal issues to freight forwarding Member firms.*