June 10, 2026

Transport Canada
Tower C, Place de Ville, 330 Sparks St
Ottawa, Ontario
K1A 0N5
TC.engagement.TC@tc.gc.ca

Re: Strengthening One Canadian Economy through Trade and Transportation

Canadian Canola Growers Association (CCGA) and the Grain Growers of Canada (GGC) welcome the consultation from Transport Canada, Strengthening One Canadian Economy Through Trade and Transportation.

CCGA represents 40,000 canola farmers on national and international issues, policies, and programs that impact their farm's success. Canola is the largest source of crop farm cash receipts, earning Canadian farmers $12.9 billion in 2025. The value of canola to the Canadian economy has more than doubled in the past decade and now contributes an average of $43.7 billion annually to Canada's GDP. The canola sector accounts for 206,000 Canadian jobs and $16.3 billion in wages. Exports are a strong contributor to canola's success – more than 80% of all canola grown in Canada is exported as seed, oil, or meal: valued at $12.6 billion in 2025 alone.

GGC represents over 100,000 grain producers through 15 national, provincial, and regional grower groups. Our members steward 120 million acres of land to grow food for Canadians and for 160 countries around the world, creating $45 billion in export value annually. As a farmer-funded association for the national grains sector, GGC champions federal policies that support the competitiveness and profitability of grain growers across Canada.

Thank you for the opportunity to provide perspective to this consultation. The Canadian grain sector is dependent on Canada's two Class 1 railways to move products across the country for domestic use and to Canada's ports for global export. No other economically or physically viable options exist for the transportation of grain. Approximately 94% of Canadian grain is transported by rail and approximately 70% of Canada's total annual grain production is exported.

CCGA and GGC supports, in principle, the overarching goals contained within the consultation document such as reducing red tape, attracting investment and infrastructure development and increasing Canada's competitiveness in the global market. That stated, the specific details of how government may do this, through policy, regulatory or legislative change needs to be fully understood by stakeholders. There are four specific issues noted in the consultation document that could directly impact Canadian grain farmers and these are briefly addressed below. An illustration of how the Federal Government should play an active role on a current issue to achieve these broad policy outcomes is also presented.

Extended Interswitching

Within the consultation document, under the heading of "proposed changes [that] would simplify rules and approvals while maintaining Canada's high standards", is a proposal "*explore options to facilitate the efficient movement of grain and the capacity of the transportation system in meeting the needs of the sector*". During Transport Canada's stakeholder briefings convened on May 26th and 27th, it was confirmed this is referring to a potential extended interswitching pilot.

Grain farmers support policies such as extended interswitching that promote competition in the railway marketplace. That stated, a 48-month timebound extended interswitching pilot will likely have minimal, lasting pro-competitive effects in the market.[1]

> **Extended interswitching needs to be made permanent to generate the intended long-term policy outcomes of increasing competition between the railways and providing shippers with potential new options for executing their business.**

Shippers will be reluctant to fully utilize this provision in their commercial contracting with the railways as it is timebound and will sunset. Only once extended interswitching is made permanent will farmers benefit from this policy, resulting in better rail service, improved efficiency and better access to markets for farmers and shippers.

Canadian Ports

The Canadian grain sector is critically reliant on ports as grain companies own and operate terminals across Canada that facilitate the export of Canadian grain around the world. Grain terminal and exporter representatives have been actively involved in the 2018 Port Modernization Review process and subsequent discussions, with no fundamental changes occurring in the interim. Port terminal operations, such as at the Port of Vancouver, serve as a major gateway to Canada's largest grain customers in Asia, the Middle East and South America.

As Transport Canada considers options regarding the port governance framework in Canada, **modernizing port governance in Canada should not include options for privatization of ports**. The grain sector is monitoring this debate in the aviation sector and stresses that this is not an appropriate governance and operating model for Canadian ports. Canada's ports are national public assets that facilitate the export of grain and other commodities around the world. Turning them over to private operation is an inappropriate option, fraught with significant policy, economic and operational issues of putting them under monopoly control.

---

[1] Grain sector stakeholders have summarized their views on extended interswitching on the "Flip the Switch" webpage.

Data Collection – Export Sales Reporting

For the grain sector, supply chain efficiencies start at the farm. Both CCGA and GGC support proposed amendments to the *Canada Marine Act* and *Canada Transportation Act* that would enable enhanced oversight of investments and supply chains. As stated in the discussion document, this could include “the creation of a regulatory authority to require the production of data from terminal operators and others operating at ports to support visibility of supply chain performance, operating agreements, commercial activities, and investment activities and their impact on infrastructure and competition.”

A coalition of grain farmer associations are advocating for Export Sales Reporting. Canada is one of the most export-driven grain economies in the world. Producers are expected to read global demand signals, manage risk, and compete head-to-head with U.S. and other regions. Yet, unlike our major competitors, Canadian producers do not have access to timely export sales data – meaning we're operating at a competitive disadvantage. This data is vital because it reveals actual demand in real-time as it materializes.

A potential model could be to include daily reporting of large sales above a defined tonnage threshold, and weekly aggregated reporting by commodity and destination. Reporting would exclude contract pricing and commercially sensitive data. This initiative is not about price controls, new regulatory burdens, or market interference. It is about improving price discovery and reducing uncertainty for farmers and strengthening the functioning of markets and supply chain efficiency.

Strengthening Trade Corridors, Supply Chain Resilience and Canada’s Competitiveness – An example of the Federal Government’s role

Beyond the broad and undefined proposals outlined in the consultative document, there is a key role that the federal government can assume to advance planning, investment and construction of major projects that have significant impact to supply chain resilience in Canada – that is to **exercise federal leadership on complex projects, such as with the Second Narrows Rail Bridge,** as a clear example.

In April 2026, a letter signed by over 20 organizations representing shippers, exporters and producers from the agriculture, fertilizer, chemical, mining, energy and other bulk commodities was sent to the Prime Minister and Minister of Transport regarding the Second Narrows Rail Bridge in the Port of Vancouver. This was in response to the mechanical failure that occurred in late February, which rendered the lift bridge inoperable for several days. Although railway operations were able to be sustained during the repairs (as it was in the down position), it blocked commercial vessel traffic originating from east of the structure, including vessels transporting energy products from the Trans-Mountain pipeline and other shippers.

Approximately one-third of the total volume of products exported from the Port of Vancouver transit this rail bridge that provides access to and from the export terminals located on the North Shore. In this instance, if railway operations had been affected, this would have produced serious negative effects for exports of Canadian grain and other commodities from the Port of Vancouver and would have produced knock-on supply chain effects that would have reverberated across Western Canada and the country.

Although the bridge is a private asset, it is a critical supply chain structure of national importance and there is a clear leadership role the Government of Canada to assume. We reiterate the recommendation that:

> **The Government of Canada prioritize a long-term solution for the Second Narrows Rail Bridge that reflects the national importance of this corridor, the shippers that depend on it, and the economic growth potential this corridor holds.**

In doing so, the Government of Canada should designate the Second Narrows Corridor as a major project of national significance and exercise federal leadership in convening the necessary parties. The railways, the Port of Vancouver, terminal operators and shippers need to find alignment around long-term options such as such as bridge and tunnel replacement or twinning, and the establishment of a financing, governance and permitting framework that supports this critical project and corridor of national economic significance.

> **This infrastructure, although privately held by a corporation, is a national, public good. The identified solution to this issue must be implemented without downloading the cost to port users through increased port fees, increased rail rates, etc.**

The incident with the bridge in February should serve as a clear, timely reminder that certain pieces of major aging infrastructure that currently support the Western Canadian grain supply chain (and the broader economic activity of the country) are vulnerable and any major incident could be disastrous.

Thank you for the opportunity to contribute to this consultation. We look forward to seeing more details that may come out of this process. We are available at any time to discuss any specific draft proposals that Transport Canada may be considering, prior to their formal publication.

We thank you for the opportunity to provide comment to this important consultation.

Sincerely,

Originally signed by,

Rick White
President & CEO
Canadian Canola Growers Association

Bruce Burrows
Executive Director
Grain Growers of Canada