

April 8, 2020

Hon. Jean Yves-Duclos, P.C., M.P.
President of the Treasury Board
90 Elgin Street, 8th Floor
Ottawa, Ontario
K1A 0R5

Dear Minister:

On behalf of the hundreds of thousands of businesses of all sizes across the country, we appreciate your government's continued engagement with the private sector as we deal with the health and economic impacts of the COVID-19 crisis.

We would like to flag an area of particular concern where we believe urgent action is needed. On March 25 (see the attached statement), more than 60 industry associations asked all levels of government to postpone all non-essential new regulations and unnecessary consultations that would detract from our members' ability to manage the current crisis.

As you are no doubt aware, the future of many thousands of Canadian businesses is at stake. One way to help them survive is to allow them to focus their energies on responding to immediate challenges, leaving others to be dealt with after the crisis has passed.

Unfortunately, federal regulatory initiatives continue unabated. Several departments and agencies have pre-published regulations for industry comment in Canada Gazette I, or have published final regulations scheduled to come into force in the coming months in Canada Gazette II. This includes: Health Canada; Transport Canada; Finance Canada; Public Safety and Emergency Preparedness Canada; Labour, Employment, Workforce Development & Disability Inclusion; Environment and Climate Change Canada; and the Canadian Food Inspection Agency

In the current environment, individual businesses and industry associations such as ours do not have the capacity to respond adequately to ongoing regulatory consultations. If they proceed, these initiatives will go forward without the benefit of industry evidence and intelligence. As for regulations scheduled to come into force in the coming months, our

members will not be able to implement new compliance requirements due to limited capacity and logistical challenges associated with global supply chains.

It is essential that the Treasury Board Secretariat provide clarity and direction to federal regulators to pause these measures until businesses and departments/agencies are in a better position to manage them.

Similarly, we strongly encourage federal departments and agencies to suspend the collection of user fees that are not activity-based. Doing so would increase business cash flow and support business survival in this exceptionally challenging economic environment.

Thank you for your efforts in support of Canadian businesses. Should you require additional information about this urgent request, please do not hesitate to let us know.

Sincerely,



Hon. Perrin Beatty, P.C., O.C.
President & CEO
Canadian Chamber of Commerce



Tabatha Bull
President & CEO
Canadian Council for Aboriginal
Business



Goldy Hyder
President & CEO
Business Council of Canada



Dennis A. Darby, P.Eng., ICD.D
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Dan Kelly
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