



TRANSPORT ACTION ONTARIO

(formerly Transport 2000 Ontario)

Advocating for Sustainable Public and Freight Transportation
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Carolyn Bennett, MP (Toronto-St. Paul's)
Chrystia Freeland, MP (Toronto Centre)
Adam Vaughan, MP (Trinity-Spadina)
House of Commons
Ottawa, Ontario

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Dear Carolyn, Chrystia and Adam:

Rail Safety in Canada

Thank you for the opportunity to speak at your Community Forum on November 28. We found it very stimulating. We thought it might be helpful to summarize the position of Transport Action Ontario as expressed at the meeting.

Freight and passenger rail has many benefits, including urban congestion relief, reductions in greenhouse gases and other environmental impacts, and increased public safety vis-à-vis road transport. There are numerous untapped ways to build on these benefits to improve rail safety in Canada. We can start in the short term with federal regulatory and budgetary changes, including an increase in the funding of Transport Canada's Rail Safety Directorate to allow for the hiring of an adequate number of safety inspectors and auditors.

On the industry side of the issue, the effectiveness of the geographic coverage of the railways' electronic wayside inspection system also needs to be assessed to ensure the companies are deploying an adequate number of hot wheel bearing, dragging equipment, shifted load and wheel impact load detectors, especially within urban areas.

In addition, the regulated plan to eliminate the deficient portion of the shipper-owned North American DOT-111 tank car fleet used in Canada could be accelerated. As promised at the Community Forum, we will get back to you with more details on phase-out schedules.

As well, the federal regulatory process allowing railways to abandon unprofitable lines that have strategic value in the movement of dangerous commodities should be modified to support the retention of these lines. Various approaches are possible, based largely on the rail infrastructure and service preservation policies that have been enacted by some of the more forward-looking state and regional governments in the U.S.

There are a number of medium-term items that should also be initiated. These include a national program for the implementation of positive train control (PTC), more funding of road-rail grade separation projects and investment in rail line capacity increases. The application of PTC is now under

way in the U.S. under a public-private partnership (P3) between the federal government and the privately-owned freight railways.

In the longer term, there are at least two programs to be considered. The first should be the rebuilding of the recently-abandoned section of Canadian Pacific's Ottawa Valley line as a mandated route for all CP and CN dangerous goods traffic moving between western Canada and Montreal or points east. This would serve as a strategic bypass route to reduce the haulage of dangerous commodities – especially western crude oil – through Toronto and other well-populated points in southern Ontario. It would also relieve pressure on the congested CN and CP routes south of Sudbury through Toronto to Montreal.

Secondly, initiate a GTHA rail freight improvement project that would involve all levels of government and the railways in the creation of a single, secure and efficient route for all CP and CN freight traffic around the region. It would use elements of the existing system and new track segments on publicly-owned transportation corridors such as Highway 407 to divert freight away from the more densely-populated portions of the GTHA.

Such a wide-ranging rationalization and improvement of the GTHA's rail freight grid would also yield commuter and intercity rail passenger benefits, eliminating freight from key routes that are vitally necessary to improvements of the GO and VIA systems. This issue was covered in greater detail by our research and policy colleague, Greg Gormick, in a recent edition of *The Toronto Star*. We are including a copy of that article.

Many of these ideas require significant infrastructure investment, which is only likely through the development of a clear national rail policy, which Canada does not currently possess. We believe that, due to decades of competition from trucks operating without paying all the costs they impose on our publicly-funded highways, the privately-funded railways cannot generate sufficient revenue to fully cover the capital cost of investments that would have long-term private and public sector benefits, including safety improvements.

Canada needs to take a page from the U.S. approach, where P3s with clearly demonstrated public and private benefits are increasingly being employed to deliver improved rail freight, passenger and commuter infrastructure and service. So far, Canada has largely failed to engage in such joint investments to improve the safety, efficiency and utility of our railways as main components of our national multi-modal transportation system.

In all of the issues we've outlined above, the federal government needs to take the leadership position, working with other levels of government and the rail industry.

We look forward to continued dialogue on these matters.

Yours truly,

Peter Miasek
President, Transport Action Ontario

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