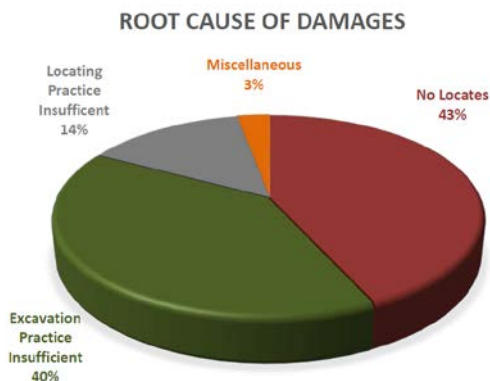


Mr. Richard Paton, Chair
Railway Safety Act Review 2017-2018
255 Albert Street
Ottawa, Ontario
K1P 6A9 Canada

Dear Mr. Paton;

Re: CCGA Submission to the Railway Safety Act Review

The CCGA is the unified voice of Canadian national organizations and associations sharing mutual damage prevention and public safety solutions. The best method to prevent damage to underground infrastructure is to follow the CCGA's Best Practices; beginning with a locate request prior to any ground disturbance. It is only the first critical element in a series of steps designed to maintain the integrity of underground infrastructure during ground disturbance.



DAMAGE BY TYPE OF EXCAVATION

When construction or excavation activity is in the vicinity of a transmission pipeline, a locate request will trigger the minimum requirements of legislation and regulation, and may also initiate CSA Standards if they have been incorporated into legislation by reference. In addition, diligent ground disturbers should also recognize industry Best Practices. Designed by committee, Best practices present the highest form of safety. In the case of railway excavation or construction near or across a transmission pipeline, the Crossing Agreement process is a recognized Best Practice that needs to be consistently applied across Canada – regardless of jurisdiction. Crossing Agreements allow pipeline operators to know about upcoming crossings or excavation work in the vicinity of

their assets so they can work with the party performing the activity to prevent incident. Unauthorized activities pose serious threats to workers, pipeline safety and the safety of others nearby.

Last week, the CCGA released the 2016 DIRT Report (Damage Information Reporting Tool). Almost 12,000 damages were *voluntarily* reported into DIRT and among the root causes, 40% of damages were caused by insufficient excavation practices. Unless leaders within the digging community recognize the value of adhering to Best Practices rather than simply maintaining minimum legislative requirements, incidents will continue to occur.

Yours truly,

Mike Sullivan
Executive Director - Canadian Common Ground Alliance