



TRANSPORT ACTION ONTARIO

(formerly Transport 2000 Ontario)

Advocating for Sustainable Public and Freight Transportation

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Ms. Karen Clark,
Ministry of the Environment and Climate Change.
VIA e-mail.

June 21st 2016

Dear Ms. Clark,

Freight modal shift: Environmental and economic benefits

Transport Action Ontario is a donor funded, not for profit advocacy group with a mandate to support improved passenger and freight transportation in Ontario. We participated in your webinar on June 20th and asked whether the Climate Change Action Plan had considered the environmental benefits of transferring more freight away from roads to railways.

While we are pleased with the Plan's initiative on the role of short-line railways your responding panel member indicated that no consideration had been given to the potential role of increased freight intermodal in overall carbon emissions reduction. We believe this to be a significant missed opportunity for the following reasons:

1. Rail-hauled freight emits approximately eight times less carbon than highway-hauled freight per ton/mile.
2. Truck transportation growth, even with emerging technologies, will continue to result in an escalating increase in Ontario's carbon emissions and therefore negate many of the other initiatives contained in the Plan.
3. The continued expansion of Ontario's major highways to accommodate a growing long-haul truck population will directly generate more carbon emissions during construction and maintenance while inhibiting overall shift to lower carbon methods of transportation over the longer term.

For these reasons we believe that Ontario's climate-change mitigation objectives would be more achievable, infrastructure costs lowered and economic development facilitated by a provincial policy to encourage the transfer of long-haul freight from roads to rails. This could be achieved by assisting short-line and main-line railways develop regional intermodal or distribution hubs at strategic locations within the Province. Trucking would then provide shorter-distance deliveries and could better utilise lower carbon fuel with lower energy density without sacrificing payload and performance.

Such a concept, with the same environmental and economic drivers, is under early consideration by the County of Oxford as part of its "Future Oxford" sustainability initiative. The southern part of the county is at the confluence of two major highways, two main-line and one short-line railway and is ideally positioned for an intermodal or regional distribution hub. In addition to reducing the County's carbon footprint it is seen as a facilitator of agricultural and industrial export growth. The very progressive and climate-supportive approach by Oxford County could facilitate a pilot project with the Province in cooperation with other stakeholders.

While modal freight transfer in pursuit of lower carbon emissions is our initial comment on Ontario's Climate Change Action Plan there are other important vectors that Transport Action Ontario will comment on shortly. In the interim we thank you for sharing the plan details and inviting our input.

Yours sincerely,

Ken Westcar

Kenneth Westcar

Board Member,

Transport Action Ontario