

May 4, 2026

The Honourable Patty Hajdu, P.C., M.P.
Minister of Jobs and Families
The Honourable John Zerucelli
Secretary of State (Labour)

Sent via email: esdc.nc.labour.consultations-travail.nc.edsc@hrsdc-rhdcc.gc.ca

RE: BUILDING CANADA STRONG FOR ALL – THE CONSTRUCTION SECTOR NEEDS LABOUR AND SUPPLY CHAIN STABILITY

Dear Minister Hajdu and Secretary of State Zerucelli,

On behalf of the more than 4,500 construction and resource companies that make up the Independent Contractors and Businesses Association (ICBA), I write in response to the federal government’s consultation on modernizing Canada’s labour framework – and to urge you to act decisively on labour and supply chain stability before the next round of West Coast port and rail bargaining begins this fall.

ICBA is Canada’s largest construction association. Our members build the homes, hospitals, schools, roads, bridges, transit, ports, pipelines, mines, LNG facilities, and critical infrastructure that move Canada forward. We employ tens of thousands of skilled tradespeople across British Columbia and Alberta, and our sector is directly exposed – every single day – to the reliability of the country’s federally-regulated supply chain.

The 2023–24 Disruptions Hit Construction Hard

In a 16-month span in 2023-24, waterfront operations and the associated rail and trucking at Canada’s West Coast ports experienced 24 days of shutdowns, disrupting an estimated \$19.2 billion worth of cargo.

For ICBA members, that wasn’t an abstract trade statistic – it was structural steel sitting on a dock instead of going up on a job site. [When we surveyed our members in late 2023](#), 62% said they were having supply chain challenges, and were forced to deal with it in different ways:

- 79% said projects were delayed
- 56% said they increased prices
- 23% said they turned down other work

Modern construction in Canada depends on imported inputs: structural steel and rebar, glazing, elevators, mechanical and electrical equipment, HVAC systems, fixtures, cement components, and specialty fasteners. The vast majority of these inputs reach B.C. and other Western Canadian projects through the Port of Vancouver and Prince Rupert Port. When the ports stop, our members’ projects stop. Crews stand down. Schedules slip. Liquidated damages clauses get triggered. Carrying costs on land and financing pile up. And the cost of every delay is, ultimately, paid by the Canadians buying a home, the taxpayers funding a school, or the investors backing a project.

Major Projects Cannot Be Built on Unreliable Supply Chains

Canada has spent the last year selling the world a story: that we are open for business, that we will build major projects again, and that we are a serious, reliable trading partner. Our members are the ones being asked to deliver on that promise – on LNG export terminals on the North Coast, on critical-mineral mines in B.C. and Alberta, on the federal government’s own nation-building infrastructure, on the housing supply this country desperately needs, and on the energy and transportation projects required to reach new global markets.

These (and many other) projects depend on imported materials and equipment that arrives in modules, on schedules planned years in advance. A single 13-day port shutdown, at a critical time in the construction cycle, can push a project past a winter window and add a full year of cost. Investors and owners notice. Every disruption adds a “Canadian risk premium” to the next project decision – and that premium gets paid in jobs and capital that go elsewhere.

If Canada wants to be a country that builds again and that is viewed as a trading powerhouse and reliable commercial partner, the federal government must ensure the country can keep building when it matters most.

The Status Quo Is Not Working – And Pretending Otherwise Is Not an Option

We understand some submissions to this consultation will argue there is no problem to solve. With respect, that is not the experience of the businesses that actually move goods through this country. Two consecutive years of port shutdowns and a rail work stoppage that required emergency federal intervention are not the marks of a system that is working effectively. They are the marks of a system that has run out of off-ramps.

The next round of bargaining at the West Coast ports and at CN and CPKC is now about seven months away. Canadians cannot afford a third consecutive set of disruptions. Builders cannot price the risk. Trading partners are already asking us – directly – whether Canadian supply chains can be relied upon.

The government’s modernization of the *Canada Labour Code* is the right vehicle, at the right time, to help fix this.

Recommendations

ICBA strongly endorses the following measures for inclusion in the modernization of Canada’s labour framework:

1. The development of new dispute resolution mechanisms, applied equally to all parties, to assist in situations where collective bargaining has become intractably deadlocked and where the national interest is at stake. Such mechanisms would support the government’s broader objectives related to trade diversification, internal trade, energy sovereignty and security, and investment in major projects.
2. The urgent adoption of two key recommendations from the expert Industrial Inquiry Commission on West Coast Ports:
 - a. The application of geographic certification of unions along West Coast ports; and

- b. The creation of a special mediator to assist parties in achieving successful negotiations.
We note that this could be expanded to apply across all federally regulated industries.

Together, these measures would deliver greater stability, predictability, and resilience in Canada's federally-regulated labour system – while continuing to balance the legitimate interests of workers, employers, and the broader Canadian public.

Build Canada. Don't Let the Docks Stop You.

Our members want to build for Canada. They want to deliver the housing, the infrastructure, the energy projects, and the trade-enabling capacity this country needs. But they cannot build on a foundation of supply chain uncertainty, and Canada cannot credibly pitch itself as a reliable trading partner while goods sit idle on West Coast docks for weeks at a time.

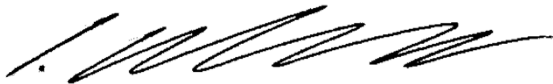
The status quo is not an option. The time for action is now.

Thank you for the opportunity to contribute to this important consultation. ICBA stands ready to support the government's work on this file, and we are available at your convenience to discuss any of the points above.

ICBA wants to help build Canada strong. Give our members – and Canada's supply chain – the certainty to do it.

Sincerely,

INDEPENDENT CONTRACTORS AND BUSINESSES ASSOCIATION



Chris Gardner
President and CEO