



January 26, 2015

Canada Transportation Act Review Secretariat  
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To the Canada Transportation Act Review Secretariat:

On behalf of the Association of Manitoba Municipalities, I would like to provide some comments regarding the Canada Transportation Act Review.

The AMM supports the position of the Federation of Canadian Municipalities (FCM) on the Canada Transportation Act Review:

In particular, we would like to emphasize the following points:

- **Rail safety and the transportation of dangerous goods by rail:**  
The AMM is pleased with the work completed to date by the FCM along with Transport Canada to improve rail safety since the tragedy in Lac-Mégantic. However, additional measures are required, including the recommendations made by the Transportation Safety Board in its final report, and the need for risk assessments on rail safety that take municipal concerns into account.
- **Rail freight service:**  
FCM has adopted a position supporting the need for increased railway capacity to meet growing demands for exporting goods, as well as the domestic movement of commodities.
- **Rural airport viability:**  
The AMM would like to see a review of the restricted eligibility criteria for the Airport Capital Assistance Program (ACAP) to allow small airports without scheduled passenger service to make critically needed infrastructure investments.
- **Northern and remote airports:**  
Additional funding is needed to address the airport infrastructure deficit in Manitoba's northern and remote airports.

Additionally, AMM supports the Manitoba government's position that there needs to be improved rail competition to improve grain movement; there must be a shift of the power balance back to shippers through enforceable and meaningful service level agreements; and corridor and capacity issues for Manitoba shippers must be kept front and centre.

Finally, the AMM also believes current legislation and regulations do not require railways to fully explore all available options before resorting to rail line abandonment. The consequences of rail line abandonment can be very serious for communities and shippers, as there are both economic and environmental challenges. The AMM would support changes to empower the Canadian Transportation Agency to investigate abandonment activities of rail carriers that preclude reasonable opportunities for stakeholders to preserve infrastructure, and to compel a railway to undertake any steps necessary to ensure a reasonable opportunity is provided.

Thank you for this opportunity, the AMM looks forward to results of this review.

Sincerely,



Doug Dobrowolski  
President