Association of Canadian Port Authorities | Association des administrations portuaires canadiennes

Submission to the Department of Finance for the Pre-Budget Consultations in Advance of the Upcoming Federal Budget

The Association of Canadian Port Authorities
August 5, 2026

The Association of Canadian Port Authorities recommends the following to the Department of Finance, recognizing Finance's key role in enabling borrowing capacity, capital mobilization, and financial policy conditions in support of Canada's ports to support nationwide economic prosperity:

1. **Enhance port financial agility to attract and leverage private capital for critical investments through nimbler borrowing processes.**
2. **Accelerate project approvals through regulatory reform.**
3. **Unleash port potential through partnerships and expanded activities.**
4. **Increase funding to support CBSA's trade facilitation mandate.**

INTRODUCTION

The Association of Canadian Port Authorities (ACPA) — the voice of the country's 17 Canada Port Authorities (CPAs) — is pleased to present its recommendations for the 2026 federal budget to the Department of Finance. With respect to the department's responsibility in shaping fiscal and financial frameworks to enable national infrastructure investment, ACPA is making several recommendations to ensure CPAs can borrow, invest and expand in ways that support Canada's long-term economic prosperity and security.

As Canada advances an ambitious economic agenda focused on trade diversification, supply chain resilience, and productivity growth, ports serve as critical gateways connecting Canadian businesses to global markets. Given their strategic importance, ensuring that CPAs can fully contribute to these national objectives will require complementary legislative, regulatory, and financial measures. The department of Finance's support will be essential to aligning federal borrowing rules, capital investment tools, and budget measures with the scale of infrastructure required to move goods efficiently across the country and beyond.

A 2024 infrastructure needs report conducted by InterVistas Consulting indicates that between $15 billion and $21.5 billion in port infrastructure investment will be required by 2040 to meet projected trade demand.[1] Addressing this infrastructure gap will require a combination of public policy reform and the mobilization of private capital.

The government's Ports Modernization Review recognized that adjustments to governance and financial management are needed to unlock greater performance, efficiency, and productivity. To empower CPAs to support Canada's economic priorities, ACPA proposes the following targeted measures.

1. Enhance Port Financial Agility to Attract and Leverage Private Capital for Critical Investments

Recommendation: Introduce higher dynamic borrowing limits based on updated debt-coverage frameworks and streamline approval processes.

[1] https://acpa-aapc.ca/wp-content/uploads/2026/04/ACPA-Port-Infrastructure-Needs-Assessment-Final-Report-English-Jan-31.pdf

Building the port infrastructure required to support Canada's trade agenda will require significant investment; however, Canada's port authorities face a borrowing framework that constrains their ability to access private capital. The current system, based on static borrowing limits set in Letters Patent, is often misaligned with commercial realities and limits the ability of CPAs to self-finance infrastructure projects. The departments of Transport and Finance play a key role in modernizing the financial authorities and investment conditions that determine whether port authorities can scale infrastructure at the pace Canada's economy requires.

Raising borrowing limits requires lengthy federal review processes that delay project timelines and increase costs. This creates uncertainty for investors and limits the ability of ports to respond to market opportunities. Introducing higher, more dynamic borrowing limits that reflect recent earnings performance and future potential would improve financial capacity and reduce reliance on federal funding. By enabling more flexible borrowing authorities, the Government of Canada can help unleash responsible, revenue-supported investment without requiring ports to rely primarily on direct federal appropriations.

2. Accelerate Project Approvals through Regulatory Reform

Recommendation: Prioritize port infrastructure projects as national interest projects and extend regulatory reform to all project approvals and permitting processes.

ACPA applauds the federal government's commitment to accelerate project approvals, including the use of the federal Major Projects Office and two-year timelines. As the federal government has recognized, ports are natural candidates for prioritization given their central role in enabling exports, securing supply chains, and supporting economic growth.

While recent moves toward reform are positive, improvements are required for projects beyond those designated as nationally significant, across all permitting processes, to ensure timely and predictable outcomes across the economy. Canada's port authorities have been pleased to see this acknowledged by federal officials; accelerating approvals will strengthen investor confidence and enable Canada to deliver critical infrastructure more efficiently.

3. Unleash Port Potential through Amendments to the Canada Marine Act

Recommendation: Modernize the Canada Marine Act to expand activities, enable partnerships, and introduce timelines for federal board appointments.

Modernization of Canada's port system requires greater flexibility for CPAs to generate revenue and pursue partnerships. Expanding the scope of permissible activities would strengthen port financial capacity and reduce reliance on federal funding.

Meanwhile, current legislative and policy rules limit the ability of CPAs to participate in and capitalize some joint ventures and subsidiaries, such as those with Indigenous groups. This is an opportunity to support growth by allowing ports to generate more revenue and reinvest it in infrastructure that advances trade, productivity, and regional economic development. Canada's port authorities are encouraged to see the federal government signal its intent to address these concerns in its May discussion paper Strengthening One Canadian Economy through trade and transportation.

In addition, delays in federal board appointments have been a long-standing issue that affects CPA governance and decision-making. ACPA is encouraged by recent comments from senior transport officials that this concern is recognized and will be addressed. One systemic solution would be to put a time limit on the appointment of directors, allowing CPAs to proceed with qualified candidates they have identified after a deadline has passed

4. Increase Funding to Support CBSA's Trade Facilitation Mandate

Recommendation: Increase funding to CBSA to expand trade facilitation capacity and infrastructure.

To maintain Canada's competitiveness and meet trade diversification growth, the Canada Border Services Agency must balance security with trade facilitation. Limited inspection capacity, outdated technology and uneven service coverage create inefficiencies and bottlenecks in key trade corridors. CBSA should also be encouraged to explore regulatory reforms that could make the agency nimbler in how it fulfills its important mandate.

Expanding examination capacity, modernizing digitalization and technology, and improving coordination with port authorities will enhance supply chain fluidity and reinforce Canada's reliability as a trading partner.

CONCLUSION

Canada cannot build the competitive and resilient economy it needs to survive and thrive without modern, efficient, and financially empowered ports. The recommendations outlined in this submission will unlock private capital, accelerate infrastructure delivery, and strengthen Canada's position in global trade. With the Department of Finance's support in enabling appropriate borrowing capacity and policy flexibility, Canada's port authorities can expand their role as drivers of nationwide economic prosperity.

On behalf of Canada's 17 port authorities, ACPA thanks the Department of Finance for its continued attention and stands ready to support implementation of these recommendations through Budget 2026 and beyond. Finance's support in our recommendations will be critical to ensuring ports have the financial tools, borrowing flexibility, and investment conditions needed to deliver infrastructure that strengthens Canada's economy here and with partners abroad.

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