

**Consultation on the *Free Trade and Labour Mobility in
Canada Act***

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Improving Labour Mobility and Free Trade in Canada for One Canadian Economy

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, I am pleased to share several recommendations to support the *One Canadian Economy Act* to reduce red tape, improve labour mobility and support the building of national interest projects. As a Canadian made energy, 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. Whether it be residential, commercial or industrial, propane is essential for providing affordable, mobile and versatile energy and heat on construction sites, on farms, for industry and in rural and remote communities across Canada.

Through new export terminals on the west coast of B.C., 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 and South Korea. Here at home, propane is an immediately deployable, cleaner-burning energy source than diesel or gasoline, 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 supporting our economy and providing energy across the country from coast to coast to coast. 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 efficiency with no added safety or security. 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.

In your consultation on the *Free Trade and Labour Mobility in Canada Act*, we encourage the consideration of our recommendations below as to the how the Act can be used to support the growth and economic development of industries such as propane. 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.

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: 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.

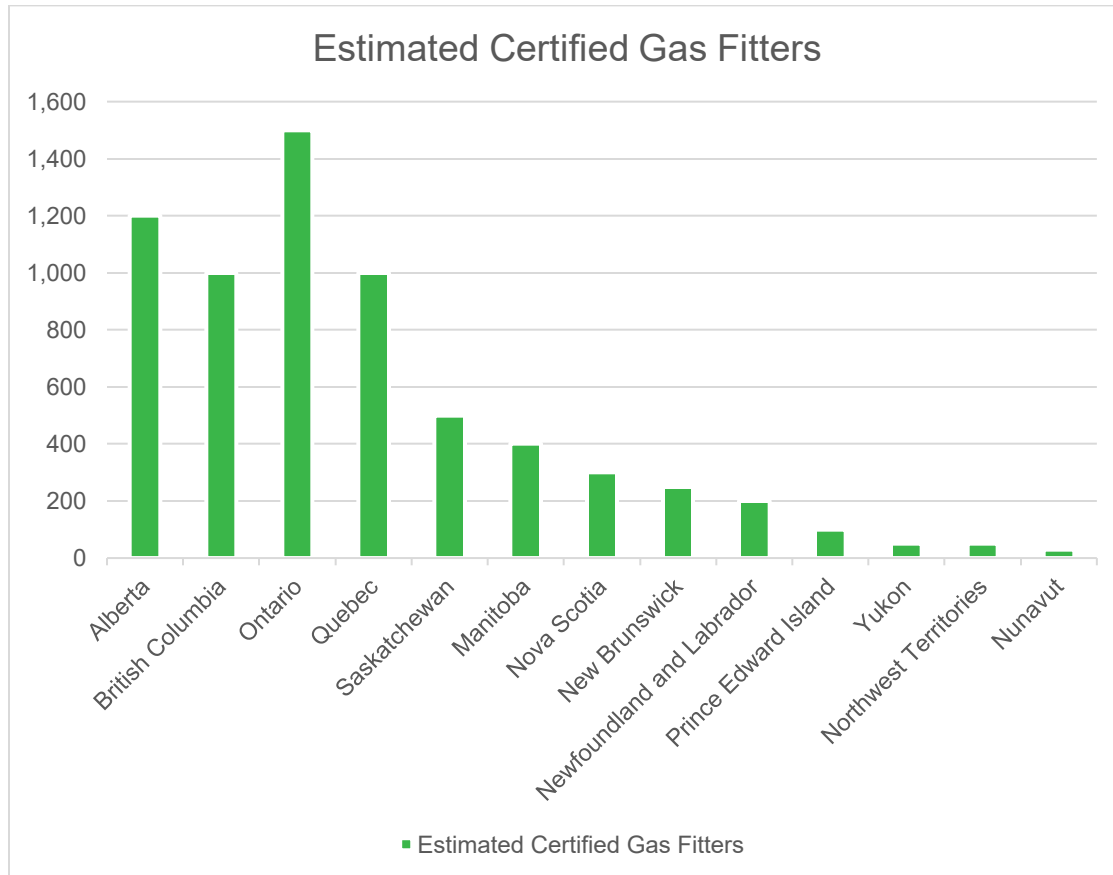
Canada's propane industry

Canada's propane industry supports about 21,000 well-paying jobs in every region of the country. 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

APPENDIX

Recommendation 1

As of the latest available data, specific numbers of certified gas fitters by province in Canada are not comprehensively published. However, estimates based on various sources provide the following approximate figures:



Sources:

- Job Bank Canada provides general information on gas fitter occupations, including job prospects and requirements, but does not specify numbers by province.
ab.jobbank.gc.ca+6jobbank.gc.ca+6on.jobbank.gc.ca+6
- The Red Seal Program outlines the standards for tradespeople in Canada, including gas fitters, but does not publish provincial certification numbers.
en.wikipedia.org+1en.wikipedia.org+1
- Provincial regulatory bodies, such as Technical Safety BC and the Technical Standards and Safety Authority (TSSA) in Ontario, oversee certification but do not publicly release detailed statistics.
jobbank.gc.ca+4on.jobbank.gc.ca+4skilledtradesbc.ca+4

Note: These figures are estimates and may vary