



FERTILIZER CANADA

FERTILISANTS CANADA

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Dear Premier,

I would like to first thank you for the continued efforts of your government to address the COVID-19 pandemic. We have been pleased to see that your government has worked alongside public health officials and industry to ensure that Canadians are protected. We greatly appreciate the recognition by your government of the fertilizer and mining sectors as essential parts of the economy that must continue to operate. However, we are asking for additional support in the transportation of our final products and the inputs to our manufacturing facilities.

As you continue your whole-of-government response to the pandemic, on behalf of the fertilizer industry, we are asking that you continue to provide the necessary flexibility to ensure the delivery of fertilizer, which is critical for a successful planting season, and key inputs to our manufacturing processes. Your government should consider new, more expansive regulatory relief mechanisms for companies that transport their goods. We ask that you:

1. Use the available mechanisms within your labour act to declare the COVID-19 response an emergency and allow employees and employers flexibility in scheduling provisions and hours of work.
 - a. This has already been done in Ontario by the Federal Government for federally regulated businesses under Section 177(1) of the Canada Labour Code.
2. Relax Hours of Service regulations, where safe and provided all safety conditions are met, so that truck drivers are able to more efficiently and effectively move their goods.
 - a. Fertilizer Canada has run a successful Hours of Service exemption program at the federal level for interprovincial trucking for almost a decade, allowing drivers to exceed their Hours of Service regulations if they have met numerous training and safety requirements and are transporting anhydrous ammonia; we believe a similar model is applicable at the provincial level with all fertilizer products.
3. Work to rapidly provide exemption permits for carriers that wish to use electronic shipping documents under the *Transportation of Dangerous Goods Regulations*. This would protect vulnerable essential services by minimizing the physical contact necessary between manufacturers, retail workers, rail workers, and truck drivers, as goods move throughout the supply chain.
 - a. This permit exemption system has already been implemented in Alberta as a response to COVID-19.
4. Work with municipalities and industry to increase the limits on weight of loads that vehicles can carry and expedite or waive the costs of overweight good permits. Through this partnership, we believe that any damage to roadways can be minimized



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and doing so would allow the fertilizer industry to keep our critical product flowing to farmer's fields even if the trucking community is impacted by COVID-19.

- a. Alberta, Saskatchewan, Ontario, Manitoba, and Quebec have already instituted a spring thaw road ban exemption for fertilizer products. We believe an overweight goods exemption for our products would make best use of the road ban exemptions. Our designation as an essential industry proves the importance of our goods to food security and the pandemic response, and therefore all movement of our goods should be included in these exemptions.

As Canada looks to re-open its economy in the coming months, agri-business will play a leading role. To do so we need the ability to get as much product to farmer's fields as quickly as possible, and a positive planting season has never been more critical.

Your government has stated, the response to the pandemic evolves rapidly and changes often. Therefore, we believe that these tools should be available to employers now, ensuring that there are no disruptions to the supply chain as we wait for a government's response. Over the last year the fertilizer industry, and our farmer customers, have been challenged; between labour stoppages, blockades, and now the pandemic, our supply chains have been put to the test. Canada's fertilizer industry is doing everything possible to ensure farmers receive essential fertilizer products in time for spring seeding in April and May, while protecting employees and the public from COVID-19.

Sincerely,

Garth Whyte
President & CEO
Fertilizer Canada