

International Trade Policy Division (U.S. Tariff Consultations)  
Department of Finance  
90 Elgin St., 14<sup>th</sup> Floor  
Ottawa, Ontario K1A 0G5

**RE: Motor Coach Industry Input on Proposed Tariff Measures**

Dear Representative,

I am writing in response to the Government of Canada's call for input on the potential second round of retaliatory tariff measures that will be applied to all U.S. imports in the event that President Trump does not lift the 25% tariffs that were applied to all items flowing from Canada into the U.S.

Canada's motor coach and group travel industry consists largely of small and medium-sized businesses who play a major role in the country's multimodal passenger transportation network and contribute significantly to Canada's tourism economy. In fact, motor coach is the largest economic contributor in Canada's tourism industry by mode of transport, second only to airfare.

Additionally, Canada's motor coach manufacturing supply chain is global in nature, with major components, parts, and finished goods made both in the U.S and Canada. **Prevost and Motor Coach Industries (MCI) are the only two Canadian Motor Coach manufacturers in North America, based in Quebec and Manitoba.** However, many critical parts manufacturers who produce engines, transmissions, and electrical system are based in the U.S.

Approximately 80% of the buses manufactured in Canada, using some American-made parts, are exported back to the United States. Canadian tariffs on these critical components would mean that buses manufactured in Canada would be subject to Canadian tariffs on the critical components that are imported, as well as the U.S. tariffs on the completed motor coach export.

Any planned tariffs from Canada on buses or bus parts and components would have major negative impacts on Canada's motor coach and group travel industries, the Canadian jobs they support, and the Canadians who rely on scheduled affordable bus transportation each day.

Buses are a critical part of Canada's transportation ecosystem, serving a diverse range of sectors. The Government has made significant investments in busing infrastructure to support the development of new and existing communities, underscoring how critical they are to our national transportation and tourism ecosystem. Placing tariffs on these vehicles or their components would deeply impact Canadians and immediately increase the costs to residents, provinces, municipalities, and the businesses that use buses for transportation and tourism purposes.

**On behalf of our company, our employees and the communities we serve, I am writing to strongly support Motor Coach Canada's and the Ontario Motor Coach Association's calls for the Government of Canada to exclude buses, parts, supplies and materials used to produce motor coach buses from the second phase of retaliatory tariffs. (See below for the specific list Harmonized System codes)**

For any questions or requests for further information, please contact Motor Coach Canada President Vince Accardi at [vince@motorcoachcanada.com](mailto:vince@motorcoachcanada.com).

Sincerely,

**OMCA/ MCC are calling for relief from tariffs on the following eight-digit codes tariff codes:**

- 8702.20.10 Motor vehicles for the transport of 16 or more persons
- 8702.10.10 Motor vehicles for the transport of ten or more persons
- 8702.10.20 Motor vehicles for the transport of ten to 15 persons
- 8702.90.10: Motor vehicles for the transport of 16 or more persons, including the driver
- 8702.90.20: Motor vehicles for the transport of ten to 15 persons, including the driver
- 8408.20.00: Engines of a kind used for the propulsion of vehicles.
- 8708.22.00: Parts and accessories of the motor vehicles of headings 87.01 to 87.05.
- 8708.29.20: Door assemblies
- 8708.22.00: Front windcreens (windshields), rear windows and other windows
- 8708.50.39: Drive-axles with differential, whether or not provided with other transmission components:  
Other
- 8708.40.29: Gear boxes: Other
- 8708.94.99: Other: Other
- 8708.70.19: Road wheels: Other
- 8708.10.10: Bumpers and parts thereof
- 8708.10.29: Bumpers and parts thereof
- 8708.92.29: Silencers (mufflers) and exhaust pipes: Other
- 8708.21.00: Safety seat belts

**For a full list of tariff codes, please contact [vince@motorcoachcanada.com](mailto:vince@motorcoachcanada.com)**