Association of Canadian Port Authorities | Association des administrations portuaires canadiennes

ACPA Submission on Building Canada Strong for All – Powered by Canada's Workers

June 2026

The Association of Canadian Port Authorities (ACPA), representing Canada's 17 Canada Port Authorities (CPAs), is pleased to provide comments in response to the federal government's consultation document, "Building Canada Strong for All – Powered by Canada's Workers."

ACPA is encouraged by the federal government's commitment to diversify and strengthen Canada's global trade by improving supply chain efficiency and supporting long-term labour stability to advance long-term economic growth and competitiveness. Canada's port authorities recognize the increasingly important role ports play in supporting Canada's economic security, trade diversification, and long-term trade competitiveness in an increasingly uncertain global trading environment.

ACPA welcomes the federal government's recognition that there is a need to strengthen and modernize the federal labour relations framework as a fundamental component of this work. We also welcome the federal government's acknowledgement that prolonged labour disputes in key federally regulated sectors have already had significant economic and reputational consequences for Canada.

While Canada Port Authorities are not parties to collective bargaining between employers and unions at marine terminals, CPAs have a statutory responsibility to ensure the efficient movement of trade and the continued operation of critical marine infrastructure. Accordingly, ACPA's comments are offered from a national supply chain and trade system perspective, focused on the broader economic and operational impacts of labour disruptions rather than the interests of any bargaining party.

The 2023 labour disruption at West Coast ports demonstrated the scale of these impacts. The disruption resulted in vessel diversions, major supply chain congestion, manufacturing slowdowns, and lasting reputational damage to Canada's trade gateways. Similar impacts were experienced during labour disruptions at the Port of Montreal in 2020 and 2021. Even after operations resumed, congestion and uncertainty persisted for months. Meanwhile, the 2023 work stoppage on the St. Lawrence Seaway resulted in the loss of up to $100 million per day in economic activity across Canada and the United States. The closure also risked the continued

employment of approximately 67,000 people directly or indirectly employed by activity through the St. Lawrence Seaway System in Canada and the United States.[1]

These disruptions demonstrated that the effects of labour disputes extend well beyond the immediate parties involved. Even relatively short disruptions can create prolonged congestion, shift cargo to competing gateways, delay investment decisions, and weaken Canada's reputation as a dependable trading nation. These experiences underscore the importance of ensuring that Canada's labour relations framework promotes both fair bargaining and supply chain reliability.

Canada's ports compete internationally for cargo and investment. Beyond the direct impacts of individual work stoppages, repeated labour uncertainty erodes confidence among global shipping lines, cargo owners, investors, and supply chain partners. Trade decisions are increasingly influenced by perceptions of reliability and predictability. When uncertainty becomes a recurring feature of Canada's transportation system, cargo and investment may be redirected to competing gateways where supply chain risk is perceived to be lower. Ensuring long-term labour stability at Canada's ports is therefore critical to maintaining Canada's trade competitiveness, economic security, and reputation as a reliable trading partner.

ACPA therefore supports efforts to modernize the collective bargaining framework in a manner that continues to respect collective bargaining rights while improving predictability, encouraging timely dispute resolution, and protecting Canada's broader economic interests.

Measures to Strengthen the Collective Bargaining Framework

ACPA's observations are focused on system performance, predictability, and economic resilience. ACPA supports several of the measures identified in the consultation document, particularly proposals intended to encourage earlier engagement between parties, reduce uncertainty during bargaining, and improve dispute resolution mechanisms.

Revising Timelines for Direct Bargaining, Conciliation, and Cooling-Off Periods

The current framework can permit bargaining processes to continue for extended and uncertain periods before formal mediation or conciliation mechanisms are engaged. This creates prolonged uncertainty across supply chains and reduces confidence among international customers and investors.

ACPA supports examining clearer and more structured timelines for bargaining, conciliation, and cooling-off periods. Greater predictability in the process would encourage earlier engagement by parties, incentivize timely resolution of disputes, and provide greater certainty to supply chain stakeholders.

[1] According to the Chamber of Marine Commerce.

ACPA supports consideration of measures that improve predictability and transparency in bargaining timelines, as well as approaches that encourage earlier engagement between parties and facilitate timely dispute resolution. The federal government should consider mechanisms that provide a clearer understanding of the broader economic consequences of disruptions affecting nationally significant trade infrastructure.

Creating a Special Mediator Role

ACPA supports the exploration of a dedicated special mediator role for disputes involving nationally significant supply chain infrastructure.

Complex labour disputes affecting ports, rail, and other key trade infrastructure can have impacts that extend well beyond the immediate parties involved. A specialized mediator with expertise in national supply chains and transportation infrastructure could help facilitate earlier resolution and improve communication between parties.

Reviewing Section 107 and Related Authorities

The federal government should review whether existing authorities under section 107 of the Canada Labour Code remain appropriate and sufficiently responsive to modern supply chain realities.

The economic consequences of prolonged disruptions to nationally significant trade gateways can escalate rapidly. The federal government should ensure that legislative tools and intervention mechanisms are sufficiently clear, predictable, and effective in situations where prolonged disruptions pose significant risks to the national economy.

Additional Measures for Consideration

In addition to the measures identified in the consultation document, ACPA encourages the federal government to consider several additional policy approaches previously recommended in submissions relating to longshoring labour disputes.

Preserve Existing Mechanisms

Any changes to the legislative framework should preserve the simplicity and accessibility of existing mechanisms, particularly with regard to the designation of essential services. Indeed, the ability to quickly and clearly identify functions whose interruption could jeopardize public health or safety is paramount.

A clear, predictable, and administratively light framework promotes both public safety and good labour relations, while minimizing the impact on supply chains and the Canadian economy.

Economic Impact Assessments

The federal government should consider requiring formal economic impact assessments during significant labour disputes affecting nationally critical infrastructure.

These assessments should incorporate independent, evidence-based analysis from neutral third parties and evaluate impacts on national supply chains, exporters, importers, manufacturing operations, consumers, and Canada's international trade reputation.

A more structured understanding of broader economic impacts would support informed decision-making by all parties and help ensure that wider national interests are appropriately considered during disputes.

Strengthened Mediation and Arbitration Mechanisms

ACPA supports strengthening mediation and arbitration mechanisms to facilitate timely dispute resolution and encourage good-faith bargaining.

The federal government should examine whether additional tools or incentives could reduce the likelihood of prolonged labour disruptions while preserving the integrity of the collective bargaining process.

Proportional Response Provisions

ACPA encourages consideration of whether the Canada Industrial Relations Board should have additional authority to assess proportionality in industrial actions and responses.

Such an approach could help limit escalation during disputes while maintaining fairness for bargaining parties.

Permanent Labour-Management Committees

The federal government should consider encouraging or facilitating permanent labour-management committees within sectors that are critical to national supply chains.

Ongoing dialogue outside periods of active bargaining can help build trust, identify emerging issues earlier, and reduce the likelihood of disputes escalating.

Supporting Canada's Trade and Economic Objectives

The federal government of Canada has appropriately emphasized the importance of strengthening Canada's economic resilience, trade corridors, and nation-building infrastructure.

Achieving these objectives will require a labour relations framework that supports both fair collective bargaining and long-term labour stability across nationally significant supply chain infrastructure.

Canada’s ports are central to the country’s economic future, including trade diversification efforts, major project development, energy exports, manufacturing supply chains, and agricultural trade. Labour instability at key gateways undermines these broader national objectives and weakens Canada’s competitiveness.

ACPA therefore supports policy measures that:

* Improve long-term labour stability and predictability;
* Encourage earlier and more effective dispute resolution;
* Reduce the risk of prolonged supply chain disruptions;
* Protect Canada’s international trade reputation; and,
* Maintain respect for collective bargaining rights.

Conclusion

ACPA and its member Canada Port Authorities remain committed to working collaboratively with federal government, labour organizations, terminal operators, and supply chain stakeholders to support a stable, resilient, and competitive Canadian port system.

Canada’s ports are essential to national prosperity and economic sovereignty. As Canada seeks to strengthen its position as a reliable trading nation, it is critical that the federal labour relations framework evolves to reflect the realities of modern supply chains and nationally significant trade infrastructure.

Maintaining confidence in Canada's trade corridors requires a labour relations framework that promotes stability, predictability, and timely dispute resolution while continuing to respect collective bargaining rights