

**Written Submission for the Pre-Budget Consultations in
Advance of the Upcoming Federal Budget**

**By: Shannon Watt, President and CEO
Canadian Propane Association**

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Dear Chair Gould,

On behalf of the Canadian Propane Association (CPA) and its 400 members representing thousands of Canadians who produce, transport, and distribute propane and propane appliances and equipment, I am pleased to share several recommendations to the committee which would improve growth and productivity across many sectors of the economy, generating prosperity for all Canadians. We believe the propane sector is uniquely positioned to create a more integrated, mobile, and resilient Canadian economy.

As Canada works to build a one Canadian economy that is more competitive and prosperous, propane is already playing a vital role in accelerating the delivery of major infrastructure and industrial projects. Through new export terminals, Canada's propane industry has taken the lead in reducing dependence on the U.S. market, opening access to high-demand regions such as Japan. Here at home, propane is an immediately deployable, cleaner-burning energy source that fuels construction, powers off-grid worksites, and provides scalable solutions in areas where other fuels are less practical, serving large parts of the country including Indigenous, rural, and northern communities.

Propane plays an important role in fueling our economy and providing energy across the country. It quite literally helps to fuel our country. The ability to move skilled propane professionals and equipment quickly across provincial borders is essential to ensuring that these projects are completed on time and on budget.

Yet, the propane sector faces a frustrating patchwork of regulatory and labour policies that undermine this efficiency. Inconsistent training recognition, redundant permits, and overlapping inspection requirements increase costs, delay timelines, and restrict the flow of labour, all of which are at odds with the federal government's ambition to 'build up Canada' and drive economic renewal.

Removing unnecessary barriers will empower industries like ours to support federal priorities, create and sustain jobs, accelerate housing and infrastructure, and enhance Canada's energy independence. Propane is already safely embedded in the delivery of major projects across Canada. Let's ensure our policies make it easier, not harder, for it to contribute to a strengthened Canadian economy, today and for future generations.

Sincerely,



Shannon Watt

RECOMMENDATIONS

One Canadian Economy

Recommendation 1: Accelerate the adoption of the national Red Seal Certification for licensed gas fitters and collaborate with provinces on outstanding code alignments thus ensuring that qualified tradespeople can work anywhere in Canada without re-certification.

Recommendation 2: Standardize propane worker training with federally accepted training provisions such as for bulk delivery, heater setup, and plant operations, so workers can operate interprovincially without separate provincial licenses.

Recommendation 3: Encourage integrated permitting processes (e.g., single permits for gas and boiler systems) to reduce delays for construction timelines and enable propane to support large builds efficiently.

Recommendation 4: Ensure that Canadian Registration Numbers (CRNs) are respected across jurisdictions without redundant provincial inspections.

A Strong and Sovereign Canada

Recommendation 5: Ensure propane is part of the energy choice for Indigenous communities looking to transition from diesel or heating oil to lower-carbon energy sources.

Recommendation 6: Develop and strengthen policies and programs that support the export of propane to global markets who are actively seeking the resource from Canada (South Korea and Japan).

Submission Details

Recommendation 1: Accelerate Red Seal adoption and provincial code alignment for licensed gas fitters, ensuring that qualified tradespeople can work anywhere in Canada without re-certification.

Many infrastructure and energy projects, particularly in rural, northern, and Indigenous communities, depend on the timely availability of skilled gas fitters and propane professionals. **We recommend accelerating the implementation of the national Red Seal certification for Gas Fitters – Class A or B, following the models used in long-standing Red Seal programs for electricians, heavy duty equipment operators, and welders.** Although already established, there are a few outstanding provincial code alignments needed to nationally adopt Red Seal Certification for gas fitters. The Federal government can play an important role in collaborating with provinces to address these code discrepancies and accelerate the adoption of this national certification. This initiative would directly contribute to your government's vision of building a stronger, more secure, and more productive Canada. We urge your government to champion early and harmonized adoption of codes and standards through formalized Gas Fitters Reconciliation Agreements. Together, these steps will unlock labour mobility, ensure public safety, and strengthen national economic competitiveness.

Gas fitters play a critical role in delivering the housing, energy, agricultural, and industrial infrastructure that Canadians depend on, yet their mobility remains constrained by a fragmented provincial licensing system.

The propane sector is uniquely affected by these barriers due to its role in serving diverse regions, including remote and Indigenous communities where energy security and rapid deployment of skilled labour are critical. These barriers are especially problematic when urgent needs arise, such as in the construction sector, in response to emergencies, or in the roll out of decarbonization initiatives (e.g., replacing diesel with propane for cleaner heating and backup power).

Recommendation 2: Standardize propane worker training, such as for bulk delivery, heater setup, and plant operations by approving nationally accepted training, so workers can operate interprovincially without separate provincial licenses.

Currently, propane workers face significant barriers when seeking to work in different provinces or territories. Each jurisdiction requires its own license in order for workers to operate. However, the training needed for that license is identical across jurisdictions. The licence is essentially an administrative and financial burden that does not provide any additional provincial-specific training.

All of which means that even experienced and qualified workers must pay and wait to obtain new licenses to operate in each individual province. This fragmentation creates unnecessary delays, increases costs for employers and workers, and limits the ability of the propane industry to quickly respond to opportunities and urgent needs.

Having provinces recognize the existing, national standardized propane worker training across Canada would address these challenges by approving consistent federal requirements and competencies applicable across all provinces and territories. With a national standard, a worker trained and certified in one part of the country would be able to safely and legally perform their duties anywhere in Canada without having to repeat training or navigate additional licensing processes.

This approach would enhance labour mobility and flexibility, allowing the propane industry to efficiently deploy skilled workers where they are needed most. It would improve project timelines, support the timely delivery of energy solutions for housing and infrastructure, and help remote and Indigenous communities access qualified professionals for critical energy services.

We encourage close work with provincial counterparts on removing barriers to worker mobility by standardizing worker training or accepting various training licensing.

Recommendation 3: Encourage integrated permitting processes (e.g., single permits for gas and boiler systems) to reduce delays for construction timelines and enable propane to support large builds efficiently.

The delivery of construction projects in Canada often requires complex permitting procedures that can involve multiple, overlapping applications for different systems, including gas and boiler installations. For the propane industry and its customers, this means that a project may be delayed as companies seek separate approvals from various regulatory bodies, even when the work is closely related and could be assessed together.

These fragmented permitting processes contribute to increased costs, administrative burden, and unnecessary delays that can impact the timely completion of housing, infrastructure, and industrial projects. Such delays are particularly challenging for projects in remote, rural, and Indigenous communities where access to skilled trades and resources is already limited.

Encouraging a nationally standardized integrated permitting process, such as allowing a single streamlined permit for gas that integrates boiler system information, would simplify the regulatory process for both industry and regulators. This change would help construction projects proceed more quickly and efficiently by reducing paperwork, minimizing wait times, and cutting down on redundant inspections. **This will help unlock the full value of propane for large builds and critical projects across the country.**

Recommendation 4: Ensure that Canadian Registration Numbers (CRNs) are respected across jurisdictions without redundant provincial inspections.

The Canadian Registration Number (CRN) system is designed to ensure that pressure equipment, such as propane tanks and related components, meet rigorous safety and engineering standards. Once a piece of equipment receives a CRN, it has been reviewed and approved according to established technical criteria. However, despite the existence of this national system, many provinces and territories require their own additional inspections or

registrations, even for equipment that has already been certified with a CRN elsewhere in Canada.

This lack of mutual recognition creates unnecessary administrative hurdles and costs for manufacturers, suppliers, and end users. It can slow down the delivery of essential propane equipment, delay construction schedules, and raise project expenses. These inefficiencies are especially problematic for large-scale projects and for the timely deployment of energy solutions in rural, remote, or fast-growing regions.

Respecting CRNs across all jurisdictions would streamline the approval process and eliminate redundant inspections for equipment that has already met national safety standards. This approach would improve the efficiency of the supply chain, reduce delays, and lower costs, all while maintaining the highest levels of safety and reliability.

We encourage close collaboration with provincial counterparts on this issue.

Recommendation 5: Ensure propane is part of the energy choice for Indigenous communities looking to transition from diesel or heating oil to lower-carbon energy sources.

Many Indigenous and remote communities in Canada continue to rely on diesel for heating and power generation. This presents a variety of health, environmental, economic, technical, and social challenges, including air, land, water, and noise pollution, the risks of fuel spills/leaks, high cost of energy and land remediation, supply issues, and capacity constraints.

There is a critical and immediate opportunity to support Indigenous and rural communities in transitioning to cleaner, more sustainable energy systems. Propane—already widely available across Canada—is a lower-emission, affordable, and reliable alternative to diesel. For communities seeking to integrate renewable energy, propane is also the most dependable and cost-effective backup fuel, ensuring energy continuity when solar, wind, or hydro systems are unavailable due to weather or grid limitations.

Recommendation 6: Develop and strengthen policies and programs that support the export of propane to global markets who are actively seeking the resource from Canada (South Korea and Japan).

The federal government should develop and strengthen targeted policies and programs that support the growth of Canadian propane exports to key international markets—particularly Japan and South Korea, which are among the largest global consumers of propane and have demonstrated strong interest in securing Canadian supply.

Canada holds a unique geographic and geopolitical advantage in serving the Asia-Pacific region. Export terminals on the Pacific Coast allow for significantly shorter shipping times to East Asia compared to U.S. Gulf Coast exporters. Combined with Canada's stable political environment, high production standards, and growing output of natural gas liquids, this makes

Canadian propane highly attractive to global buyers seeking both reliability and low-emission fuels.

To capitalize on this opportunity and maximize export growth, the federal government should:

- **Enhance regulatory certainty and streamline permitting** for propane export infrastructure and terminals, ensuring timelines are predictable and supportive of private-sector investment.
- **Negotiate and maintain trade agreements** that remove barriers and secure long-term access to strategic markets in the Asia-Pacific region.
- **Promote Canadian propane abroad** through federal export promotion agencies, emphasizing its environmental advantages, such as lower life-cycle emissions and high efficiency in heating, transportation, and industrial use.

By advancing these measures, the federal government can help Canada diversify its energy export portfolio, reduce reliance on the U.S. market, increase national trade revenues, and support economic development across the propane supply chain. This will also enhance Canada's standing as a trusted global partner in the transition to cleaner energy.

Canada's propane industry

Canada's propane industry supports about 27,000 well-paying jobs in every region of the country while providing Canadians with an affordable energy choice. Canadians are employed in the propane industry in many roles, including extraction, production and refining, transportation and distribution, equipment manufacturing, sales, and marketing. Find out more: www.propane.ca.