

Response to US Tariffs – Table Summary

Place	Measure	Overview	Relevant Definitions	Application
Provincial Governments				
British Columbia				
British Columbia	Press Release (April 10, 2025)	The Province has directed ministries, health authorities and core Crown corporations to critically review all contracts with U.S. companies.	N/A.	N/A.
British Columbia	Press Release (March 13, 2025)	The Province has introduced Bill 7 . While no directives have yet been published, the Province has indicated that, if passed, the Act would permit cabinet to “direct public-sector bodies to exclude U.S. suppliers when procuring goods and services.” As of April 3, the Bill has undergone its second reading.	N/A.	N/A.
Alberta				
Alberta	News article March 14, 2025	Premier Danielle Smith outlines plans for a public campaign encouraging Albertans to support local products.	N/A.	N/A.
Saskatchewan				
Currently no identifiable provincial responses to U.S. tariffs re procurement.				
Manitoba				
Currently no identifiable provincial responses to U.S. tariffs re procurement.				

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Ontario				
Ontario	Regulation (April 2, 2018)	The Regulation designates New York as an “offending American jurisdiction” and it mandates that any structural iron used in procurement projects must be made outside of New York. Section 4 sets out which suppliers are considered to be “from New York”.	<p>Whether supplier is from New York</p> <p>4. (1) A supplier who is an individual is considered to be from New York if he or she is ordinarily resident in New York.</p> <p>(2) A supplier that is a partnership is considered to be from New York if at least 50 per cent of the partners are either,</p> <ul style="list-style-type: none"> (a) individuals who are ordinarily resident in New York; or (b) corporations whose head office or registered head office is in New York. <p>(3) A supplier that is a corporation is considered to be from New York if,</p> <ul style="list-style-type: none"> (a) the head office or registered head office of the corporation is in New York; or (b) the corporation is controlled directly or indirectly by, <ul style="list-style-type: none"> (i) individuals who are ordinarily resident in New York, (ii) a corporation whose head office or registered head office is in New York, or (iii) a partnership where 50 per cent of the partners are either, <ul style="list-style-type: none"> (A) individuals who are ordinarily resident in New York, or (B) corporations whose head office or registered head office is in New York. <p>(4) A Government entity may rely on a representation made by a supplier in a procurement process or in a procurement</p>	<p>When the restrictions apply:</p> <p>(1) This section applies to any procurement process initiated by a Government entity for the construction, reconstruction, alteration, repair, maintenance or improvement of a surface road or bridge where the value of the procurement contract at the time that the procurement contract is entered into is expected to be greater than \$1,000,000 U.S. dollars, and to any procurement contract that results from such a procurement process.</p> <p>When the restrictions do not apply:</p> <p>This Regulation does not apply to any procurement processes initiated by a broader public sector entity or any procurement contracts entered into by a broader public sector entity.</p> <p>Section 5 does not apply to a procurement contract that,</p> <ul style="list-style-type: none"> (a) was awarded before April 1, 2018, even if it was entered into on or after that date; (b) will be awarded on or after April 1, 2018, if the contract will be awarded under a procurement process for which a request for bids, a request for proposals or other procurement document, including a request for qualifications, was issued before April 1, 2018; or (c) is entered into for a purpose that is consistent with the objectives of an order issued under the Emergency Management and Civil Protection Act. <p>Section 5 only applies to the Ontario Infrastructure and Land Corporation if it is initiating a procurement process</p>

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			contract as to whether or not the supplier is from New York and is not required to verify the accuracy of the representation.	or entering into a procurement contract on behalf of a Government entity, or for a project for a Government entity.
Ontario	Regulation (March 31, 2024)	Note: Not tariff related but the regulation provides a valuable definition of “Ontario Business”	Ontario business 2. (1) A business that meets the following requirements is considered to be an Ontario business for the purposes of the Act: 1. The business is a supplier, manufacturer or distributor of any business structure that conducts its activities on a permanent basis in Ontario. 2. The business either, i. has its headquarters or main office in Ontario, or ii. has at least 250 full-time employees in Ontario at the time of the applicable procurement process. (2) In determining whether a business is considered to be an Ontario business for the purposes of the Act, a public sector entity may rely on a representation by the business that it meets the requirements of subsection (1).	N/A.
Ontario	Procurement Restriction Policy (March 4, 2025) See also: <ul style="list-style-type: none">GuidanceFAQs	The Policy is designed to restrict United States businesses from accessing public sector procurements in Ontario.	A US business means a supplier, manufacturer or distributor of any business structure (includes a sole proprietorship, partnership, corporation or other business structure) that: 1. Has its headquarters or main office located in the US, and 2. Has fewer than 250 full-time employees in Canada at the time of the applicable procurement process. If a bidder or vendor is a subsidiary of another corporation, part 1 of the definition above is met if that bidder or vendor is	Applies to all public sector entities, which means government entities and all designated Broader Public Sector organizations. It applies: <ul style="list-style-type: none">To all new procurement of goods and services (consulting and non-consulting) at any valueRegardless of the method of procurement – invitational, open competitive or non-competitive. It does <u>not</u> apply to:

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			<p>controlled by a corporation that has its headquarters or main office located in the US.</p> <p>A public sector entity can rely on a business' representation that it does not meet the definition of a US business.</p>	<ul style="list-style-type: none">• Municipalities.• Any procurement already in progress at the time that the Policy is effective (i.e. a procurement document has already been issued)• When public sector entities use existing Vendor of Record arrangements or other arrangements available to public entities.• Contract extensions included in the original procurement• Unforeseen situations of urgency <p>Exceptions: Procuring from a US business is allowed when both of the following conditions are met:</p> <ul style="list-style-type: none">• If the US business is the only viable source for the good/service; and• The procurement cannot be delayed (e.g. risks to public health and safety, etc.) <p>The Policy Guide provides additional guidance for how to determine if a procurement qualifies for an exception.</p>
Quebec				
Quebec	Regulation (March 6, 2025)	<p>The Province imposes penalties of up to 25% for entities having an “establishment” in the United States who are bidding on public tenders in the health and education sectors.</p> <p>Municipalities impose penalties up to 25% on entities having an “establishment” in the United States.</p> <p>For invitation-only tenders, municipalities must invite only companies with a presence in Quebec or those with local commercial partners.</p>	<p>“Establishment” means a place where an enterprise carries on its activities on a permanent basis, clearly identified under its name and accessible during regular business hours.</p>	<p>This Regulation applies to supply contracts for</p> <ul style="list-style-type: none">(1) computer hardware and software;(2) medical supplies and equipment;(3) pharmaceutical products; and(4) scientific instruments.

Nova Scotia				
Nova Scotia	Official Statement (March 4, 2025)	American businesses can no longer bid on provincial business. Actively seeking options to cancel existing contracts and reject bids outright.	N/A.	N/A.
New Brunswick				
<i>Currently no identifiable provincial responses to U.S. tariffs re procurement.</i>				
Newfoundland and Labrador				
Newfoundland and Labrador	Official Statement (March 4, 2025)	Will review and halt procurement from the US “where possible”.	N/A.	N/A.
Prince Edward Island				
PEI	Report, Tariff Response Plan (March 4, 2025)	Review all government contracts with US businesses and organizations and look to limit procurement for US based companies moving forward.	N/A.	N/A.
Yukon				
Yukon	Official Statement (February 2, 2025)	Reviewing territorial government procurement policies to exclude US companies and minimize the purchase of US goods and services.	N/A.	N/A.
Nunavut				
Nunavut	Press Release (March 4, 2025)	Reviewing procurement policies to reduce or eliminate purchases from US companies where possible.	N/A.	N/A.

Local Government (non-BC)				
Calgary	City website	To counteract U.S. tariffs, the City introduced certain measures to their procurement practices effective as of March 31, 2025.	N/A.	<p>Goods or materials (Large, competitive procurements over \$75K)</p> <ul style="list-style-type: none"> - The Social Procurement Questionnaire weighting will be increased to 10%. This is up from the current range of five to 10%. <p>Services, including consulting and construction (Large, competitive procurements over \$200K)</p> <ul style="list-style-type: none"> - Where possible, the Social Procurement Questionnaire weighting will be increased to 10%. The range will stay within the five to 10% range and we will review service procurements on a case-by-case basis.
Toronto	Staff Report (March 18, 2025) Mayor's Economic Action Plan in Response to US Tariffs (March 26, 2025)	<p>The Mayor of Toronto's Economic Action Plan in Response to US Tariffs includes proposed amendments to the City of Toronto's procurement bylaw, including: (i) limiting new competitive procurements to Canadian Suppliers, where they are under the applicable Canada-European Union Comprehensive Economic and Trade Agreement (CETA) thresholds, and including language "<i>where appropriate and possible, to favour Canadian Suppliers and Trade Partner Suppliers, which includes suppliers from the European Union and the United Kingdom</i>" for procurements that exceed the applicable thresholds; and (ii) restrictions on "USA Based Suppliers".</p>	<p>CANADIAN SUPPLIER means a supplier, manufacturer or distributor of any business structure that conducts its activities on a permanent basis in Canada. The business either:</p> <ul style="list-style-type: none"> A. has its headquarters or principal place of business in any province or territory of Canada; or B. has at least 70% of its employees in Canada at the time of the bid submission of the applicable procurement process; or C. is a Canadian Business Subsidiary. <p>CANADIAN BUSINESS SUBSIDIARY means a corporation operating in Canada, that acts as a supplier, manufacturer or distributor of goods and services and is controlled by a parent corporation outside of Canada, and where:</p> <ul style="list-style-type: none"> A. the business subsidiary has permanent offices or production facilities, and B. a minimum of 70% of the deliverables will be provided by employees based in Canada. <p>TRADE PARTNER SUPPLIER means a supplier, manufacturer or distributor of any business structure that conducts its activities on a permanent basis within a country that is a party</p>	<p>During any period when retaliatory tariffs are imposed by the Federal Government of Canada:</p> <ul style="list-style-type: none"> a. For all new competitive procurements, Canadian Suppliers will be the only Suppliers eligible to bid on the City of Toronto's solicitations that are under the Canada-European Union Comprehensive Economic and Trade Agreement (CETA) threshold (\$353,300 for goods and services and under \$8,800,000 for construction for 2025). For procurements over the CETA threshold, PMMD will include language in the City of Toronto's solicitations, where appropriate and possible, to favour Canadian Suppliers and Trade Partner Suppliers, which includes suppliers from the European Union and the United Kingdom. b. USA Based Suppliers may be deemed ineligible to bid on competitive City of Toronto solicitations if it is deemed by the City Manager, or their delegate, and Chief Procurement Officer, in consultation with the City Solicitor, to be in the best interest of the City to not allow bids from USA Based Suppliers. c. Non-competitive procurement may be undertaken with a USA Based Supplier only if, in the opinion of

		<p>to an international trade agreement applicable to municipalities in Canada. The Trade Partner Supplier either:</p> <ul style="list-style-type: none">A. has its headquarters or main office within a country that is a party to an international trade agreement applicable to municipalities in Canada, orB. has at least 70% of its employees based in a country that is a party to an international trade agreement applicable to municipalities in Canada at the time of bid submission deadline of the applicable procurement process. <p>USA BASED SUPPLIER means a supplier, manufacturer or distributor of any business structure that conducts its activities on a permanent basis in the United States of America (“USA”). The business either:</p> <ul style="list-style-type: none">A. has its headquarters or principal place of business in any state or territory of the USA; orB. has at least 70% of its employees in the USA at the time of the bid submission of applicable procurement process.C. USA Based Supplier does not include a Non-American Business Subsidiary. <p>NON-AMERICAN BUSINESS SUBSIDIARY means a business subsidiary controlled by a parent corporation operating on a permanent basis in the United States of America (“USA”), that acts as a supplier, manufacturer or distributor of goods, where:</p> <ul style="list-style-type: none">A. the business subsidiary has permanent offices or production facilities outside of the USA; andB. a minimum of 70% of the deliverables will be provided by employees based outside of the USA. <p>NON-AMERICAN SUPPLIER means a supplier, manufacturer or distributor of any business structure that does not meet the definition of “USA Based Supplier”.</p>	<p>the City Manager, or their delegate, and Chief Procurement Officer, in consultation with the City Solicitor, it would be in the best interest of the City.</p> <p>d. Limited solicitations may be undertaken where, in the opinion of the City Manager, and Chief Procurement Officer, in consultation with the City Solicitor, it would not be in the best interest of the City to solicit open competitive bids.</p> <p>Should there be a change to monetary thresholds in the Canadian Free Trade Agreement, the Trade and Cooperation Agreement between Ontario and Quebec, or the Canada-European Union Comprehensive Economic and Trade Agreement, the Chief Procurement Officer shall be authorized to immediately apply thresholds which align with the agreements, and report to the appropriate Standing Committee and Council on the change no later than the second regular meeting of Council after applying the change.</p>
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Vaughan	Staff Report (March 4, 2025)	Recommends that new evaluation processes be used for new procurements. Staff indicated that they are “exploring definitions that properly address Council’s objectives of protecting Canadian jobs.”	Q and As define Canadian Supplier, American Supplier, and Other Supplier. Canadian Supplier means a supplier, manufacturer or distributor of any business structure, including a subsidiary of a foreign business , that conducts its activities on a permanent basis in Canada. The business, at the time of the bid submission of the applicable procurement process: <ul style="list-style-type: none">• has legal status in Canada (e.g. incorporated in, or business name registration with Canada, a Canadian province or territory) and has met all necessary legal requirements to operate in Ontario; and• has permanent offices or production facilities in any process or territory of Canada, from which it regulatory conducts business activities; and• will provide goods that are made in Canada, as that term is understood by the Competition Bureau of Canada, and/or have the proposed deliverables provided by a workforce of which at least 51 per cent is based in Canada. American Supplier means a supplier, manufacturer or distributor of any business structure that conducts its activities on a permanent basis in the US. The business: <ul style="list-style-type: none">• has its headquarters or principal place of business in any state or territory of the US; and• will have the proposed deliverables provided by a workforce of which at least 51 percent is based inside the USA. Other Supplier means a supplier, manufacturer or distributor of any business structure hat is not a Canadian or an American Supplier.	For procurements below \$133,800 (Goods and Services) or \$334,400 (Construction) (“Low to Mid Value Procurements”), the City will leverage opportunities to favour goods made in Canada or services provided by Canadian businesses by increasing the Low Dollar Purchase threshold and increasing the use of invitational procurements and collaborative procurement organizations. For procurements valued at or above \$133,800 (Goods and Services) or \$334,400 (Construction) (“High Value Procurements”), the City will leverage collaborative procurement organizations, as well as apply evaluation methods to competitive procurements that would favour non-American vendors.
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Local Government in BC				
Vancouver	Staff Report (March 4, 2025)	Staff report details that possible next steps include a policy decision to exclude U.S. suppliers from specific procurements. This would involve accepting the risk that such a policy could increase costs for Vancouver taxpayers. To avoid potential misalignment, staff recommend that Council defer any decision regarding exclusion of U.S. goods from City of Vancouver procurement processes pending mor clarity regarding federal and provincial non-tariff responses.	N/A.	N/A.
Vancouver	Motion See also: Meeting minutes (February 11, 2025)	Requiring city's contracts be awarded to Canadian businesses whenever possible.	N/A.	N/A.
Coquitlam	News article (March 10, 2025)	Reviewing where local products and services can be prioritized – full details of the plan expected at the end of April.	N/A.	N/A.
Port Moody	News article (March 9, 2025)	Consulting with regional colleagues on procurement practices. Report on the cost impacts to city's procurement scheduled to be presented on March 18.	N/A.	N/A.