

February 7, 2012

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Cass R. Sunstein
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The Office of Management and Budget
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Gentlemen:

We, the undersigned companies and business associations, applaud the important work you and your staff have achieved in implementing the Regulatory Cooperation Council (RCC) launched by Prime Minister Harper and President Obama last year and the Action Plan announced on December 7, 2011. We represent thousands of companies in both Canada and the United States, indeed, many of which have significant cross-border supply chains and business interests.

The first round of stakeholder meetings in Washington DC on January 30 and 31st demonstrated your strong commitment in advancing an important next step in regulatory cooperation, in particular finding a way to ensure a lasting, forward-thinking, bilateral mechanism. We would like to take this early opportunity to assure you that we and our member companies and partners will be full partners in this endeavor as you implement the twenty-nine initiatives under the Action Plan.

You have asked for stakeholder comments and suggestions by February 7, 2012, a few short days following the Washington meetings. As you will understand, this very short time frame is unlikely to provide you with the substantive comments you are seeking and we urge you to postpone this deadline for another month, e.g. March 9, 2012. In addition and, again, to provide you with our most informed contribution, we urge you to consider further stakeholder meetings every three months.

Those of us who participated in the Washington meetings appreciated the “shared view” approach you have adopted, such as the “conquerability” agreements in the food safety sector and common recognition of permitting and nomenclature in other sectors. In the long run, these will be important contributions to resolving systemic and unnecessary irritants for our businesses.

A number of our members, however, have expressed some concern that many of the initiatives do not seem to have a readily apparent “deliverable” that will facilitate and reduce costs for cross-border trade. We ask that future stakeholder engagements provide a more transparent “road map” on this point and describe how the RCC action plan will contribute to or compliment the important effort under the Beyond the Border Action Plan. Reducing or eliminating regulatory differences, in our view, should translate into a reduced need for double inspections and reduction in paperwork.

In closing, we would paraphrase the observation made in Washington earlier this week – we drink each other’s water, eat each other’s food and drive each other’s automobiles. It is time our regulations reflect that high level of trust. Your leadership on the RCC will bring us closer to that objective.

Sincerely,



Jayson Myers
President & CEO
Canadian Manufacturers & Exporters

American Association of Exporters & Importers
Aerospace Industries Association of Canada
AMC - Agricultural Manufacturers of Canada
Association of Canadian Distillers
BIOTECanada
Campbell Soup Company
Canadian Consumer Specialty Products Association
Canadian Fertilizer Institute
Canadian Fluid Power Association
Canadian Foundry Association
Canadian Plastics Industry Association
Canadian Steel Producers’ Association
Canadian Tooling & Machining Association
Canadian Transportation Equipment Association
Canadian Vehicle Manufacturers Association (CVMA)
Cement Association of Canada
Chemistry Industry Association of Canada
FEDEX
Food & Consumer Products of Canada

GE Canada
Grocery Manufacturers Association
Maple Leaf Foods
Metals Service Center Institute
Railway Association of Canada
Rx&D
The Rubber Association of Canada

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