

October 1, 2025

SENT VIA EMAIL

The Honourable François-Philippe Champagne, P.C., M.P.  
Minister of Finance and National Revenue  
[minister-ministre@fin.gc.ca](mailto:minister-ministre@fin.gc.ca)

The Honourable Anita Anand, P.C., M.P.  
Minister of Foreign Affairs  
[Anita.anand@international.gc.ca](mailto:Anita.anand@international.gc.ca)

Dear Ministers,

**Re: Addressing China's non-market economy status  
within Canada's trade remedy system**

Unfair Chinese imports remain a persistent threat to Canadian industry, and Canadian jobs. China's export-led industrial model, structural overcapacity, and deplorable labour standards creates major competitive disparities and price distortions across a variety of goods – from primary metals to finished consumer goods. Unifor has carefully documented these concerns in its 2024 submission to Finance Canada's China EV Surtax consultation<sup>1</sup>. These concerns stretch beyond the automobile industry.

Our union regularly participates in anti-dumping investigations undertaken by the Canada Border Services Agency (CBSA) and the Canadian International Trade Tribunal (CITT), in defence of our domestic industries and workers negatively impacted by unfair trade.<sup>2</sup>

Currently, Unifor is participating in a matter regarding Chinese dumping of Thermal Paper (a product used in Canada for point-of-sale receipts, lottery tickets and other financial applications), which threatens the sustainability of this domestic industry along with good-paying, community-supporting jobs of Unifor members.

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<sup>1</sup> Unifor, Advocating for a Strong, Sustainable Canadian Auto Industry (August 1, 2024):  
<https://www.unifor.org/sites/default/files/documents/Unifor%20submission%20China%20EV%20trade%20practices-EN.pdf>

<sup>2</sup> For a complete list, see: <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/menu-eng.html>

China is a constant offender of international trade rules and labour standards. In fact, China is implicated in approximately 60% of goods currently subject to Canadian anti-dumping or other trade remedy measures under the *Special Import Measures Act* (“SIMA”).

While stop-gap measures, like the China EV Surtax Order, are necessary there remains significant, structural gaps in our trade remedy system that must be addressed. Our trade remedy rules and guidelines must allow for swift and meaningful interventions by the CBSA and CITT and must reflect the reality of China’s strategy of structural overcapacity and must ensure the protection of Canadian jobs.

I strongly urge the federal government to work with officials of the CBSA to deem China a non-market, or state-trading, economy for the purposes dumping investigations – no different than how China is currently treated in the matter of imported steel products. Such a change, applied to a wide range of durable and non-durable goods, will provide far-reaching tools to design appropriate remedies in the case of Thermal Paper, and others. This is no different than actions taken by the United States.

Further, there are **existing** means by which the President of the CBSA can exercise their authority through a broader application of **section 20 of the SIMA** and administrative revisions to the SIMA Handbook, as communicated by industry representatives to the CBSA directly, and I would strongly urge these be considered.

Ministers, our union is committed to defending good Canadian jobs in the face of an unprecedented U.S. trade war. But the ramifications of U.S. actions on global trade are far-reaching. As the Trump Administration applies additional tariffs on global imports, Canada becomes more vulnerable to increased import flows, transshipment and dumping, particularly from China.

I look forward to a positive response to this matter.

Sincerely,



**Lana Payne**  
**National President**

CC: The Honourable Minister Leblanc, The Honourable Minister Sidhu, The Honourable Minister Joly, Chris Forbes, Deputy Minister of Finance, David Morrison, Deputy Minister of Foreign Affairs.

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