



April 25, 2019

Mr. Scott Streiner, Chair and CEO  
Canadian Transportation Agency  
Ottawa, ON K1A 0N9

Dear Mr. Streiner:

**Re: Proposed Regulations to Amend Regulations under the *Canadian Transportation Act***

I am writing to you on behalf of the Saskatchewan Association of Rural Municipalities (SARM). SARM is the independent association that represents rural municipal governments in Saskatchewan and is the principal advocate in representing them before senior governments. All of Saskatchewan's 296 rural municipalities are voluntary members of SARM. The Association takes direction from its members and forms its policy accordingly.

In August 2018, SARM provided comments for the consultation on Canada's Transportation Agency's (CTA) Regulatory Modernization Initiative. After reviewing the proposed regulations to amend regulations under the *Canadian Transportation Act* published in Part I of the *Canada Gazette* on March 30, 2019, we are pleased to see that some of our feedback provided has been incorporated.

In 2018, we emphasized the importance of the *Transportation Modernization Act* and related regulations ensuring that the CTA and Transport Canada have adequate mechanisms to keep railways accountable. Accordingly, SARM supports the implementation of administrative monetary penalties to keep railways accountable in the proposed regulations. In our original submission, SARM also recommended that railways be responsible for firefighting costs in all cases where the fire starts in the rail right-of way. As such, the SARM Board of Directors supports the proposed regulations providing clarity around responsibility for fire fighting costs for fires sparked in railway right of ways.

Thank you for the opportunity to comment on the proposed regulations to amend regulations under the *Canadian Transportation Act*. We look forward to continuing to work with the CTA and Transport Canada to improve rail transportation in Canada.

Sincerely,

A handwritten signature in black ink that reads "Ray Orb". The signature is written in a cursive, slightly slanted style.

Ray Orb  
President