Association of Canadian Port Authorities | Association des administrations portuaires canadiennes

Strengthening One Canadian Economy through Trade and Transportation Discussion Paper

ACPA Response

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Introduction

The Association of Canadian Port Authorities (ACPA), representing Canada's 17 Canada Port Authorities (CPAs), appreciates the opportunity to provide input on Transport Canada's discussion paper, *Strengthening One Canadian Economy through Trade and Transportation*.

ACPA is encouraged by the federal government's commitment to strengthening Canada's trade and transportation system, improving supply chain efficiency, diversifying global trade opportunities, and modernizing Canada's transportation framework to support long-term economic growth and competitiveness. Canada's port authorities also recognize the importance of continued collaboration across the national port system while respecting the unique regional realities in which each CPA operates. This balance between collaboration and regional autonomy has allowed ports to remain agile, responsive, and capable of delivering solutions tailored to evolving operational, economic, and supply chain challenges across the country.

At a time of growing geopolitical uncertainty and intensifying global competition for trade, infrastructure investment, and supply chain resiliency, Canada's port authorities recognize the increasingly important role ports will play in supporting Canada's economic security, export diversification, and long-term trade competitiveness.

The discussion paper contains several promising initiatives that align with long-standing priorities raised by Canada's port authorities, particularly regarding financial flexibility, project approvals, supply chain modernization, digitalization, and improved coordination across trade corridors.

Financial Flexibility, Borrowing, and Partnerships

ACPA is particularly encouraged by the discussion paper's focus on improving financial flexibility for Canada Port Authorities, including more nimble borrowing approaches, expanded partnership opportunities, and broader revenue-generating authorities.

Canada's port authorities face significant infrastructure investment pressures as trade volumes grow, supply chains evolve, and Canada seeks to diversify global trade relationships. Greater flexibility to enter into partnerships, pursue joint ventures, develop inland terminals, and

expand commercial activities will be essential to ensuring ports can finance and deliver the infrastructure investments required to support Canada's economic and trade objectives.

ACPA has consistently advocated reforms that improve borrowing flexibility and facilitate collaboration between CPAs and private and public sector partners. These measures would improve ports' ability to respond to evolving market demands while supporting nationally significant infrastructure development.

ACPA also views positively the discussion around potential flexibility regarding the Gross Revenue Charge framework and encourages ongoing engagement on how federal revenue models can better support long-term investment capacity.

Given the federal government's ambitious goals to diversify Canada's global trade relationships, strengthen supply chain resilience, and expand the role of CPAs in achieving those objectives, it is essential that ports retain and deepen the financial flexibility needed to invest in infrastructure, modernization, environmental initiatives, Indigenous partnerships, and supply chain innovation. Regulatory and commercial certainty are also important to ensuring ports can maintain access to cost-effective financing, support long-term commercial planning, and continue advancing nationally significant infrastructure projects efficiently.

At the same time, ACPA believes it is important to preserve the regional autonomy and flexibility of Canada's port authorities. CPAs operate in distinct economic, geographic, and operational environments across the country, and this regional responsiveness has been central to their success as drivers of local and regional economic development. Any evolution of the legislative or regulatory framework should preserve ports' ability to respond to regional priorities and market conditions while continuing to support national trade objectives.

Infrastructure Funding and Project Approvals

Federal infrastructure funding programs have played an important role in supporting strategic trade and transportation projects across Canada. Programs such as the National Trade Corridors Fund have helped accelerate critical investments in port infrastructure and supply chain capacity. The recently announced $5 billion Trade Diversification Corridors Fund also promises to play a valuable role in the next phase of port and trade corridor development as Canada works to strengthen supply chain resiliency and expand international trade opportunities.

ACPA therefore supports the federal government's broader commitment to reducing delays and accelerating project approvals for transportation infrastructure.

In particular, the proposed Transportation Project Office has the potential to become an important mechanism for improving coordination across federal departments and streamlining permitting and approvals for transportation projects. Delays in project approvals remain one of the most significant barriers to expanding transportation infrastructure capacity in Canada.

Similarly, proposals to expand permitting responsibilities and authorities for CPAs, particularly for lower-risk and routine works, could significantly improve efficiency while maintaining strong environmental and safety standards. Canada's port authorities support efforts to reduce duplication, improve coordination, and streamline approvals while preserving robust oversight and regulatory integrity.

Digitalization, Data Harmonization, and Paperless Trade

ACPA fully endorses the federal government's focus on digitalization, supply chain visibility, and paperless trade.

Canada's port authorities enthusiastically back the establishment of a digital single window, harmonized data collection standards, and the proposed "Tell Us Once" reporting system to reduce duplication across departments and improve efficiency for industry stakeholders.

These initiatives are essential if Canada is to meet evolving international standards for digital trade and supply chain integration. Improved data harmonization and real-time supply chain visibility will strengthen Canada's competitiveness, enhance regulatory compliance, improve predictability for exporters and importers, and enhance the resilience of trade corridors.

Canada has committed internationally to many of these objectives, and ACPA appreciates the government's recognition that greater alignment with international standards is necessary to remain competitive in an increasingly digital global trading environment.

Coasting Trade Act Flexibility

ACPA believes that targeted flexibility under the Coasting Trade Act could provide important opportunities in emergencies, as proposed -- not just for marine trade but also in rare circumstances for cruise ships.

Another area to explore, would be barriers to development of transshipment and feeder opportunities that could support additional economic activity and improve the competitiveness of Canadian gateways.

Port Fees and Financial Autonomy

While Canada's port authorities are committed to transparency in rate setting and accountability to the community and port users, ACPA encourages caution regarding any proposals related to the regulation or oversight of port fee setting processes.

Canada's port authorities recognize that there is always a natural and healthy tension between ports and port users regarding rates and charges. That tension is inherent in any commercial relationship involving major infrastructure providers and their customers.

Port fees are essential to the safe operation, maintenance, modernization, and long-term sustainability of Canada's ports. Existing governance, transparency, and accountability mechanisms already provide opportunities for engagement, review, and oversight regarding port fees and charges. Additional processes that duplicate existing oversight mechanisms or create unnecessary administrative encumbrances risk reducing ports' ability to remain agile and responsive to operational requirements, infrastructure demands, and broader national trade and supply chain objectives.

Additional compliance mechanisms, restrictions on commercial flexibility, or measures that create uncertainty around cost recovery could undermine ports' ability to deliver critical infrastructure investments efficiently and respond quickly to evolving operational and market conditions.

Canada's port authorities already operate within a highly competitive international environment and require regulatory and operational flexibility to fulfill their mandates and support Canada's trade infrastructure objectives.

Governance Concerns

While the discussion paper introduces several new governance-related measures, ACPA notes the absence of any discussion regarding the long-standing issue of delays in federal board appointments for Canada Port Authorities.

This remains the single most significant governance challenge consistently identified by CPAs across the country. Recent survey results from ACPA members indicate widespread and persistent delays in federal appointment and renewal decisions, including for federally controlled user-designated positions. The results point to significant governance and operational impacts, including prolonged vacancies, increased workload on remaining directors, reduced board capacity, and challenges maintaining governance continuity and required skills matrices across CPA boards.

ACPA also notes that several proposals outlined in the discussion paper could significantly increase administrative and reporting requirements for port authorities. While accountability and transparency are important principles, care should be taken to ensure that any new requirements are proportionate, practical, and aligned with clearly defined policy objectives. Increased administrative burdens could have disproportionate impacts on smaller port authorities with more limited internal resources, potentially diverting capacity away from their core operational and economic development responsibilities.

In particular, ACPA encourages further discussion regarding the intended value and objectives of any new reporting or accountability requirements, including proposals relating to board governance and reporting responsibilities at the Chair level. Canada's port authorities already produce comprehensive annual reports and operate within a transparent accountability framework. Any additional reporting measures should therefore be designed to complement existing mechanisms, avoid duplication, and deliver clear operational or governance value.

ACPA would also support a careful review of how broader federal regulatory requirements, such as the Access to Information regime and Official Languages obligations, apply to Canada Port Authorities. Such a review should ensure that transparency and bilingualism objectives continue to be respected while also recognizing that CPAs operate within highly competitive commercial markets and must remain responsive, efficient, and operationally agile.

Conclusion

ACPA appreciates the direction and intent of the federal government's proposed reforms and values the opportunity to contribute constructively to this important work.

Canada's port authorities look forward to continued engagement with Transport Canada on measures that strengthen Canada's trade infrastructure, improve supply chain competitiveness, accelerate infrastructure development, and support long-term economic growth and trade diversification.