

**March 17, 2025**

**The Canadian International Trade Tribunal**

333 Laurier Avenue West  
17th Floor  
Ottawa, Ontario  
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Dear Members of the Canadian International Trade Tribunal,

We are writing to provide input regarding the ongoing investigation into the importation of container chassis from Vietnam and to express our concerns about the findings issued by the Tribunal on February 18, 2022. We wish to reiterate the significant issues raised by industry stakeholders, which we believe continue to be relevant and have become more pressing in the current market situation.

**Market Domination by Max-Atlas and Potential Near-Monopoly**

One of the critical concerns highlighted in the Tribunal's 2022 findings is the dominance of Max-Atlas in the Canadian container chassis market. We strongly believe that the imposition of duties on container chassis from China has created an environment where Max-Atlas now occupies an overwhelming position, effectively resulting in a near-monopoly. This market concentration is detrimental to competition, limiting consumer choice, and leading to higher prices, all of which ultimately harm Canadian businesses and end consumers.

**Inability of Max-Atlas to Meet Current Demand**

Although Max-Atlas holds a dominant position in the Canadian market, it is clear that they are unable to meet the current demand for container chassis in Canada. This shortfall has become particularly evident as they continue to export a significant number of chassis to the United States. This practice exacerbates the supply chain constraints in Canada, leaving Canadian businesses unable to access the chassis they need to operate efficiently and expand their operations. We urge the Tribunal to consider this disparity and the impact it is having on Canadian businesses.

**Importance of Container Chassis in Alleviating Supply Chain Bottlenecks**

Container chassis are critical to the smooth functioning of Canada's transportation and logistics sectors. In recent years, the demand for container chassis has surged, driven by the need to alleviate supply chain bottlenecks, particularly as global trade volumes increase. The restrictions on importing container chassis from overseas markets have only worsened this situation, limiting available supply and preventing the Canadian market from fully addressing these supply chain challenges.

**Price Increases Since 2022 Ruling**

Since the 2022 ruling, the price of container chassis in Canada has increased significantly, which

can largely be attributed to the near-monopoly situation created by the imposition of duties and the limited availability of imports from overseas markets. The cost of chassis has become a substantial burden on Canadian businesses, further compounding the challenges faced in maintaining competitive and efficient operations.

Considering these points, we urge the Canadian International Trade Tribunal to carefully reconsider the impact of these import restrictions and duties on the Canadian market. We believe that the current market conditions are unsustainable and detrimental to Canadian businesses, and that a fair and balanced approach is required to ensure a competitive market, alleviate supply chain pressures, and support the long-term health of Canada's economy.

We appreciate your attention to these concerns and look forward to your continued work on this critical issue.

Sincerely,



Bruce Rodgers

Executive Director, CIFFA



Julia Kuzeljevich

Director, Policy and Regulatory Affairs, CIFFA