

United Steelworkers submission to Global Affairs Canada (GAC) for the consultation on *potential new measures to advance and defend Canada's economic security interests.*



Submission of United Steel, Paper, Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (“The United Steelworkers” or “USW”)

September 23, 2024

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USW thanks Global Affairs Canada (GAC) for the opportunity to comment on *potential new measures to advance and defend Canada's economic security interests*. USW has already commented extensively on these matters in previous submissions to both GAC and the Department of Finance, including submissions on trade and investment agreements, on the need for legislated corporate accountability along supply chains, and on trade remedy reform.

USW believes Canada must develop a comprehensive industrial policy and strategy focused on the shift to a decarbonized economy and that Canada's trade policy should not undermine domestic job creation and climate goals.

Canada must proactively build an industrial policy that supports its manufacturing sector as it decarbonizes. A comprehensive industrial policy should also bolster supply chains, while protecting and developing our comparative and competitive advantages in critical minerals, metals, mining, resource extraction and forestry. We must also ensure we have the policies in place to build a robust value-added and cleaner manufacturing sector. The creation and maintenance of good, community-sustaining jobs must form the basis of this policy.

Canada must also pursue a trade and tariff policy that supports a targeted and specific use of tariffs and non-tariff measures to ensure the integrity of our key strategic domestic industries and sectors. We must strengthen our trade remedy system and stop negotiating trade and investment agreements that prioritize access to cheap goods, labour and services. Most importantly, our trade policy should enhance, rather than undermine, our ability to protect and develop our strategic and high value added manufacturing and industrial sectors.

In consideration of the foregoing general concerns, this submission focuses on Canada's vital steel industry and critical minerals sectors. We suggest that Canada can adapt its trade policies to promote and protect these industries. Canada's trade policy can also do more to encourage an ambitious new industrial policy that puts workers first. This submission also identifies several areas, such as procurement, trade remedies, and carbon import surtaxes, among others, where we believe Canada can make significant advances to defend our economic security interests.

Towards a Green Industrial Policy – “Buy Clean” and “Buy Canadian”

USW believes that the federal government should not be afraid to pursue domestic policies and measures that increase domestic demand and grow our clean manufacturing sector. USW advocates for “Buy Clean” and “Buy Canadian” procurement policies, which will increase demand for Canadian industrial products that provide good jobs for Canadians. USW has already articulated this position in our May 2022 and July 2023 submissions to GAC as well as in our August 2024 Pre-Budget Consultations submitted to the Department of Finance Canada.

To summarize, “Buy Clean” policies with emissions requirements incentivizes the use of lower carbon steel, concrete, aluminum and wood. These are the basic materials needed to build the green economy of the future. When produced in Canada, these materials typically have lower embodied carbon than imported materials.¹ A “Buy Clean” approach should be tied in with other

¹ Emissions from steel made in Canada from electric arc furnaces are three times lower than from China, while aluminum produced in Canada is the cleanest in the world, according to Global Efficiency

climate and jobs initiatives, including those related to the federal government's *Sustainable Jobs Plan*.

"Buy Clean" will require a multijurisdictional framework for implementation and coordination with provinces and municipalities. This will ensure that sustainability criteria are considered in all federal procurement and transfers to provinces for large infrastructure projects. A "Buy Clean" strategy thus provides a steady source of demand for producers of basic construction materials, while securing well-paying jobs in Canada. A "Buy Clean" procurement strategy also requires adequate funding for education and capacity-building, and the development of incentives for provinces, territories and municipal governments to encourage and enforce implementation.

In the case of public infrastructure projects, USW believes domestic procurement rules should favor the use of Canadian-made steel. The public sector is a large consumer of steel; it accounts for roughly 30% of steel purchased in Canada. However, too many public dollars are spent to purchase foreign made steel.² Canada must leverage comparatively low-carbon steel not only in public infrastructure projects, but also in private infrastructure projects. This could take the form of low-carbon steel and embodied carbon requirements in construction projects³.

Finally, USW asserts that the federal government should be able to exclude bids from suppliers that cannot prove their supply chain is free from human and labour rights violations including the use of forced or child labour. Federal transfers for provincial and territorial infrastructure and social services procurement should come with similar requirements attached.

Building an industrial strategy to develop and protect our critical minerals supply chains

As global competition intensifies, access to and control over the mining and processing of critical minerals will become crucial to Canada's ability, along with our allies, to transition to a clean and sustainable economy. USW represents nearly 20,000 Canadians in the mining sector with over half of these members working in the mining and processing of critical minerals⁴. We therefore have a keen interest in ensuring Canadian natural resources are well-managed.

Canada is abundantly rich in critical minerals but in many critical minerals segments it has largely been unsuccessful in further developing value added manufacturing and final product manufacturing.⁵ Canada primarily exports smelted and refined intermediate products and imports semi-finished and finished goods. In 2022, Canada had a trade surplus in primary

Intelligence <https://www.globalefficiencyintel.com/steel-climate-impact-international-benchmarking-energy-co2-intensities>

² For instance, in 2018 the CBC reported that 17% of the steel for the new Arctic and Offshore Patrol Ships was sourced from China alone in addition to other European suppliers. In 2019 the federal government exempted dumping duties on Chinese fabricated steel for two LNG projects in BC in a project worth \$42 billion.

³ For more information on using standards on embodied carbon in construction projects, please see "Lessons from the United States on "Buying Clean" and recommendations for Canada. Clean Energy Canada. 2022.

⁴ Nickel, Copper, Potash, Zinc, Uranium, Bismuth, Gallium, Titanium and Tantalum

⁵ Specifically, in Stage 3, the production of semi-fabricated products and Stage 4, further processed products and final goods

mineral products and smelting and refining products of \$44.6 and \$23.9 billion, respectively. In the production of semi-fabricated mineral products and fabricated products, Canada had a trade deficit of \$9.7 and \$27.8 billion, respectively.⁶

To deepen Canadian critical minerals supply chains and reverse our trade deficit in the production of semi-fabricated and final products and goods, the federal government should continue to encourage and assist in the expansion of these value-added production processes. We recognize the investments already made to deepen the EV battery and automotive supply chain. These programs should be maintained and enhanced and they should also be extended to the domestic manufacture of wind turbines and solar panels. Canada should also look to adapting its trade and tariff policy regarding critical minerals to ensure that Canada is a leader in both the extraction of critical minerals as well as the processing, refining and manufacturing of high value-added products.

Critical Minerals on Import and Export Control List

Given the importance of critical minerals in the transition to a sustainable economy and the need to widen and deepen domestic supply chains, USW believes there are reasonable grounds to add the critical minerals identified by the Government of Canada to the Export and Import Control List.

The deepening of our domestic supply chains occurs in a context where China has already cornered and monopolized the processing of key critical minerals. China is the global lead producer of 29 commodities, including 22 metals.⁷ China also dominates global critical mineral supply chains, accounting for approximately 60% of world-wide production and 85% of processing capacity.⁸ This provides China with significant economic and political leverage and poses a significant risk to the economic security of Canada and our closest allies. Overreliance on China's critical mineral supply chains also undermines our ability to independently transition our economies toward cleaner and greener production methods and products at risk.

Given the infancy and underdevelopment of our own critical minerals supply chains, USW asserts that greater state monitoring and control of trade in critical minerals is in the public interest. The *laissez faire* approach to trade and industrial policy is quite simply unjustifiable

⁶ Mineral products are classified into four stages of processing: (1) primary products include metal scrap and products from the mining industry, such as ores and concentrates; (2) smelting and refining products include products from metallurgical processes, which are relatively pure minerals, metals and alloys; (3) semi-fabricated products include semi-fabricated products that are input in other industries, such as wire, sheets, strips, tubes and flat rolls; (4) fabricated products include further processed products and final goods, such as metal structures and framing, hardware items, tools, cutlery and pipefittings. See, Government of Canada (2023) Mineral Trade Information Bulletin, September 2023: <https://natural-resources.canada.ca/maps-tools-and-publications/publications/minerals-mining-publications/mineral-trade/19310#trade>. Accessed September 23, 2024.

⁷ Coyne, Bassi. "China's dominance over critical minerals poses an unacceptable risk." The Interpreter. March 20, 2024. <https://www.lowyinstitute.org/the-interpreter/china-s-dominance-over-critical-minerals-poses-unacceptable-risk>

⁸ Glaser, Wulf. "China's role in Critical Mineral Supply Chains." GMF. <https://www.gmfus.org/news/chinas-role-critical-mineral-supply-chains>

in the current global context. Trade in key critical minerals, particularly those that Canada has a competitive advantage in the mining and processing phases, such as in nickel, copper and potash should be closely monitored so as not to undermine our domestic industry. In the case of exports, the Government of Canada should take greater care to monitor and control the exports of our trade in critical minerals, which are finite, to ensure that exports of these resources do not undermine our economic security and further the ambitions of rival world powers.

Addressing the vulnerability in our nickel mining and supply chains

Canada has a comparative advantage in the production and processing of nickel, a vital critical mineral used in the EV supply chain. However, even in the nickel sector, Canada's advantage is under threat. In 2019, for instance, Glencore shuttered the Brunswick lead smelter in Belledune, New Brunswick. In 2018, Vale closed its nickel smelter and refinery in Thompson, Manitoba. USW is concerned that future capacity shutdowns in nickel and critical minerals are possible if action is not taken.

In nickel, China has invested heavily in Indonesia, building smelter and refinery capacity to produce battery-grade nickel cheaply for its EV supply chain. This has come at a devastating cost to the environment due to the utilisation of HPAL⁹ production processes to refine laterite deposits.¹⁰ Indonesia now produces 40% of the world's share of nickel.¹¹ This has led to excess supply in the global nickel market and has put downward pressure on nickel prices. As a result, nickel mines around the world have been closed or decommissioned.

The current and ongoing global excess supply of nickel threatens nickel mining and processing in Canada. Low or stagnant anticipated commodity prices distorts nickel mining investment towards nickel ore bodies that lack substantial or key by-products, such as copper or platinum group metals. Although Canada currently imports low levels of nickel and nickel products, the Government of Canada should consider an extension of Section 53 tariffs to nickel and nickel products originating from Indonesia and China. In addition, the Government of Canada should provide investment subsidies to assist domestic nickel producers in capacity and growth projects.

Making Use of Buffer Stocks to Ensure North American Supply and Attenuate Price Volatility

In commodity sectors that are either key to Canada's development of its critical minerals strategy and supply chains or particularly threatened by Chinese unfair competition, the

⁹ High Pressure Acid Leach (HPAL) is a process used to extract nickel and cobalt from laterite ore bodies.

¹⁰ Mills, Rick. Mining.Com Indonesia and China Killed the Nickel Market
<https://www.mining.com/web/indonesia-and-china-killed-the-nickel-market/>

¹¹ Silva, "Indonesian Nickel Production Dominates Commodity Market", S&P Global.
<https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/indonesian-nickel-production-dominates-commodity-market-80242322>

Government of Canada should consider the use of buffer stocks or strategic stockpiles as a tool in its economic security kit.¹²

Buffer stocks are often used by governments, usually as a price stabilization scheme in volatile markets. They are also used as a strategic tool to mitigate against supply shortages, such as the US Strategic Petroleum Reserve and the National Defense Stockpile. A Canadian Critical Minerals Buffer Stock would reduce domestic producers' dependence on China as an export market and ensure that supply is available to domestic and continental downstream consumers at fair prices. Such a program would reduce price volatility and ensure stability not only for primary producers but also manufacturers. It will also help to ensure that domestic resources go towards building domestic supply chains and resiliency instead of further entrenching the power of Canada's geo-political rivals.

Supporting melted and poured Canadian steel

Steel is a key strategic industry that is crucial to Canadian domestic economic security and sovereignty. The Canadian steel industry is indispensable to the economic and political security of Canada. The steel industry is also integral to the development of a modern and green economy.

Over the past 30 years, the Canadian steel industry has become export oriented largely because of the flooding of the domestic economy with cheap and dumped foreign steel. Canadian supply chains today are reliant on imported steel and over 60% of our steel is supplied by imports. This situation weakens our domestic economic security by reducing Canada's self-sufficiency in steel and increasing our reliance of foreign markets.

Import penetration is a major threat to the Canadian steel sector. From 1984 to 2023, steel imports' share of the Canadian market climbed from 15.5% to 62.5%. These trends are both caused and worsened by the effects of unfair trade, overcapacity in foreign markets and circumvention of global and domestic trade rules. Canadian steel producers often compete with non-market countries, such as China, which unfairly subsidize their domestic producers, which dump their products at fire sale prices in the lucrative Canadian market.

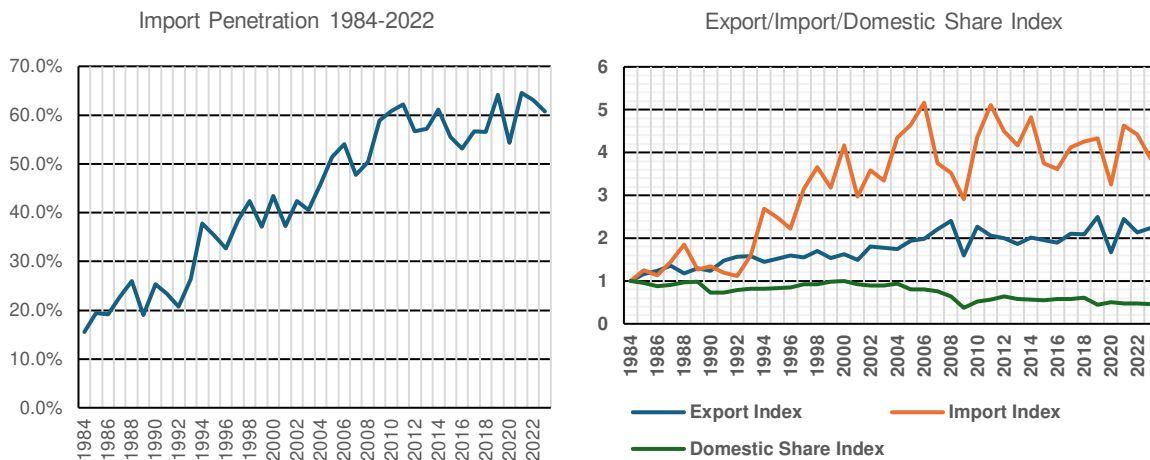
From USW's perspective, this level of import penetration is unsustainable and is undermining the Canadian steel industry and our economic security.

The unrelenting incursion of foreign steel into Canadian markets has compelled Canadian steel producers to look to export markets to sell their goods, with little success. Exports of Canadian made steel have doubled since 1984 and now account for over 50% of our domestic production. But this restructuring of Canadian steel production towards exports has come at a cost. During the same period the level of *imports have grown four-fold*¹³ and imports of steel products now

¹² Exner-Pirot, "Why Critical Minerals are key to Canada's Global Influence." MacDonald Laurier Institute. February 2024

¹³ Data from World Steel Statistical Yearbook 2023

make up over 60% of Canadian domestic steel consumption.¹⁴ The result is that Canadian consumption of Canadian-made steel products has declined by more than 50% since 1984.



The impact of these trade patterns has been disastrous for both the Canadian steel sector and Canadian workers. In terms of raw steel capacity, Canada has lost over 5 million metric tons (MMT) of raw steel capacity since 1980, with most of that occurring after 2009. Although steel demand has grown, our raw steel production levels, about 12 MMT per year on average, are their lowest since the early 1970s. Canada has also lost considerable capacity in the flat, structural steel and rail product segments. Today, Canada is arguably no longer self-sufficient in steel and is dependent on foreign steel to supply key segments of our domestic market such as construction.

The decline of the Canadian steel sector has caused considerable harm to Canadians and their communities. In terms of employment, since 2001 employment in the Canadian steel industry has declined by 43.6%. Likewise, capacity utilization rates - the percentage of a steel producers' potential output that is being realized - have been trending downwards consistently since 2008.

As discussed above, the development and implementation of “Buy clean” and “Buy Canadian” procurement policies will encourage investment and reorient steel production towards our domestic market. Below we identify several other trade policy areas where Canada can do more to protect and develop our vital steel industry and enhance Canada’s economic security.

Making the case for further Section 53 and 55 tariffs

Section 53 and 55 of the *Customs Tariff* provide the Government of Canada with vital tools to protect Canadian industries and workers from unfair trade, including tariffs and tariff rate quotas. These may be applied, for instance, when a surge of imports causes serious injury or threat of injury to a Canadian industry, or when the policies and practices of a foreign government adversely affect the Canadian economy. Section 53 also provides authority to the Government of Canada to apply measures to defend Canadian interests under an

¹⁴ Data from World Steel Statistical Yearbook 2023; Global Steel Monitor; authors calculations

existing trade agreement. Canada should strengthen its resolve to use Section 53 and 55 to protect the Canadian steel industry from the devastating impacts of import surges, unfair trade, illegal dumping and excess industrial capacity from China and other foreign markets.¹⁵

US imposed tariffs and non-tariff barriers in the domestic steel market since 2018 have put additional pressure on the Canadian steel industry by diverting imports into our markets.¹⁶ Since 2017, import penetration into the Canadian steel market has worsened from 56.7% to 62.5%, and, since 2019, the import share has remained over 60%.¹⁷ Over the same period, the share of the Canadian market represented by CUSMA partners fell from 32.1% to 26.8% and the share of the domestic market belonging to China, South Korea, Turkey, India and Brazil has increased from 12% to 17%.¹⁸

The continued divergence in trade protection between the Canadian and US steel market will continue to make the Canadian market, despite its modest size, an attractive one for imports and dumping.¹⁹ If not curbed, these trends will continue to strain and undermine Canadian domestic steel producers and workers.²⁰ Canada should therefore consider the further application of section 53 and 55, of both tariff and non-tariff protections, to strengthen our economic security in regard to steel, but also to aluminum, critical minerals and other strategic commodities and goods.

¹⁵ The proposed application of Section 53 to China is a step in the right direction to address the dangers posed by Chinese subsidization of its steel industry and its pervasive dumping of steel products. However, this measure only applies to direct trade with China and does not address the indirect and global effects that Chinese overcapacity and overproduction impose in global steel markets, such as the spill over effect caused by Chinese exports and the rise of Chinese exportation of excess capacity to regions outside mainland China. In addition, while China is at the center of the distortions in the global steel market, it is not the only country that is guilty of building excess capacity and looking to the export market as a dumping ground for their excess production.

¹⁶ These barriers include absolute quota agreements with Argentina, Brazil and South Korea, tariff rate quota agreements with the EU, UK and Japan, a 25% tariff on Chinese steel under US section 301, and a 25% tariff on all other countries except Canada, Mexico and Australia under US section 232, including of course, China. This is in addition to current AD/CVD duties; see also Crowell & Moring LLP. US Section 232-Not all Quotas Are Created Equal <https://www.lexology.com/library/detail.aspx?g=31b4878f-57bf-475f-8444-1c4af7622a0b>

¹⁷ Data from World Steel Statistical Yearbooks; authors calculations

¹⁸ Data from World Steel Statistical Yearbooks and Global Steel Trade Monitor; authors calculations;

¹⁹ In regard to direct trade with China, despite the proposed imposition of a 25% tariff under section 53, Canada will still fall short due to the stacking of additional section US 232 tariffs of 25% and existing AD/CVD orders. As such, the layers of protections in place in the United States make it better equipped to deal with both the direct and indirect effects of Chinese overcapacity and overproduction and facilitate the ongoing diversion of imports to Canada.

²⁰ In the case of countries that are subject to absolute quotas by the United States, such as Argentina, South Korea and Brazil, the evidence of diversion is clear. Imports for all three countries spiked in 2018 after the quota agreements were put in place and have remained at consistently higher levels compared to pre- 2018 levels. In 2017 for example, one year prior to the US signing of an absolute quota agreement with South Korea, South Korean imports into Canada were approximately 380 thousand metric tonnes; in 2018 they were 560 thousand metric tonnes and by 2023 they were over 900 thousand metric tonnes. Data from Global Steel Monitor.

Ensuring that imported steel prices reflect their carbon content

Canadian producers make greener and cleaner steel; this should be a competitive advantage for our steel industry. Yet, since Canada progressively puts a price on its carbon emissions, it is, in the absence of a level playing field and supporting industrial policies, a liability that penalizes domestic producers and Canadian workers. To address the threat of carbon leakage, Canada should tax imported steel so that prices of steel imports reflect the full cost of their carbon emissions.

A fair and equitable Border Carbon Adjustment (BCA) will level that playing field. Recently, the European Union implemented a BCA on steel and other imported goods to address the threat of carbon leakage. Canada would do well to learn from this. We must not let other countries' poor environmental standards give them a competitive advantage over Canadian producers. While the United States does not have a price on carbon, it is developing policies and international partnerships to leverage its comparatively low-carbon steel to bolster its domestic steel sector. Canada must continue to work closely with the United States to develop a border carbon mechanism that will strengthen, rather than harm, our close trading relationship.

Enhancing and reforming our trade remedy system

For the past decade, USW has advocated extensively about the need for trade remedy reform and close alignment of our trade remedy system with the United States. Certainly, Canada has made significant improvements to our trade remedy system in recent years.²¹ However, to secure and develop Canada's key manufacturing sectors, Canada must continue to strengthen it. We make several recommendations:

First, trade unions should be granted full standing at Canadian International Trade Tribunal (CITT) and should be recognized as part of industry for the purpose of determining whether there is sufficient support for a trade case.²² In the United States, by contrast, unions have full standing to participate and initiate trade cases.²³ Unlike

²¹ Since 2015, Canada has made significant progress on its trade remedy system, in large part due to the advocacy of trade unions demonstrating the impact of unfair trade on Canadian workers. In 2015, amendments to the SIMA granted trade unions the right to participate in trade cases. Our union continued to advocate for further reform, including the right for trade unions to file trade cases, to expand the definition of material injury to include impact on workers, as well as for trade unions to have standing. Beyond these measures, we have advocated, both on our own and in conjunction with industry, for alignment with the United States on improved anti-circumvention measures, enhanced import monitoring and enforcement.

USW applauds various improvements to its trade remedy system, including anti-circumvention measures that went into effect in 2022. Additionally, the current development of melt and pour standards, stemming from a commitment made under the CUSMA, will improve steel trade monitoring and facilitate alignment with the United States, allowing Canada to better identify country of origin and thus prevent transshipment and circumvention.

²² Currently, unions are still refused standing in trade remedy complaints. Despite the ability to file a trade case and to participate in them, unions remain heavily reliant on producers. Unions still cannot bring a complaint forward unless a majority of domestic producers ultimately support the case.

²³ Under US law, (Tariff Act 1930 ss.732(2)(B) & 771(9)(D)), unions are granted the same rights to initiate complaints as domestic producers. In its 2020 submission, Government of Canada Consultation on

Canada, the definition of “domestic industry” specifically includes workers in determining the composition of the industry for the purposes of standing.²⁴

Second, Canada must improve and strengthen the monitoring and enforcement of anti-dumping and anti circumvention measures at our borders.²⁵ To this end, Canada should align its anti-circumvention measures with those of the United States. USW also asserts that existing anti-circumvention rules should be amended to eliminate the requirement that complainants prove that injury has occurred a *second* time. If injury has already been established, there should not be a second requirement to demonstrate adverse effect. USW also supports the Canadian Steel Producers Association’s (CSPA) position on assembly or completion in a third country, including their recommendation to alter the definition of circumvention to match that of the United States. Likewise, USW submits that Canada should align our regulations concerning the determination of Particular Market Situation (PMS) in exporting countries with the US recently expanded PMS toolkit.²⁶

Lastly, USW asserts that the Canada Border Services Agency (CBSA) must be properly resourced to ensure that it can monitor and enforce anti-dumping and anti-circumvention measures at our borders. Greater resources and staffing will also be necessary to implement recently announced monitoring of country of melt and pour and country of smelt and cast for imports of steel and aluminum, respectively. USW supports the establishment of the Market Watch Unit at the CBSA, which will allow for systematic review of normal values. But these new measures will be moot if the agency tasked with monitoring and enforcement is unable to do so. Likewise, this applies more broadly to steel and aluminum trade, where we need to ensure that the CBSA can identify goods that currently have orders on them.

Measures to Strengthen Canada’s Trade Remedy System,] USW submitted extensive rationale for union standing, where we clarified the need to align with the United States and the ensure that unions, as they main voice of Canadian workers, should carry legal weight when determining support for a trade case.

²⁴ 19 U.S.C. § 1671a(c)(4); see also 19 U.S.C. § 1673a(c)(4).

²⁵ USW, in conjunction with industry, has argued for the need for improved anti-circumvention measures, including the ability to initiate anti-circumvention cases. While legislative changes were made in 2018, followed by regulatory amendments in 2022, these have proved to be onerous and unused. In fact, the steel industry has not filed even a single case under the new rules.

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²⁶ As we have stated in a joint letter to the all-party steel caucus in 2023 and again in 2024, USW supports the CSPA’s position on the need for regulatory amendments to determining the Particular Market Situation (PMS). We need to strengthen the tools used to identify situations of distortion that undermine our trade protections. In effect, we see countries that can distort market conditions to mask dumping. While the PMS tool was adopted in 2018, it is too narrow in scope, as exemplified by cases related to Turkish pipe, plate and corrosion-resistant steel. Ultimately, USW submits that we should align the scope of the Particular Market Situation with the United States’ recently expanded toolkit.

Conclusion

USW thanks Global Affairs Canada for the opportunity to comment on *potential new measures to advance and defend Canada's economic security interests*. USW believes that the most effective way to bring coherence to the themes raised in this consultation is to develop a comprehensive green industrial strategy as we have outlined above. We must ensure that our trade objectives align with goals to bolster domestic economic security based on good, community-sustaining jobs while tackling environmental and climate goals.

Trade policy should change according to circumstances. However, it should always be consistent with ensuring domestic economic security and sovereignty. For too long the uncritical acceptance of free trade has led to the weakening and undermining of the Canadian public interest and economic security. This has led to the undermining of key strategic and economic industries such as steel and manufacturing. As a result, Canada has become too dependent on imports to supply its critical domestic supply chains. Contemporary trade policy should therefore re-enforce a comprehensive industrial strategy which seeks to rebuild Canadian industry and bolster our economic security and sovereignty.

Respectfully submitted by:  Date: September 23, 2024
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