

April 2, 2025

The Honourable François-Philippe Champagne, P.C. M.P
Minister of Finance
Department of Finance Canada
90 Elgin Street
Ottawa, Ontario K1A 0G5
Email: consultations@fin.gc.ca; remissions-remises@fin.gc.ca; francois-philippe.champagne@fin.gc.ca; minister-ministre@fin.gc.ca

RE: U.S. Tariff Consultations

Dear Minister Champagne,

Electro-Federation Canada (EFC), representing Canada's electrical and automation industry, strongly opposes the tariffs proposed by President Trump on Canadian imports. As you well know, these tariffs threaten to disrupt North American supply chains, increase costs for businesses and consumers, and put thousands of jobs at risk.

EFC's more than 230 member companies manufacture, distribute, market, sell, and maintain a wide range of electrical and automation products.¹ These products represent the supply chain of critical parts, components, and equipment used to power industries across North America, from energy and manufacturing to transportation and construction. EFC members contribute over \$15.1 billion to the Canadian economy annually and support over 109,000 jobs across the country.

Free Trade to support Energy and Economic Security

EFC urgently requests Canada fight for free trade for the electrical and automation industry by seeking an exemption for electrical products under the U.S. Administration's proposed 25 percent tariff on Canadian imports. As Canada continues to negotiate with the Americans, it will be important to emphasize that seeking an exemption for electrical products is paramount to both countries' energy and economic interests.

The integrated Canadian and U.S. electrical and automation industries support the goals of collective energy independence, secure energy supply chains, and a resilient electrical grid. U.S. tariffs on Canadian electrical products would stall energy developments, delay essential infrastructure projects, and hinder the ability of both countries to meet the demands of their growing populations. It would also diminish the U.S. and Canada's capacity to respond to global energy challenges, leaving us more vulnerable to supply chain disruptions and geopolitical implications thereby compromising our energy security.

¹ Products examples include distribution equipment, transformers, switchgears, electric vehicle chargers, lighting, motors & generators, cables & wires, wiring supplies, industrial controls, enclosures, and automation/optimization software.

From an economic perspective, the United States is the Canadian electrical and automation industry's largest customer. Due to incompatible voltage and electrical systems, diversifying to other markets is not a viable alternative for our industry. Maintaining barrier free trade is an utmost priority to support Canadian exports and maintain Canadian Jobs. As of today, Canada exports approximately \$17.88 billion of electrical and automation products to the U.S., representing approximately 84 percent of all exported electrical products. In turn, Canada imports \$16.23 billion of electrical and automation products from the U.S., representing approximately 40 percent of imported electrical products.

Fair Trade to protect Canadian Businesses

However, if Canada is unable to secure an exemption for electrical products, EFC strongly believes Canada should take a fair-trade approach to protect Canadian businesses and jobs by applying retaliatory tariffs to all U.S. electrical products unless no alternate supplies are available in Canada. Matching tariffs product by product will level the playing field for companies manufacturing and operating in Canada.

Upon review of [Canada's Notice of Intent to Impose Countermeasures in Response to United States Tariffs on Canadian Goods](#), EFC has included a list of HS codes to be added to the list of goods in Table 1 as there is available supply of these products in Canada and tariffs will help protect Canadian businesses and jobs. This list is available in Appendix 1.

Exemptions required due to supply chain constraints

EFC has also included a list of HS codes that should be exempted from Canada's suite of retaliatory tariffs. These items are essential components within the electrical and automation supply chain, and there are currently no viable alternative supplies of these products within Canada or through other trading partners that can meet the necessary specifications, quality standards, and volume requirements. Without access to these critical products, Canadian electrical and automation manufacturers will face significant production delays, increased costs, and potential shutdowns, severely undermining their ability to remain competitive in North American and global markets. Imposing 25 percent tariffs on these essential items will disrupt operations across multiple industries, resulting in economic harm that extends beyond the electrical and automation sector. This list is available in Appendix 2.

Working Together

As negotiations between Canada and America continue, our organization calls on both governments to uphold the free-trade policies agreed to as part of the CUSMA and to find a resolution that supports continued economic growth and cooperation. We are working closely with our partner organizations in the U.S. and Mexico to communicate the same message of cooperation and free trade to their respective governments.

EFC is grateful for the opportunity to provide input to the government on the proposed list of tariffed imported goods. We appreciate the tremendous effort the Canadian government has taken and continues to take to protect the interests of our nation. EFC is a supportive partner and will stand by the government in the face of unjust threats to our security and economic prosperity.

Most Sincerely,



Carol McGlogan
President & CEO, Electro-Federation Canada

Copy to:

Right Hon. Mark Carney, P.C., M.P. - Prime Minister of Canada
Hon. Jonathan Wilkinson, P.C. M.P. - Minister of Natural Resources
Hon. Dominic LeBlanc, P.C. M.P. – Minister of International Trade and Intergovernmental Affairs
MP Taleeb Noormohamed, Parliamentary Secretary to the Minister of Finance and Intergovernmental Affairs (Canada-U.S.)
MP Francesco Sorbara, Parliamentary Secretary to the Minister of Finance and Intergovernmental Affairs
MP Ryan Turnbull, Parliamentary Secretary to the Minister of Finance and Intergovernmental Affairs and Parliamentary Secretary to the Minister of Innovation, Science, and Industry
Marco Mendocino, Chief of Staff to the Prime Minister of Canada

APPENDIX

List of Electrical Products to Include in Retaliatory Tariffs

HS6	HS Description
391721	Tubes, pipes and hoses, rigid, of polyethylene
391722	Tubes, pipes and hoses, rigid, of polypropylene
391723	Tubes, pipes and hoses, rigid, of polyvinyl chloride
391729	Tubes, pipes and hoses, rigid, of plastics, nes
391731	Tubes, pipes & hoses, flexible, plastic, minimum burst pressure of 27.6 MPa
391732	Tubes, pipes and hoses, nes, plastic, not reinforced, etc, without fittings
391733	Tubes, pipes & hoses, of plastic, not reinforced/combi w o materials, w fittings, nes
391739	Tubes, pipes and hoses, nes, plastic
391740	Fittings, of plastic, for tubes, pipes and hoses
731010	Tanks, casks, drums, cans, boxes & sim contr, i or s, capacity >=50l but <300l
732211	Radiators and parts thereof, cast iron
732219	Radiators and parts thereof, iron or steel, other than cast iron
732611	Grinding balls & sim articles for mills, of iron/steel, forged or stamped, nfw
732619	Articles of iron or steel, forged or stamped, but not further worked
732620	Articles of iron or steel wire, nes
732690	Articles, iron or steel, nes
740811	Wire of refined copper of which the max cross sectional dimension exceeds 6mm
740819	Wire, of refined copper of which max cross-sectional dimension is 6mm or less
741300	Stranded wire, cable, plaited bands and the like, of copper not elec insulated
760110	Aluminium unwrought, not alloyed
760120	Aluminium unwrought, alloyed
760511	Wire, aluminum, not alloyed, with a maximum cross-sectional dimension > 7mm
760519	Wire, aluminum, not alloyed, with maximum cross-sectional dimension of 7mm or less
760521	Wire, of aluminum alloys, of which the maxium cross-sectional dimension > 7 mm
760529	Wire, aluminium alloy, with a maximum cross sectional dimension of 7mm or less
761410	Stranded wire, cables, plaited bands, etc, alum, steel core, not elect insul
761490	Stranded wire, cables, plaited bands & the like or alum, not elect insul, nes
761610	Nails, tacks, staples, bolts, nuts & sim art, aluminium, o/t staples of No 83.05
761691	Cloth, grill, netting and fencing, of aluminum wire
761699	Articles of aluminium, nes, for example castings, forgings, etc
847990	Parts, of machines & mechanical appliances, nes, having individual functions
850410	Ballasts for discharge lamps or tubes
850421	Liquid dielectric transformers, having a power handling capacity <=650 kVA

- 850422 Liq dielectric transf, having a power handling cap >650 kVA but <= 10,000 kVA
- 850423 Liq dielectric transf, having a power handling capacity exceeding 10,000 kVA
- 850434 Transformers electric, having a power handling capacity exceeding 500 kVA, nes
- 850450 Inductors, electric
- 850490 Parts of electrical transformers, static converters and inductors
- 850520 Electro-magnetic couplings, clutches and brakes
- 850590 Electro-magnets, nes, and parts of No 85.05
- 850720 Lead-acid electric accumulators, nes
- 851310 Portable electric lamps, designed to function by their own source of energy
- 851390 Parts of portable elect lamps, designed to function by own source of energy
- 851621 Electric space heating apparatus, having storage heating radiators
- 851629 Electric space heating apparatus and electric soil heating apparatus, nes
- 851680 Electric heating resistors
- 853222 Electrical capacitors, fixed, aluminium electrolytic
- 853225 Electrical capacitors, fixed, dielectric of paper or plastics
- 853310 Electrical resistors, fixed carbon, composition or film type
- 853339 Wirewound variable resistors, including rheostat and potentiometers, nes
- 853340 Variable resistors, including rheostats and potentiometers, nes
- 853510 Electrical fuses, for a voltage exceeding 1,000 volts
- 853521 Automatic circuit breakers, for a voltage exceeding 1,000 volts but < 72.5 kV
- 853529 Automatic circuit breakers, for a voltage exceeding 1,000 volts, nes
- 853530 Isolating switches and make-and-break switches, voltage > 1,000 volts
- 853540 Lightning arresters, voltage limiters and surge suppressors, > 1,000 V
- 853590 Electrical apparatus for switching or protec elec circuits, > 1,000 volts, nes
- 853610 Electrical fuses, for a voltage not exceeding 1,000 volts
- 853630 Electrical app for protecting electric circuits, for a voltage <=1,000 V, nes
- 853641 Electrical relays for a voltage not exceeding 60 volts
- 853649 Electrical relays for a voltage > 60 V but not exceeding 1,000 volts
- 853650 Electrical switches for a voltage not exceeding 1,000 volts, nes
- 853661 Electrical lamp-holders, for a voltage not exceeding 1,000 volts
- 853690 Electrical app for switching or protec elec circuits, not exceed 1,000 V, nes
- 853720 Boards, panels, including numerical control panels, for a voltage > 1,000 V
- 853810 Boards, panels, etc, for goods of No 85.37, not equipped with their app
- 853890 Parts for use with the apparatus of Nos 85.35, 85.36 or 85.37, nes
- 853921 Filament lamps, electrical, tungsten halogen, o/t ultra-violet/infra-red lamps
- 853922 Filament lamps,elec,power <= 200W,vltge > 100V,o/t ultra-violet/infra-red lamps

- 853929 Filament lamps, electrical, o/t ultraviolet or infra-red lamps, nes
- 853931 Fluorescent lamps, electrical, hot cathode, o/t ultra-violet lamps
- 853932 Mercury/sodium vapour lamps & metal halide lamps, elec, o/t ultra-violet lamps
- 853939 Discharge lamps, other than ultra-violet lamps, nes
- 853941 Arc-lamps
- 853949 Ultra-violet or infra-red lamps
- 854370 Electrical machines and apparatus, having individual functions, nes
- 854390 Parts of electrical machines & apparatus having individual functions, nes
- 854420 Co-axial cable and other co-axial electric conductors
- 854449 Electric conductors, for a voltage not exceeding 80 V, nes
- 854460 Electric conductors, insulated, for a voltage exceeding 1,000 V, nes
- 854470 Optical fibre cables, made up of individually sheathed fibres
- 854520 Brushes, of carbon or graphite, of a kind used for electrical purposes
- 903210 Thermostats
- 940511 Lum & ltng fttgs, chandeliers, o elec ceiling/wall, dsnd f use solely w LED lt src
- 940519 Luminaires & ltng fttgs, chandeliers & o elec ceiling/wall, o/t LED light source
- 940521 Lum, of elec table, desk, bedside/floor-standing, dsnd f use solely w LED lt sources
- 940529 Luminaires, of electric table, desk, bedside or floor-standing, o/t LED lt sources
- 940541 Luminaires & ltng fittings, elec, photovoltaic, dsnd f use solely w LED lt sources
- 940542 Luminaires & ltng fittings, elec, o/t photovoltaic, dsnd f use solely w LED lt src
- 940549 Luminaires and lighting fittings, of electric, nes
- 940550 Non-electrical luminaires and lighting fittings
- 940561 Illuminated signs, name-plates, permt fixed lt src, dsnd f use solely w LED lt src
- 940569 Illuminated signs, name-plates, permt fixed lt src, o/t dsnd f u sole w LED lt src
- 940591 Parts, of glass, of lamps, lighting fittings, illuminated signs/name-plates, like, nes
- 940592 Parts, of plastics, of lamps, lighting fit, illuminated signs/name-plates, like, nes
- 940599 Parts, of lamps & lighting fittings, illuminated signs/name-plates, the like, nes

Exemptions required due to supply chain constraints

HS6	HS Description
390330	Acrylonitrile-butadiene-styrene (ABS) copolymers
390410	Poly(vinyl chloride), not mixed with any other substances
390421	Poly(vinyl chloride), not plasticised, nes
390422	Poly(vinyl chloride), plasticised, nes
390430	Vinyl chloride-vinyl acetate copolymers

390440 Vinyl chloride copolymers, nes
 391510 Polyethylene waste and scrap
 391520 Polystyrene waste and scrap
 391530 Polyvinyl chloride waste and scrap
 391590 Plastics waste and scrap, nes
 391990 Self-adhesive plates, sheets, film, etc, of plastic, nes
 392590 Builders' ware, nes, of plastics
 392690 Articles of plastics or of other materials of Nos 39.01 to 39.14, nes
 400599 Compounded rubber, unvulcanized, in primary forms, nes
 482190 Paper labels of all kinds, not printed
 490199 Books, brochures, leaflets and similar printed matter, nes
 680610 Slag wool, rock wool and similar mineral wools, in bulk, sheets or rolls
 681099 Articles of cement, of concrete or of artificial stone, nes
 681519 Articles of graphite or other carbon, for non-electrical uses
 681599 Articles of stone or of other mineral substances, nes
 690919 Ceramic wares laboratory, chemical/other technical uses, nes
 691490 Articles of ceramic, nes
 721691 Angles, shapes and sections, i/nas, cf or cold finished from flat rolled prod
 721699 Angles, shapes and sections, i/nas, cold formed or cold finished, nes
 722511 Flat rolled products, of silicon-electrical steel, >= 600 mm wide, grain oriented
 722519 Flat rolled products, of silicon-electrical steel, >= 600 mm wide, nes
 722611 Flat rolled prod, al, o/t stainless, of sil elect steel, grain oriented, <600mm wide
 722619 Flat rolled products, alloy, o/t stain, of silicon elec steel, <600 mm wide, nes
 730711 Tubes or pipe fittings, cast, of non-malleable cast iron
 730719 Fittings, pipe or tube, cast, of iron or steel, nes
 730729 Fittings pipe or tube of stainless steel, nes
 730792 Threaded elbows, bend and sleeves, iron or steel, nes
 730799 Fittings, pipe or tube, iron or steel, nes
 731210 Stranded wire, ropes and cables of iron or steel, not electrically insulated
 740311 Copper cathodes and sections of cathodes unwrought
 741533 Screws, bolts and nuts, of copper
 750522 Wire, of nickel alloys
 820330 Metal cutting shears and similar tools, of base metal
 820340 Pipe-cutters, bolt croppers, perforating punches & similar tools, of base metal
 820559 Hand tools for masons, watchmakers, miners, nes, of base metal
 820570 Vices, clamps and the like, of base metal

- 820730 Tools,for pressing/stamping/punching,interchan,for hand/mach-tls,of base metal
- 820790 Screwdriver bits,lapping tools & o interchan tools,for hand/mach-tls,of base met
- 830210 Hinges of base metal
- 830249 Mountings, fittings and similar articles of base metal, nes
- 830790 Tubing, flexible, with or without fittings, of base metal, nes
- 831000 Letters, numbers, sign-plates & sim art of base metal, o/t those of No 94.05
- 841280 Engines and motors, nes
- 842612 Mobile lifting frames on tires and straddle carriers
- 842890 Lifting, handling, loading or unloading machinery, nes
- 843139 Parts of lifting, handling, loading or unloading machinery, nes
- 846729 Tools, nes, hand-held, with self-contained electric motor
- 846789 Tools for working in the hand with self-contained non electric motor, nes
- 846799 Parts, of hand tools, nes
- 847141 Digital auto data process machines, o/t portable of No 8471.30
- 848790 Machinery parts,w/o elec conn,insulators,coils,cntc,etc,nes in Chapter
- 850110 Electric motors, of an output not exceeding 37.5 W
- 850120 Universal AC/DC motors, of an output exceeding 37.5 W
- 850131 DC motors, DC generators, electric, of an output not exceeding 750 W
- 850132 DC motors, DC generators, electric, of an output > 750 W but not <= 75 kW
- 850133 DC motors, DC generators, electric, of an output > 75 kW but <= 375 kW
- 850134 DC motors, DC generators, electric, of an output exceeding 375 kW
- 850140 AC motors, electric, single-phase, nes
- 850151 AC motors, electric, multi-phase, of an output not exceeding 750 W
- 850152 AC motors, electric, multi-phase, of an output > 750 W but <= 75 kW
- 850153 AC motors, electric, multi-phase, of an output exceeding 75 kW
- 850161 AC generators, alternators, electric, of an output not exceeding 75 kVA
- 850162 AC generators, alternators, electric, of an output > 75 kVA <= 375 kVA
- 850163 AC generators, alternators, electric, of output > 375 kVA <= 750 kVA
- 850164 AC generators, electric, of an output exceeding 750 kVA
- 850171 DC generators, photovoltaic, of an output not exceeding 50 W
- 850172 DC generators, photovoltaic, of an output exceeding 50 W
- 850180 AC generators (alternators), photovoltaic
- 850211 Generating sets, diesel or semi-diesel engines, of an output <= 75 kVA
- 850300 Parts of electric motors, generators, generating sets and rotary converters
- 850431 Transformers electric, power handling capacity not exceeding 1 kVA, nes
- 850432 Transformers electric, power handling capacity > 1 kVA but <= 16 kVA, nes

- 850433 Transformers electric, power handling capacity > 16 kVA but <= 500 kVA, nes
- 850440 Static converters, nes
- 851762 Machines, f reception/conversion/transmission/regeneration of voice/images/o data
- 851769 App, f transm/reception of voice/img/o data, incl f comm in wired/wrl network, nes
- 853110 Burglar or fire alarms and similar apparatus
- 853180 Electric sound or visual signalling apparatus, nes
- 853321 Electrical resistors fixed for a power handling capacity not exceeding 20 W
- 853620 Automatic circuit breakers for a voltage not exceeding 1,000 volts
- 853669 Electrical plugs and sockets, for a voltage not exceeding 1,000 volts
- 853710 Boards, panels, including numerical control panels, for a voltage <=1,000 V
- 853910 Sealed beam lamp units, electrical
- 854141 Photosensitive semiconductor devices, of LED, w/n assembled in modules/into panels
- 854149 Phtosens semicon dev, incl photovoltaic cells, LED, w/n assem in modules/panels, nes
- 854190 Parts of mounted piezo-electric crystals and semiconductor devices
- 854411 Winding wire, insulated, of copper, electric, including enamelled or anodized
- 854419 Winding wire, insulated, o/t of copper, electric, including enamelled/anodized
- 854442 Electric conductors, insulated, for a voltage <= 1,000 V, fitted with connectors
- 854690 Electrical insulators, nes
- 854720 Insulating fittings of plastics for elec machines, appliances or equipment
- 854790 Insulating fittings for electrical mach appliances or equipment, nes
- 902620 Instruments and apparatus for measuring or checking pressure
- 902690 Parts of inst and app for measuring or checking variables of liq or gases, nes
- 902750 Instruments and apparatus using optical radiations (UV, visible, IR), nes
- 903040 Instruments and apparatus, specially designed for telecommunications
- 903082 Instruments and app, for meas/chk semicon wafers/devices, incl integrated circuits
- 930630 Cartridges, nes, and parts thereof