

# WESTERN GRAIN ELEVATOR ASSOCIATION

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February 22, 2019

*Sent via e-mail*

Canadian Transportation Agency

Attention: Mr. Scott Streiner  
Ms. Lidia Lebar

Dear Ms. Lebar and Mr. Streiner,

## **Re: Canadian Transportation Agency Own Motion Investigation – Vancouver Rail Service**

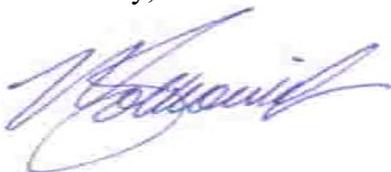
The members of the Western Grain Elevator Association have learned a great deal during the above noted investigation process. We would like to add a new perspective to our views on the embargo and permitting process.

The participants in the grain sector manage their pipelines. Shippers require terminal authorization before loading a train and sending it through to destination for unloading. We are not privy to the logistic practices of other industries, and incorrectly assumed that all other sectors did the same. It has been brought to our attention that this is not necessarily the case. We understand that, in some sectors, shippers in aggregate will order more railcars than the destination unloading facility can accommodate.

In these situations where pipelines are not being managed by shippers and unloaders in accordance with unloading capacity, we understand that the railway company will have no other option than to determine some method for staging loads and bringing them to the unloading facility at a rate consistent with the volume that can be accepted. In the recent situation, the railways used an embargo and permitting process. While the WGEA maintains its view that embargoes and permitting processes may not be supported by Canadian law, we also understand that the railway companies will require some tool to manage a shippers' pipeline, where the shipper is unable or unwilling to manage it itself. Ideally, this would be done in a collaborative fashion between the shippers in question and the railway company, as opposed to unilaterally.

Thank you for accepting our updated views on this matter.

Yours truly,



Wade Sobkowich  
Executive Director