October 21st, 2026

Dear Members of the Committee,

Canada has set an ambitious agenda to attract investment, diversify Canada's trade relationships and strengthen long-term economic growth. Achieving those objectives will depend not only on expanding Canada's trade infrastructure, but on ensuring the transportation networks and supply chains that connect Canadian products to domestic and global markets remain reliable and predictable.

As organizations representing major users and operators of Canada's supply chains, we are writing to recommend a targeted amendment to Bill C-39 that would strengthen the federal government's ability to address labour disputes in exceptional circumstances.

Canada's transportation and supply chain stakeholders welcomed the recent Productivity Mega Deduction announcement. Permanent immediate expensing will help support the long-term investment needed to expand Canada's trade capacity and move Canadian goods to market.

But investment and trade growth also depend on a reliable supply chain, which Canada has not had in several years because of numerous work stoppages as the most significant factor. That is why we believe a targeted change is needed to Bill C-39's proposed amendments to section 107 of the *Canada Labour Code*.

Under the proposed framework, the Government can only intervene once a strike or lockout has begun. Given the broad and well-documented impacts of acute supply chain work stoppages across multiple sectors of the economy, this requirement does not address the risk of economic harm occurring before a work stoppage begins.

If Parliament entrusts the Government with the authority to protect the national interest in these exceptional circumstances, the Government should have the option to act before preventable economic and reputational damage occurs.

We recommend amending section 107 to allow the Government to intervene in exceptional circumstances, before a strike or lockout begins when collective bargaining has failed, the special mediator's report clearly indicates a work stoppage is imminent, and a work stoppage would cause significant economic harm to the national interest.

This approach would recognize the importance of collective bargaining and workers' rights while providing a mechanism to intervene in exceptional circumstances where a work stoppage will have a significant impact on national public interests.

Labour stability and efficient supply chains are essential to realizing the government's ambitions for investment, trade and economic growth. These recommendations are intended to strengthen the framework proposed in Bill C-39. We support the government's efforts to encourage earlier resolution of labour disputes and create a more predictable federal labour-relations system. The legislation already responds to several concerns raised by supply-chain sectors, including through special mediation, longer conciliation and clearer federal intervention authorities.

We believe this targeted amendment would strike the right balance between respecting collective bargaining and ensuring Canada has the tools needed to protect its economy, trade relationships and reputation as a reliable trading partner.

Sincerely,

Michael Flynn — Executive Director, Alberta Grains

Andre Harpe — Chair, Canadian Canola Growers Association

Laurie Frigon — President and CEO, Canadian Construction Association

Keith Currie — President, Canadian Federation of Agriculture

Olivier Lavigne-Lacroix — President, Canadian National Millers Association

Mark Walker — Executive Director, Canadian Oilseed Processors Association

Shannon Watt — President and CEO, Canadian Propane Association

Chris Davison — President and CEO, Canola Council of Canada

Derrick Hynes — President and CEO, FETCO

Michael Bourque — President and CEO, Fertilizer Canada

Derek Nighbor — President and CEO, Forest Products Association of Canada

John Corey — President, Freight Management Association of Canada

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Jill Verwey — President, Keystone Agricultural Producers Inc.

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Debbie Murray — President and CEO, National Maritime Group

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Eric Harvey — President and CEO, Railway Association of Canada

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