

January 21, 2025.

The Honourable Anita Anand  
Minister of Transport and Internal Trade  
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re: Request for Inclusion of CIFFA in Security Measure Notifications

Dear Minister,

We are writing to request your intervention to create a more effective process around transportation security in Canada with regard to communicating more broadly about security measures directly affecting industry.

Just prior to Labour Day 2024, first the United States and then Canada responded to a credible threat concerning cargo flights, instructing the aviation industry to take new measures to ensure airlines had proof of established relationships with the forwarders and their exporters before the loading of North American destined cargo. Consistent with your department's interpretation of the Aeronautics Act, it issued direction to the air carriers exclusively. Each carrier was obliged to instruct its customers on the measures, independently.

The result was myriad different instructions from airlines to the forwarders and exporters ranging from some carriers unnecessarily refusing cargo to others indicating no change of normal practices was necessary. In some cases there were significant financial losses, in other cases a failure to enact the measures the government had ordered.

As you will understand, it should be the role of our association, CIFFA, to ensure that all freight forwarders – who handle about 80% of Canada's import cargo – have consistent, clear notification of security rules.

Transport Canada argues that the Aeronautics Act specifies only the airlines may be informed of these security measures. But our review of the Act, especially sections 4.72 and 4.82, does not restrict the parties the department may consult to ensure rapid and accurate dissemination of new measures. Indeed paragraph **(5)** of 4.72 says: *"Before making a security measure, the Minister must consult with any person or organization that the Minister considers appropriate in the circumstances."* We respectfully suggest that should include CIFFA.

In the United States the notification was provided to carriers *and* the freight forwarders associations such as the Airforwarders Association, and many other stakeholders involved in air transport, which ensured that all parties involved in the shipment were informed. On September 12 FIATA, the International Federation of Freight Forwarder Associations, posted a detailed notification of the new security requirements, on air cargo transitioning through the U.S. and Canada.

On that same day Transport Canada ordered CIFFA to *remove* our notification for our own members, in an internal member newsletter. In fact, Transport Canada made several calls to CIFFA to have us edit material that had already been widely distributed in airline releases and industry publications, but refused to answer our questions about the directives and confusion that had ensued.

In a recent press conference the head of cargo for the International Air Transport Association (IATA) described the response to the Labour Day threat as “disjointed” and “not appropriately developed or coordinated at an international level.” He didn’t specifically mention Canada, but he certainly could have.

In the interest of enhancing security and ensuring consistency, we kindly request that your department extend notification of new security measures to the Canadian International Freight Forwarders Association (CIFFA). CIFFA believes that being directly involved in receiving the necessary directives and instructions will enable us to play a more active role in supporting and facilitating the implementation of these security measures in an efficient manner.

Your collaboration in this matter would be greatly appreciated, as it will help ensure that we are all aligned in our efforts to maintain and strengthen security protocols.

Thank you for considering our request. We look forward to your response.

With best wishes,



Bruce Rodgers

Executive Director, CIFFA



Julia Kuzeljevich

Director, Policy and Regulatory Affairs, CIFFA