

Comments regarding the Proposed Modifications to the Canadian Transportation Agency
Guidelines respecting Coasting Trade License Applications

ILWU Local 400 Marine Section represents the majority of unlicensed seafarers on the West Coast and while the majority of Coasting Trade license applications occur on the East Coast and the Great Lakes the issue is very important to our organization.

ILWU Local 400 hereby goes on record as supporting the very thoughtful and thorough comments of Michel Desjardins President of the SIU dated December 17, 2009 and January , 2010. We support the SIU's comments in their entirety but would like to focus on the advance notice requirements, economic arguments and E-mail and Internet access.

1. Advance notice requirements; we agree with the SIU that the advance notice of thirty (30) days is sufficient and there is no need to lower the requirement because the fast track and urgent process is available.
2. We agree with the SIU's and the Council of Marine Carriers comments that; *"Economics should not be a valid argument respecting the temporary importation of vessels"*
3. We agree with the comments of the Council of Marine Carriers that website notification must be accompanied by email or fax notification.

ILWU Local 400 was not on the appropriate circulation list and that is why our submission was not sent in earlier.

Thank you for the opportunity to provide comments regarding this important issue.

Terry Engler President ILWU Local 400