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VIA EMAIL: secretariat@reviewcta-examenltc.gc.ca

Hon. David Emerson, PC, MP
Chair, *Canada Transportation Act Review*
Canada Transportation Act Review Secretariat
350 Albert Street, Suite 330
Ottawa, ON
K1A 0N5

Dear Mr. Emerson,

Please accept this as CSA Group's submission to the *Canada Transportation Act (CTA) Review*. We appreciate that the *CTA* is the umbrella economic legislation for Canada's national transportation system and that many important national transportation issues are under its purview. We reviewed your Discussion Paper with interest and note that you are soliciting feedback on how safety and well-being concerns related to rail transportation (including the movement of dangerous goods) through communities can be addressed. Our comments related to this particular issue are found below, for your consideration.

As background, CSA Group (formerly known as the Canadian Standards Association) was founded in 1919 and is an independent not-for-profit standards development organization which, at present, develops standards in over 55 different areas and sectors. Based in Toronto, CSA Group employs over 1,800 people in 35 offices in 14 countries. We are recognized as a world leader in standards development, and work with governments and organizations ensuring that their operations and products are safe and adhere to the most rigorous standards.

Every day, CSA Group works with government and private sector organizations testing and certifying products for safety and performance requirements, and developing leading-edge, consensus-based standards. Our partners - manufacturers, retailers, business, academia, consumers and government - rely on CSA Group and organizations like ours to ensure the products they build and processes they follow are safe.

In light of recent tragic events, Canadians are now more aware of and concerned about railway safety and want assurances that Canada's regulatory system is up to the challenge of transporting increasing volumes of dangerous goods in as safe a way as possible. Coupled with this is the reality that governments at all levels have limited resources and finite capacity. That is where government can and should rely on expert third-parties, who can play an important, neutral role in developing standards that can be incorporated into regulation, or help audit current safety management practices, either with government or industry, to ensure those standards and practices are being adhered to. The Government of Canada should seriously consider this option.

In addition to standards development and third-party independent audits, training is also an important part of ensuring the effectiveness of safety management systems and their enforcement. Engaging external third-parties with proven expertise in delivering accredited training, skills assessment and competency testing for those involved in the transportation of dangerous goods (TDG) would be another way to address escalating public concerns about safety and well-being related to this kind of shipping.

CSA Group commends the efforts the federal government has taken to date to ensure that Canada's TDG framework – recognized as one of the safest in the world – is fully enabled in order to oversee the safe and reliable movement of TDGs in Canada, enhance the operations of organizations and businesses involved in moving these goods, and most importantly, protect Canadians. CSA Group shares this same commitment to safety and we hope to be able to support the Government of Canada in its important work in this regard.

We would be pleased to address any questions with regard to the issues raised in this submission. I can be reached directly at the contact information below. I would also be pleased to participate in any upcoming in-person consultation meetings associated with the CTA Review that will be held in 2015.

In the meantime, good luck to you and your colleagues with your important work.

Sincerely,



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Executive Vice President, Government Relations
& Corporate Secretary

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