Lui, Rachel

From:

Hart, Beata

Sent:

Friday, April 24, 2015 1:57 PM

To:

Miller, Mark; Conrad, Mark; Lui, Rachel

Cc:

Raitt, Blair

Subject:

ARC CP audit review

Attachments:

CP_Fatigue_management_Audit_report-2015-04-17.docx

Hello,

I am contacting you as a member of the audit review committee for the CP Fatigue management national audit. The draft of the audit report is now ready for you input.

Audit procedure specifies a seven working days timeframe for this review, which would brings us to Monday, May 4th. Please let me know if this is not feasible and if additional time is needed. I will ensure to adjust the schedule accordingly and obtain the necessary approval.

Based on the comments received and their complexity, a meeting (conference call) might be required to address your concerns. This will be determined once all comments are received. If, after your review, you would like a meeting nonetheless, please let me know and I will ensure to arrange one.

Below, I included the excerpt from the audit procedure that outlines responsibilities of the review committee, I hope you'll find it helpful.

If you have any questions please do not hesitate to contact me. Best Regards,
Beata

Audit Procedure

The ARC is responsible for the following:

Audit Review Committee (ARC)

- Reviews the audit details and provides comments as appropriate;
- Reviews the audit report and provides feedback regarding the following:
 - supporting evidence (in regards to the findings);
 - additional technical advice (when applicable);
 - format;
 - readability;
 - consistency; and
 - clarity in wording

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP), considering Safety Management System Regulations (SMS), Transport Canada Work Rest Rules for Railway Operating Employees (WRR) and Fatigue Management Plans, Requirements and Assessment Guidelines" was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as required by the WRR, and as defined by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the WRR as well as their implementation as defined by the Railway. This assessment was carried out through record reviews, observations and interviews with personnel.

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team then proceeded to review the records provided and interviewed selected members of the CP' management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits were to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes the special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

A closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Alyth facility. Next steps were presented but, due to audit activities still being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by the Railway Association of Canada and provided by CPR (February 2011);
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003);
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003);

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- s.20(1)(b) s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003), and;
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

Eleven findings were reported as a consequence of this audit. Findings 771571 and 771601 were identified as

Details are provided in the Findings section of this report.

Detailed descriptions of those findings are provided in the Findings section of this report.

The Railway is encouraged to demonstrate how they intend to enhance railway safety by providing a corrective action plan to each of findings of deficiency, within 30 days of the issues of this audit report. The Corrective Action Plan should reference the Transport Canada audit findings and detail the Railway's proposed corrective actions to address them. Each corrective action should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. An example Corrective Action Plan template is attached to this report and it may be used.

Introduction

Pursuant to the Railway Safety Act, Transport Canada has conducted a systematic, detailed assessment of railway company policies, processes and procedures to (a) evaluate them against the documentation requirements of the RSMS Regulations; and (b) verify the implementation and effectiveness of said policies, processes and procedures.

Audit Scope

The scope of this audit was to verify the implementation of the Fatigue Management Plans as defined by CP, considering the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

The following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities;
- 2(d) Compliance with applicable regulations, rules, standards and orders;
- 2(e) Risk management process;
- 2(h) Skills, training and supervision, and;
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

s.20(1)(c) s.20(1)(d)

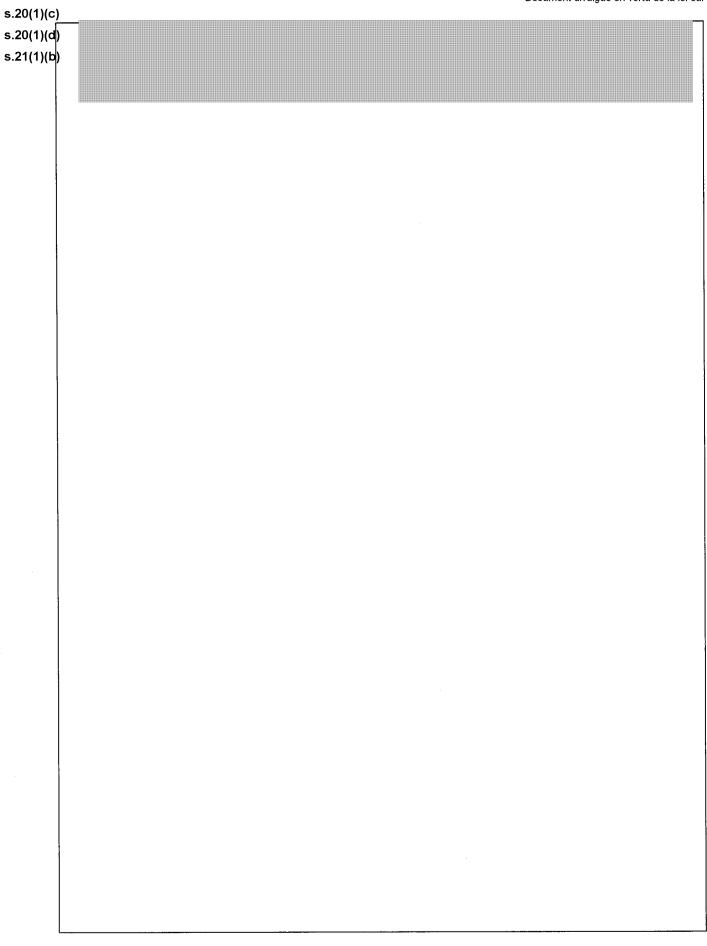
Audit Findings

s.21(1)(b)

Finding ID:	771571	Process:	2(d)
Regulatory Requ	uirement:		
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- Work/rest rules t	or railway operatin	g employees, TC O 0-1	40, February 2011
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	Work/rest rules for ra	nilway operating en	mployees, TC O 0-140, Fe	bruary 2011,	
	Description of I	Finding:			
	Supporting Deta	ails:			
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s.20(1)(b) s.20(1)(c) s.20(1)(d) Finding ID: 771765 2(b) Process: s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:



s.20(1)(b) s.20(1)(c) Finding ID: 771781 Process: 2(h) s.20(1)(d) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component; 2(h) systems for ensuring that employees and any other persons to whom the railway company grants access to its property, have appropriate skills and training and adequate supervision to ensure that they comply with all safety requirements; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:

s.20(1)(c) s.20(1)(d) 2(d) Finding ID: 771786 Process: s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable: (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:

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Finding ID:	771831	Process:	2(i)		
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s.20(1)(b)s.20(1)(c)s.20(1)(d) 771875 2 (d) Finding ID: Process: s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Audit Report

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Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

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s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

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Introduction

Pursuant to the Railway Safety Act, Transport Canada has conducted a systematic, detailed assessment of railway company policies, processes and procedures to (a) evaluate them against the documentation requirements of the SMS Regulations; and (b) verify the implementation and effectiveness of said policies, processes and procedures.

Audit Scope

The scope of this audit was to verify the implementation of the Fatigue Management Plans as defined by CP, considering the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

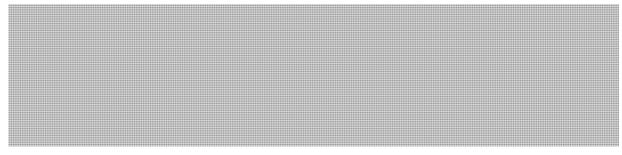
The following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities;
- 2(d) Compliance with applicable regulations, rules, standards and orders;
- 2(e) Risk management process;

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)
- 2(h) Skills, training and supervision, and;
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

The scope includes all records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, from January 2010 to present.

Other Issues



s.20(1)(c)

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s.20(1)(d) Audit i	

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s.20(1)(b) s.20(1)(c) Finding ID: 771601 Process: 2(d) s.20(1)(d) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway commitment: Work/rest rules for railway operating employees, TC O 0-140, February 2011, Description of Finding: Supporting Details:

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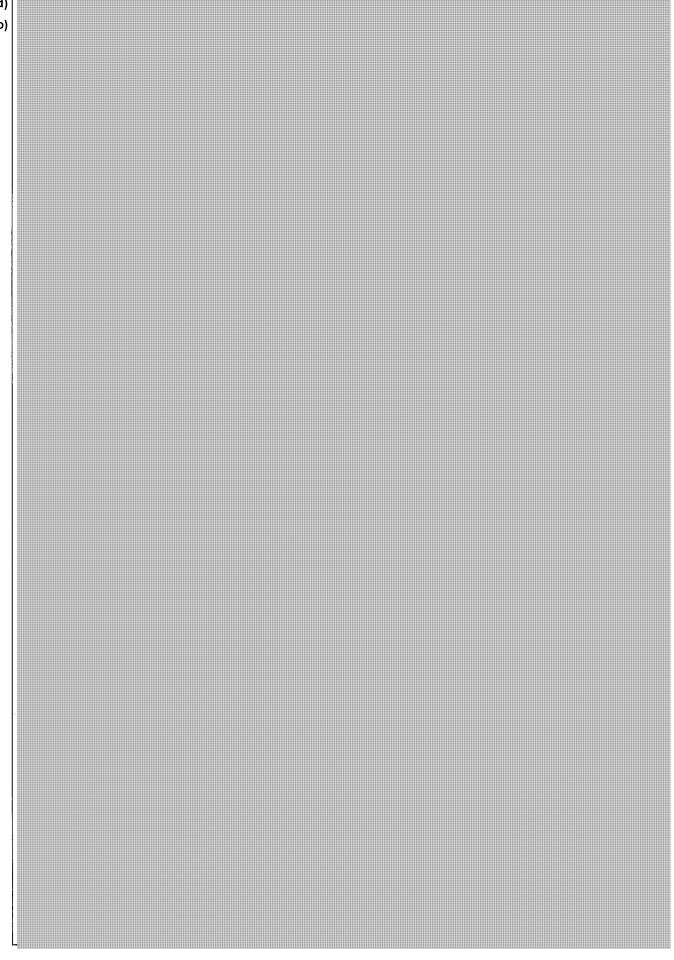
Page 10 of 16

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Finding ID:	771831	Process:	2(i)
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Page 13 of 16

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)



Page 14 of 16

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Regulatory Requirement; A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them; and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:	Finding ID:	771875	Process:	2 (d)	
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s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Audit Report

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Details are provided in the Findings section of this report.

Detailed descriptions of those findings are provided in the Findings section of this report.

s.20(1)(c)s.20(1)(d)

s.21(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to the above mentioned requirements, the following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities;
- 2(d) Compliance with applicable regulations, rules, standards and orders;
- 2(e) Risk management process:
- 2(h) Skills, training and supervision, and;
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

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A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation.

s.20(1)(b) s.20(1)(c)

s.20(1)(d)

Audit Scope

s.21(1)(b)

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O ₁	ther Issues			

s.20(1)(c)

s.20(1)(d) s.21(1)(b)

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

	Finding ID:	771571	Process:	2(d)	
	Regulatory Requ	airement:			
follo 2(d) (i) rand; (ii)	owing component systems for ident ailway safety regu	: tifying applicable: alations, rules, standa	ards and orders, and th	ne procedures for dem	noncludes, at a minimum, the nonstrating compliance with them, onditions specified in the notice of
	Railway Commi	itment:		100 - 100 -	The state of the s
•	Work/rest rules t	for railway operating	g employees, TC O 0-1	40, February 2011	
	Description of F	inding:			
	Supporting Deta	nils:	The State of the S		Here and the second of the sec

Finding ID:	771601	Process:	2(d)
Regulatory Requ	uirement:		
A railway company strong following component 2(d) systems for identifications:	:	d maintain a safety manag	gement system that includes, at a minimum, the
(i) railway safety regulatem, and;	ılations, rules, star		e procedures for demonstrating compliance with
(ii) exemptions and the of exemption;	ne procedures for o	demonstrating compliance	e with the terms or conditions specified in the no
Railway commi	tment:		
Work/rest rules for ra	ilway operating e	mployees, TC O 0-140, Fe	ebruary 2011,
Description of F	inding:	第二章 東部 東部	AND
Supporting Deta	ils -		
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Finding ID:	771765	Process:	2(b)
Regulatory Req	quirement:		
ollowing componen	t:		ement system that includes, at a minimular at all levels in the railway company
Railway Comm	nitment:	Section 1	
General Fatigue Mar Employees (Novemb	nagement Plan for Oper 2011),	Canadian Pacific and the T	Feamsters Canada Rail Conference Oper
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Finding ID:	771781	Process:	2(h)
Regulatory Re	quirement:		
		nd maintain a safety manag	gement system that includes, at a minim
following componer		nlovees and any other ners	sons to whom the railway company gra
its property, has safety requirer	ave appropriate skil	lls and training and adequa	te supervision to ensure that they comp
Railway Comr	nitment:		
General Fatigue Ma Employees (Novem	nagement Plan for ber 2011),	Canadian Pacific and the	Teamsters Canada Rail Conference Ope
Description of	Finding:	75 (75 (75 (75 (75 (75 (75 (75 (75 (75 (
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s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.20(1)(d)					
s.21(1)(b)	Finding ID:	771786	Process:	2(d)	
	Regulatory Regu	irement:			10 2 10 10 10 10 10 10 10 10 10 10 10 10 10

Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: ((d) systems for identifying applicable:) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with hem, and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011). Description of Finding: Supporting Details:					
Collowing component: 2(d) systems for identifying applicable: (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:	Regulatory Requiremen		TOTAL		
2(d) systems for identifying applicable: (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:	A railway company shall imp	lement and maintain a	safety management sys	tem that includes, at a min	imum, the
(i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:		nnlicable			
hem, and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:			rders, and the procedure	s for demonstrating compl	iance with
Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:	hem, and;				
General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:	(ii) exemptions and the proce of exemption.	dures for demonstratin	g compliance with the to	erms or conditions specifie	ed in the notice
Employees (November 2011), Description of Finding:			All Services Physics and the American	12 (1996) 1 (1996)	
	General Fatigue Managemen Employees (November 2011)	i Plan for Canadian Pa),	cific and the Teamsters	Canada Rail Conference O	perating
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	Supporting Details				

Page 10 of 15

s.20(1)(b) s.20(1)(c)s.20(1)(d)Finding ID: 771831 Process: 2(i) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(i) procedures for the collection and analysis of data for assessing the safety performance of the railway company. Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:

Page 13 of 15

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Finding ID	771875	Process:	2 (d)	
Regulatory	Requirement:	or and the second of the secon	English Control of the Control of th	
A railway compa	any shall implement ar	nd maintain a safety manag	ement system that in	cludes, at a minimum
ollowing compo	onent: identifying applicable			
· · •		andards and orders, and the	procedures for demo	onstrating compliance
ii) exemptions a of exemption.	and the procedures for	demonstrating compliance	with the terms or co	nditions specified in
Railway Co	ommitment:			
General Fatigue	Management Plan for	Canadian Pacific and the T	'eamsters Canada Ra	il Conference Operat
Employees (Nov				
Description	n of Finding:			
Supporting	Details:			
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Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP) and in light of Safety Management System Regulations (SMS), Transport Canada Work Rest Rules for Railway Operating Employees (WRR) and Fatigue Management Plans, Requirements and Assessment Guidelines" was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as required by the WRR, and as defined by CP and submitted to Transport Canada. This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the WRR as well as their implementation as defined by the Railway. This assessment was carried out through record reviews, observations and interviews with personnel.

Details are provided in the Findings section of this report.

Detail description of those findings is provided in the Findings section of this report.

Introduction

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team proceeded to review the records provided and interviewed selected members of CP management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Alyth facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR (February 2011).
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation.

Audit Scope

The scope of this audit was to verify the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies, processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

O	Ither	Issues				

s.20(1)(c)

s.20(1)(d) s.21(1)(b)

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process:	2(d)	
Regulatory Requ	nirement:			ng transport
following component 2(d) systems for ident (i) railway safety regu and	ifying applicable llations, rules, stand	ards and orders, and the	procedures for demor	ludes, at a minimum, the strating compliance with them, ditions specified in the notice of
Railway Commi	tment:			
- Work/rest rules f	or railway operating	gemployees, TC O 0-14	0, February 2011	
Description of F	inding:			
Supporting Deta	ils			

Finding ID:	771601	Process:	2(d)
Regulatory Requ	irement:		epaids
following component: 2(d) systems for identi (i) railway safety regul	ifying applicable		rement system that includes, at a minimum, to
them, and (ii) exemptions and the of exemption;	e procedures for	demonstrating compliance	with the terms or conditions specified in the
Railway commit	ment:		
Work/rest rules for rai	lway operating e	mployees, TC O 0-140, Fe	ebruary 2011,
Description of Fi	inding:	The same of the sa	
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Supporting Detail	ils:		

Finding ID:	771765	Process:	2(b)	
Regulatory Rec	quirement:			
following componen	t:		gement system that includes, at fety at all levels in the railway co	
Railway Comm	nitment:			
General Fatigue Mar Employees (Novemb	nagement Plan for Oper 2011),	Canadian Pacific and the	Teamsters Canada Rail Confere	nce Operation
Description of	Finding:	Ann Again Ann		
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1)(d)	Finding ID:	771781	Process:	2(h)	
)(b)	Regulatory Requ	uirement:	FALL FALL FOR	· · · · · · · · · · · · · · · · · · ·	Maria Ma Maria Maria Ma
A r foll	owing component 2(h) systems for its property, hav	; ensuring that em e appropriate skil	ployees and any other pers	ons to whom the ra	ilway company grants access to sure that they comply with all
denin The S	safety requireme Railway Commi	ents;			
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Gei Em	neral Fatigue Mana ployees (Novembe	agement Plan for er 2011),	Canadian Pacific and the T	eamsters Canada R	ail Conference Operating
6 141 41, 11	Description of F	inding;			
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s.20(1)(b) s.20(1)(c)Finding ID: 771786 Process: 2(d) s.20(1)(d) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:

Finding ID: 771831 Process: 2(i) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(i) procedures for the collection and analysis of data for assessing the safety performance of the railway component: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:					Record released pursuant to Document divulgué en vertu
A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(i) procedures for the collection and analysis of data for assessing the safety performance of the railway component: Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	Finding ID:	771831	Process:	2(i)	
following component: 2(i) procedures for the collection and analysis of data for assessing the safety performance of the railway component: Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	Regulatory Requireme	nt:			
General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	following component:				
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Page 13 of 15

s.20(1)(d) s.21(1)(b)

s.20(1)(b)

s.20(1)(c)

	771875	Process:	2 (d)		
Regulatory Re	equirement:				
following compone (2(d) systems for ide (i) railway safety re (them, and	nt: entifying applicable egulations, rules, star	d maintain a safety managed maintain a safety managed managed and orders, and the demonstrating compliance	e procedures for de	emonstrating compl	iance
of exemption; Railway Com					
		Canadian Pacific and the	Teamsters Canada	Rail Conference O	perati
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Supporting D	etails:				

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

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Details are provided in the Findings section of this report.

Detail description of those findings is provided in the Findings section of this report.

Introduction

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

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TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

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The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

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- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR (February 2011).
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
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- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation.

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)
- Following components of the Safety Management Systems Regulations were also applicable:
 - 2(b) Safety authorities, responsibilities and accountabilities
 - 2(d) Compliance with applicable regulations, rules, standards and orders
 - 2(e) Risk management process
 - 2(h) Skills, training and supervision
 - 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process:	2(d)
Regulatory Require	ment:	emp.	
following component: 2(d) systems for identify (i) railway safety regulat and	ing applicable ions, rules, stanc	dards and orders, and the	gement system that includes, at a minimum, the procedures for demonstrating compliance with them, with the terms or conditions specified in the notice of
Railway Commitme	ent:		
- Work/rest rules for	railway operatin	g employees, TC O 0-14	0, February 2011
Description of Find	ling:	Section 1995	
Supporting Details:			

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s.21(1)(l	b)
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Finding ID:	771601	Process:	2(d)
Regulatory Req	uirement:		
following component 2(d) systems for iden (i) railway safety reg them, and	:: tifying applicable ulations, rules, stand	dards and orders, and the	gement system that includes, at a minimum, the procedures for demonstrating compliance with with the terms or conditions specified in the notice
Railway comm	tment:		
Work/rest rules for ra	ailway operating em	ployees, TC O 0-140, Fe	ebruary 2011,
Description of l	Finding;		
Supporting Det	ails:		

s.20(1)(b) s.20(1)(c) Finding ID: 771765 2(b) s.20(1)(d) Process: s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:

Finding ID:	771781	Process:	2(h)	
Regulatory Requ	irement:		和	
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following component;	,			
2(h) systems for its property, have	ensuring that eme appropriate skil	ployees and any other per ils and training and adequa	sons to whom the rail ate supervision to ens	way company grants ure that they comply
safety requireme	ents;			
Railway Commi				
General Fatigue Mana Employees (November	agement Plan for er 2011).	Canadian Pacific and the	Teamsters Canada Ra	ail Conference Operat
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s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.20(1)(d) s.21(1)(b)	Finding ID:	771786	Process:	2(d)				
	Regulatory Requ	uirement:						
	A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice							
	of exemption; Railway Commitment:							
	General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011),							
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	Supporting Deta	iils:			A Marie Tree			

s.20(1)(c) s.20(1)(d) s.21(1)(b)

s.20(1)(b)

s.20(1)(b) s.20(1)(c)s.20(1)(d) Finding ID: 771831 Process: 2(i) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(i) procedures for the collection and analysis of data for assessing the safety performance of the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Page 13 of 15

s.20(1)(c) s.20(1)(d) s.21(1)(b)

s.20(1)(b)

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() () () () () () () () () ()	Regulatory Requirement:									
	A railway company shall implement and maintain a safety management system that includes, at a minimum, the									
	following component 2(d) systems for ident)							
	(i) railway safety regu			e procedures for demonstrating compliance with						
	them, and	ne procedures for	demonstrating compliance	e with the terms or conditions specified in the n						
	of exemption;	ic procedures for	demonstrating comprises							
	Railway Comm	itment:								
	General Fatigue Man	agement Plan for	Canadian Pacific and the	Teamsters Canada Rail Conference Operating						
	Employees (Novembo									
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s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

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This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the WRR as well as their implementation as defined by the Railway. This assessment was carried out through record reviews, observations and interviews with personnel.

Details are provided in the Findings section of this report.

Detail description of those findings is provided in the Findings section of this report.

Page 1 of 13

Comment [bh1]: This section was updated as per instructions from Blair.

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team proceeded to review the records provided and interviewed selected members of CP management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Agincourt facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR (February 2011).
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation.

Audit Scope

Page 2 of 13

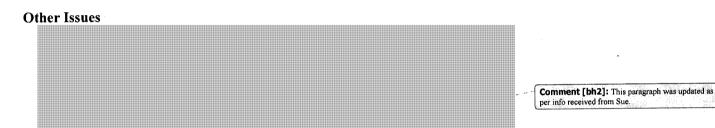
- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.



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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process	2(d)	· ·
Regulatory Requir	ement:			
A railway company sha following component:	ll implement and	maintain a safety mana	gement system that	includes, at a minimum, the
2(d) systems for identify	ying applicable	J J J J	a meanaduras for der	nonstrating compliance with them
and				nonstrating compliance with them,
(ii) exemptions and the exemption;	procedures for d	emonstrating compliance	e with the terms or o	conditions specified in the notice of
Railway Commitn	nent:	Tanggala di		
- Work/rest rules for	r railway operatir	ng employees, TC O 0-1	40, February 2011	
-				<u> </u>
Description of Fir	iding:		ners andre	
Supporting Detail	S :			

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771601	Process:	2(d)
Regulatory Requ	irement:		
following component: 2(d) systems for identi (i) railway safety regu them, and	fying applicable lations, rules, sta	e andards and orders, and the	gement system that includes, at a minimum, the procedures for demonstrating compliance with with the terms or conditions specified in the notice
Railway commit	ment:		Application of the second of t
Work/rest rules for rai	lway operating of	employees, TC O 0-140, F	ebruary 2011,
Description of F	nding:	To place 1	· · · · · · · · · · · · · · · · · · ·
a de la companya de			- 12-00000000000000000000000000000000000
Supporting Deta	ile		
Supporting Dem	- mi		

Process:

2(b)

Page 5 of 13

771765

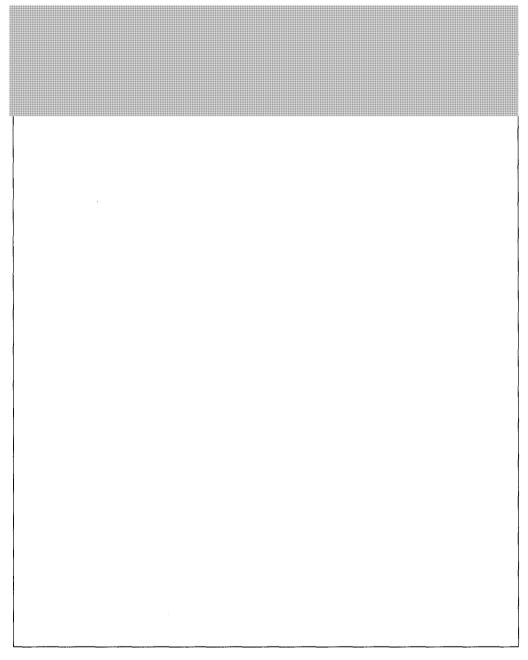
Finding ID:

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company							
Railway Commitment:	in the state of th		Thaile				
General Fatigue Management Plan for Canadian P Employees (November 2011),	acific and the T	eamsters Canada I	Rail Conference O	perating			
Description of Finding:			Table Capter and				
Supporting Details:							
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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



Finding ID:	771781	Process:	2(h)	
Regulatory Rec	quirement:			

Page 7 of 13

- s.20(1)(b) s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

A railway company shall implement and maintain a safety management system that includes, at a minimum, th	e
following component;	

2(h) systems for ensuring that employees and any other persons to whom the railway company grants access to its property, have appropriate skills and training and adequate supervision to ensure that they comply with all safety requirements;

Railway Commitment:

General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011).

Description of Finding:

Supporting Details:

Finding ID:	771786	Process:	2(d)	
Regulatory Rec	quirement:	東門町(n		

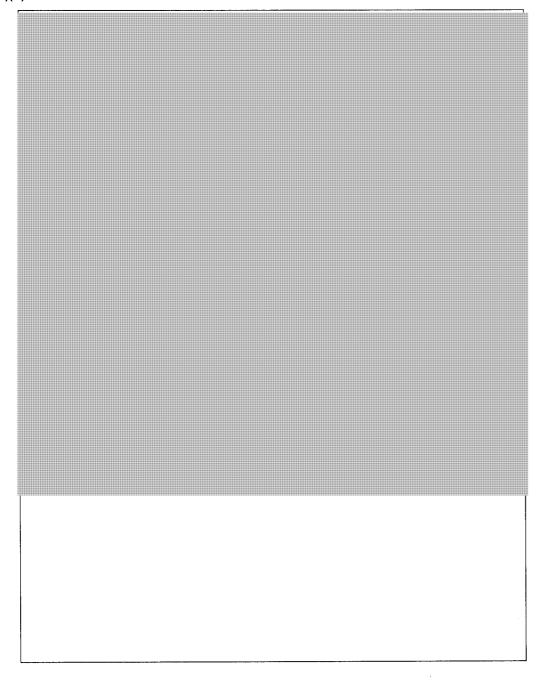
Page 8 of 13

- s.20(1)(b) s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

A railway company shall implement and maintain a safety management system that includes, at a minimum, the	
following component:	
2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with	
them, and	
(ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption;	
Railway Commitment:	
General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011),	
Description of Finding:	
Supporting Details:	
	Comment [bh3]:

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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



Finding ID:	771831	Process:	2(i)	
		Proceedings of the con-	` '	1

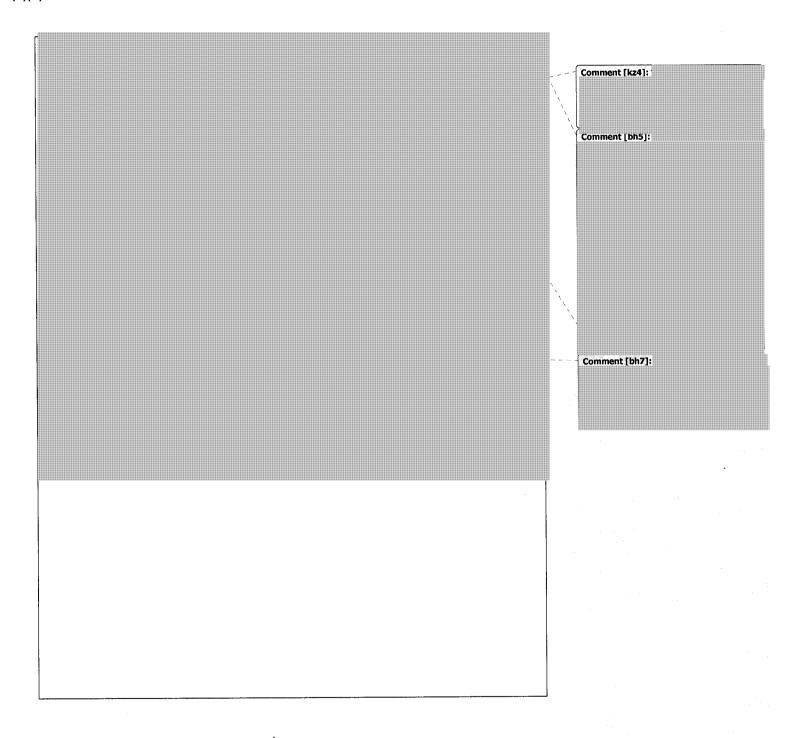
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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

A railway company shall implement following component: 2(i) procedures for the collection as				
Railway Commitment:			46	
General Fatigue Management Plan Employees (November 2011)	for Canadian Pacific an	nd the Teamsters	s Canada Rail Con	ference Operating
Description of Finding:	200 (100 (100 (100 (100 (100 (100 (100 (vardinas (m. 1213) 18. jaunus – Paris Laurens (m. 1214)		
Supporting Details:				

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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771875	Process:	2 (d)					
Regulatory Requi	rement:	1944). 1941). 1941).						
A railway company sha following component: 2(d) systems for identif (i) railway safety regulathem, and	ying applicable ations, rules, star	ndards and orders, and t	he procedures for	demonstrating co	ompliance with			
(ii) exemptions and the of exemption;	procedures for c	lemonstrating complian	ice with the terms	or conditions spe	erried in the notice			
Railway Commit	nent:							
General Fatigue Manag Employees (November	gement Plan for (2011)	Canadian Pacific and th	e Teamsters Canad	da Rail Conferenc	ce Operating			
Description of Fig.	nding:							
					h à	Comment [kz8]:		
Supporting Detai	ls:							
						Comment bh9]	i.	

s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP) and in light of Safety Management System Regulations (SMS), Transport Canada Work Rest Rules for Railway Operating Employees (WRR) and Fatigue Management Plans, Requirements and Assessment Guidelines" was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as required by the WRR, and as defined by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the WRR as well as their implementation as defined by the Railway. This assessment was carried out through record reviews, observations and interviews with personnel.

Details are provided in the Findings section of this report.

Detail description of those findings is provided in the Findings section of this report.

s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team proceeded to review the records provided and interviewed selected members of CP management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Agincourt facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR (February 2011).
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation.

s.20(1)(d) s.21(1)(b)

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues			

s.20(1)(d)

s.21(1)(b)

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process:	2(d)	
Regulatory Req	uirement:			The state of the s
following component 2(d) systems for iden (i) railway safety regard	:: tifying applicable ulations, rules, stand	ards and orders, and t	he procedures for demo	constrating compliance with them,
Railway Comm	itment:			
- Work/rest rules	for railway operating	g employees, TC O 0-	140, February 2011	
Description of I	inding:			
Supporting Det	ails:			

s.20(1)(d)

s.21(1)(b)

Finding ID:	771601	Process:	2(d)	
Regulatory Re	quirement:	The second secon		
following componer 2(d) systems for idea (i) railway safety reg them, and	nt: ntifying applicable gulations, rules, stand	lards and orders, and the	gement system that includes, at a minimum, the e procedures for demonstrating compliance with e with the terms or conditions specified in the notice	
Railway comm	nitment:			Pearly Parly Line
Work/rest rules for	railway operating em	ployees, TC O 0-140, F	ebruary 2011,	
Description of	Finding:		CONTRACTOR OF THE CONTRACTOR O	
Supporting De	etails:	- 1946 - 1946 - 1947 - 1948		

s.20(1)(d)

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Finding ID: 771765 Process: 2(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:

s.20(1)(d)			
s.21(1)(b)			
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	,		

s.20(1)(c)

s.20(1)(d)

- 4		
s.21	(1)(b)

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Regulatory Requ	irement:			
following component; 2(h) systems for	ensuring that em	ployees and any other per	gement system that includes, at a minimum, the sons to whom the railway company grants access	s to
its property, have safety requirement	e appropriate skil	ls and training and adequa	ite supervision to ensure that they comply with a	11
Railway Commit	ment:			
General Fatigue Mana Employees (Novembe	gement Plan for r 2011),	Canadian Pacific and the	Teamsters Canada Rail Conference Operating	
Description of Fi	nding:			
Supporting Deta	ile.			
Supporting Deta	134	A STATE OF THE STA		

Finding ID:	771786	Process:	2(d)	

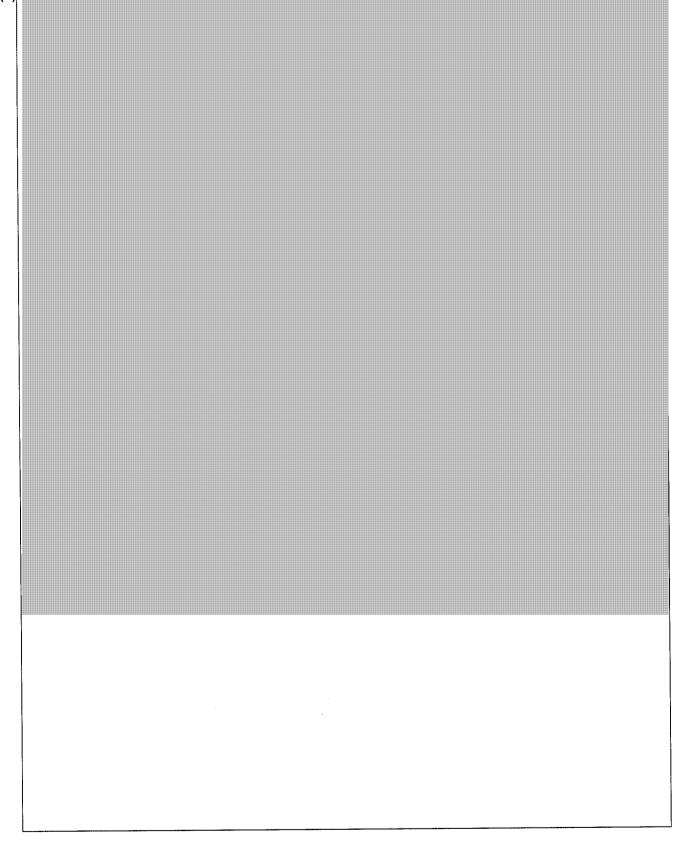
following component: 2(d) systems for identifying appl (i) railway safety regulations, rul them, and	les, standards and orders, and the procedures for demonstrating compliance v
(ii) exemptions and the procedur of exemption;	es for demonstrating compliance with the terms or conditions specified in the
Railway Commitment:	
General Fatigue Management Pl Employees (November 2011),	an for Canadian Pacific and the Teamsters Canada Rail Conference Operation
Description of Finding:	
C. Postine Dataile	
Supporting Details:	

s.20(1)(c)

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)



s.20(1)(d)

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Finding ID: 771831 Process: 2(i) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(i) procedures for the collection and analysis of data for assessing the safety performance of the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)			

Finding ID:	771875	Process:	2 (d)	
Regulatory Requ	irement:			4
A railway company sh following component:	_	ınd maintain a safety mana	gement system that includes, at a minimum, the	
2(d) systems for ident		e		
them, and			e procedures for demonstrating compliance with	
(ii) exemptions and th of exemption;	e procedures for	r demonstrating complianc	e with the terms or conditions specified in the notice	•

s.20(1)(d) s.21(1)(b)

Railway Commitment:
General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011)
Description of Finding:
Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

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Details are provided in the Findings section of this report.

Detail description of those findings is provided in the Findings section or this report.

s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

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- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR (February 2011).
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation.

s.20(1)(d) s.21(1)(b)

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

0	ther Issues				

s.20(1)(d) s.21(1)(b)

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process:	2(d)				
Regulatory Require	ement:						
A railway company shall following component:	l implement and	maintain a safety manag	gement system that includes, at a minimum, the				
2(d) systems for identify	ing applicable						
and			e procedures for demonstrating compliance with them,				
(ii) exemptions and the pexemption;	procedures for de	emonstrating compliance	e with the terms or conditions specified in the notice of				
Railway Commitm	ent:						
- Work/rest rules for	- Work/rest rules for railway operating employees, TC O 0-140, February 2011						
-							
Description of Find	ling;						
Supporting Details			4. 从之主告,有事是为张				

s.20(1)(b)	
s.20(1)(c)	
s.20(1)(d)	
s.21(1)(b)	

Finding ID:	771601	Process:	2(d)
Regulatory Req	uirement:		
following componen 2(d) systems for ider (i) railway safety reg them, and	t: atifying applicable ulations, rules, star	ndards and orders, and the	gement system that includes, at a minimum, the e procedures for demonstrating compliance with e with the terms or conditions specified in the notice
Railway comm	itment:	部 ・選及: 4 200g - 200g	
Work/rest rules for r	ailway operating e	mployees, TC O 0-140, F	ebruary 2011,
Description of	Finding:		
Supporting De	tails:		

s.20(1)(b) s.20(1)(c)

s.20(1)(d)

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Finding ID:	771765	Process:	2(b)		
Regulatory Requ	irement:	Part of the second			
ollowing component:		and maintain a safety manag			
Railway Commit	tment;			14 Aug.	
General Fatigue Mana Employees (Novembe	igement Plan fo er 2011),	r Canadian Pacific and the	Feamsters Canada	Rail Conferenc	e Operating
Description of F	inding:				
Supporting Deta	ils:				
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s.20(1)(d) s.21(1)(b)

Page 7 of 13

(b) Finding ID:	771781	Process:	2(h)
Regulatory Rec	quirement:	· · · · · · · · · · · · · · · · · · ·	
following component	it; or ensuring that em ve appropriate skil	ployees and any other per	gement system that includes, at a minimum, the sons to whom the railway company grants access ate supervision to ensure that they comply with all
Railway Comn	nitment:		
General Fatigue Ma Employees (Novemb	nagement Plan for ber 2011),	Canadian Pacific and the	Teamsters Canada Rail Conference Operating
Description of	Finding:	142 Maria 142	
	Y. C.		Part State of the Control of the Con
Supporting De	tails:		

Finding ID:	771786	Process:	2(d)
Regulatory Requ	irement:	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
following component: 2(d) systems for ident (i) railway safety regulathem, and	ifying applicable	ndards and orders, and the	gement system that includes, at a minimum, to procedures for demonstrating compliance we with the terms or conditions specified in the
Railway Commi	tment:		
General Fatigue Mana Employees (November	agement Plan for er 2011),	Canadian Pacific and the	Feamsters Canada Rail Conference Operatin
Description of F			
Supporting Deta	ils:		
Supporting Deta	iils:		
Supporting Deta	iils:		
Supporting Deta	iils:		
Supporting Deta	ils:		
Supporting Deta	uils:		

s.20(1)(c) s.20(1)(d) s.21(1)(b)

s.20(1)(b) s.20(1)(c)

s.20(1)(d) s.21(1)(b)

Finding ID:	771831	Process:	2(i)
Regulatory Requirem	ent:		
following component:			nanagement system that includes, at a minimum, the sessing the safety performance of the railway company
Railway Commitmen			
General Fatigue Managem Employees (November 20)	ent Plan for Can	adian Pacific and	the Teamsters Canada Rail Conference Operating
Description of Findin	g:		
Supporting Details:			

s.20(1)(d) s.21(1)(b)

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s.20(1)(b) s.20(1)(c) s.20(1)(d)

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s.21	(1)(b)

Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:	Finding ID:	771875	Process:	2 (d)	
following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	Regulatory Requ	irement:			
(i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	A railway company sh following component:	all implement and	maintain a safety manag	gement system that i	ncludes, at a minimum, the
them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:					
of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	them, and				
General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:		e procedures for d	emonstrating compliance	e with the terms or c	onditions specified in the notice
Employees (November 2011) Description of Finding:	Railway Commi	tment:		14 14 14 14 14 14 14 14 14 14 14 14 14 1	
	General Fatigue Mana Employees (Novembe	ngement Plan for C er 2011)	Canadian Pacific and the	Teamsters Canada R	ail Conference Operating
Supporting Details:	Description of F	inding!			
Supporting Details:					
	Supporting Deta	ils: end	Acting the second secon		

Comment [BR1]:

Comment [bh2]:

s.20(1)(b)

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP) and in light of Safety Management System Regulations (SMS) was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as defined by CP and submitted to Transport Canada.

The following provides an overview of the findings

Comment [bh3]:

Comment [bh4]:

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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



Comment [BR6]:

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

Page 2 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team proceeded to review the records provided and interviewed selected members of CP management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Agineourt Alyth facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR.
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation.

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
 - 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)
 - All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Page 3 of 14

Comment [BR7]: This should be Alyth or Ogden?

Comment [bh8]:

Comment [BR9]:

- s.20(1)(b) s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

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Oth	er	ISSU	es

Other issues to be reported here, if any

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Regulatory Requirement:

A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component:

2(d) systems for identifying applicable
(i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and
(ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption;

Railway Commitment:

Work/rest rules for railway operating employees, TC O 0-140, February 2011

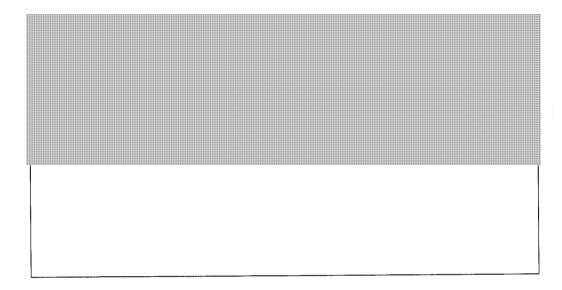
Description of Finding

Supporting Details:

Comment [bh10]: I've already amended this seviton and added the following text:

Comment [bh11]: These forms are as per RSIG, therefore templates.

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771601	Process:	2(d)
Regulatory Requ	uirement:		
following component:		maintain a safety mana	gement system that includes, at a minimum, the
them, and	ılations, rules, stand		e procedures for demonstrating compliance with
(ii) exemptions and the of exemption;	ne procedures for de	monstrating complianc	e with the terms or conditions specified in the notice
Railway commit	tment:	A Linguist Marie M	A Company of the Comp
Work/rest rules for ra	ilway operating em	ployees, TC O 0-140, F	ebruary 2011,
Description of F	inding:		
Supporting Deta	ails		

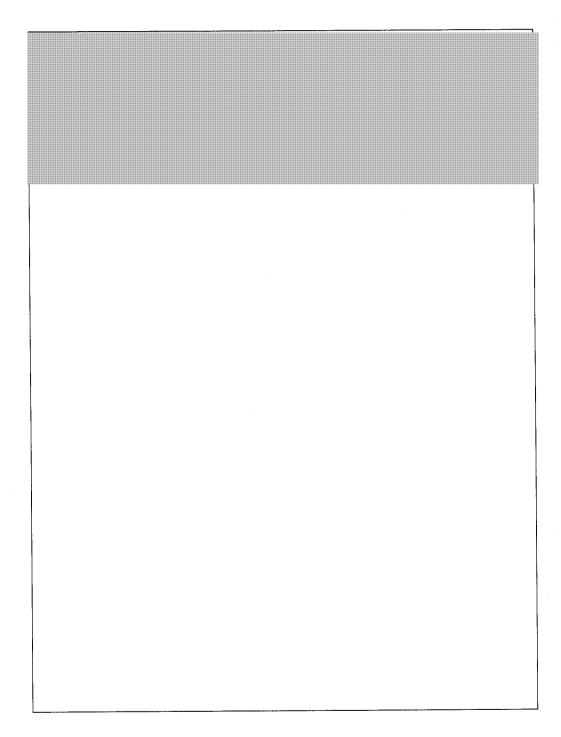
Page 6 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID;	771765	Process	2(b)
Regulatory Requ	irement _{ia}		
following component:			gement system that includes, at a minimum, the
Railway Commit	ment:		
General Fatigue Mana Employees (Novembe	gement Plan for r 2011),	Canadian Pacific and the	Teamsters Canada Rail Conference Operating
Description of Fi	nding	11/25	
Supporting Deta	ils:	Territorio de la composición dela composición de la composición de la composición dela composición dela composición dela composición dela composición de la composición de la composición dela composición	
	Talena Allana		

Page 7 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771781	Process	Training
Regulatory Requ	irement:		
following component;			gement system that includes, at a minimum, the
its property, have safety requireme	appropriate skil	ployees and any other per-	sons to whom the railway company grants access to ste supervision to ensure that they comply with all
Railway Commit	ment:		
General Fatigue Mana Employees (Novembe	gement Plan for r 2011),	Canadian Pacific and the	Teamsters Canada Rail Conference Operating
Description of F	nding:		
Supporting Deta	ils:		

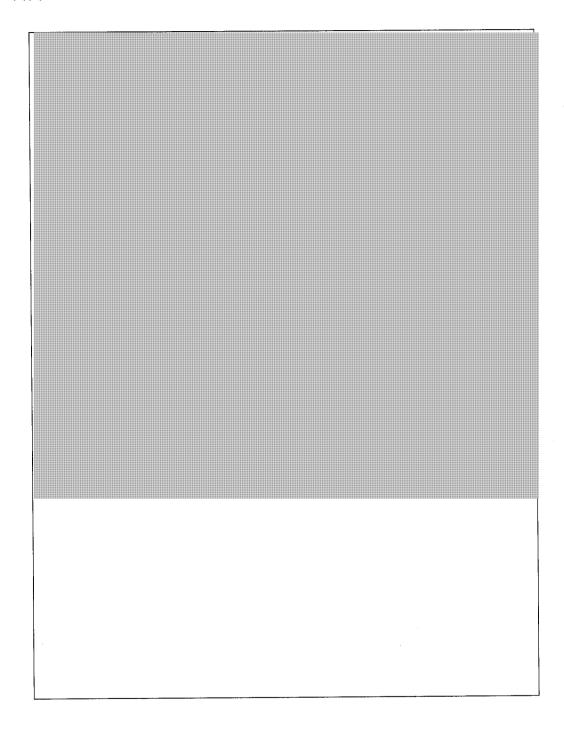
Page 9 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771786	Process:	2(d)	
Regulatory Requ	urement:			
following component: 2(d) systems for ident (i) railway safety regulatem, and	: ifying applicable ilations, rules, sta	e andards and orders, and the	procedures for demonstrating compliance v	vith
Railway Commi	tment:			
General Fatigue Mana Employees (November		Canadian Pacific and the	eamsters Canada Rail Conference Operatin	ıg
Description of F				
	opinient.	To Particular		
Supporting Deta	ails:			
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Page 10 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



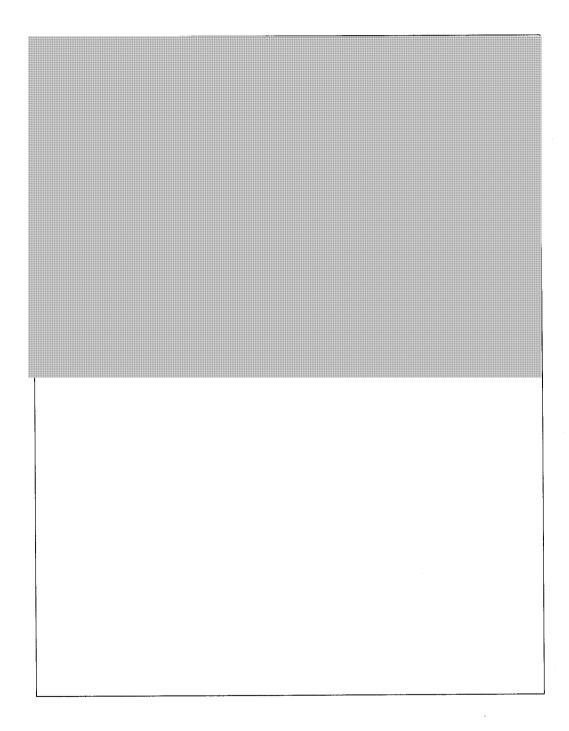
Page 11 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771831	Process:	2(i)		
Regulatory Requireme	entada	and a second	The leaf of the same		
A railway company shall in following component: 2(i) procedures for the colle					
Railway Commitment	i i sa terrorinas Santr				
General Fatigue Managemo Employees (November 201	ent Plan for Cana 1)	dian Pacific and	the Teamsters C	anada Rail Confere	ence Operating
Description of Findin	g.				
Supporting Details:					

Page 12 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



Page 13 of 14

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771875	Process	2 (d)	
Regulatory Requ	irement.			
A railway company sh following component:	all implement and	l maintain a safety manag	ement system that inle	cudes, at a minimum, the
2(d) systems for identi	fying applicable			
them, and				strating compliance with
(ii) exemptions and the of exemption;	e procedures for d	emonstrating compliance	with the terms or con	ditions specified in the notice
Railway Commit	ment.			
General Fatigue Mana Employees (Novembe	gement Plan for C r 2011)	Canadian Pacific and the	Teamsters Canada Rai	! Conference Operating
Description of F	inding			
Supporting Deta	ils:			

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

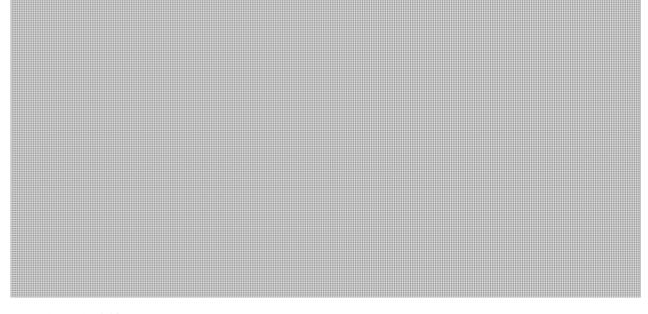
Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP) and in light of Safety Management System Regulations (SMS) and Transport Canada Work Rest Rules for Railway Operating Employees was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as defined by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the Work Rest Rules (WRR) as well as their implementation as defined by the Railway. This assessment was carried out through record reviews and interviews with personnel.

All these are reported as findings in this report.

The following provides an overview of the findings. Each one requires a corrective action:



s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team proceeded to review the records provided and interviewed selected members of CP

Page 2 of 13

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Agincourt facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
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- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. CPR will be responsible for submitting evidence of implementation of planned corrective actions per the timelines outlined in their corrective action plan. TC must be notified of any changes to the corrective action plan.

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues

Page 3 of 13

s.20(1)(c)

s.20(1)(d)

s.21(1)(b) Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process:	2(d)	
Regulatory Require	ment:	of organic	Principle Address on the State of State	196 Edil
following component: 2(d) systems for identify (i) railway safety regulat and	ing applicable ions, rules, stand	dards and orders, and t	nagement system that includes, at a minimum, the the procedures for demonstrating compliance with the notion with the terms or conditions specified in the notion.	
Railway Commitm				\$116.7 1
- Work/rest rules for	railway operatin	g employees, TC O 0-	-140, February 2011	
Description of Find	ling:			19
Supporting Details				Parket Service

s.20(1)(b) s.20(1)(c) s.20(1)(d)

Finding ID:	771601	Process:	2(d)	
Regulatory Requ	iirement:			
A railway company sh following component:	nall implement a	nd maintain a safety man	nagement system that includes, at a mining	num
2(d) systems for ident		;		
(i) railway safety regu			he procedures for demonstrating complia	ance
them, and	, ,	1 Company	ith the terms of an ditions specified	انسا
(ii) exemptions and th of exemption;	e procedures for	demonstrating complian	ace with the terms or conditions specified	1 111
Railway commit	ment:			
Andrew State (1997)	Frida (g)	tribe a la la company	· · · · · · · · · · · · · · · · · · ·	
Work/rest rules for ra	ilway operating o	employees, TC O 0-140,	February 2011,	
Description of F	inding:			
				\$278
Supporting Deta	ills: "Facility of the second			
Supporting Deta	ills:			
Supporting Deta	iils:			
Supporting Deta	iils:			
Supporting Deta	ils: Allega Allega		-150.00 (20) (20) (20) (20) (20) (20) (20) (2	
Supporting Deta	nils:			
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Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimuloillowing component: (b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating (November 2011), Description of Finding: Supporting Details:	Finding ID:	771765	Process	2(b)
Collowing component: 2(b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Opera Employees (November 2011), Description of Finding:	Regulatory Requ	irement:		
General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Opera Employees (November 2011), Description of Finding:	following component:			
Description of Finding:	Railway Commit	tment:		
Description of Finding:	General Fatigue Mana	agement Plan for	Canadian Pacific and the	e Teamsters Canada Rail Conference Opera
	Employees (Novembe	r 2011),		
Supporting Details:	Description of F	inding:	The second secon	
Supporting Details:				
Supporting Defans:				
	Supporting Deta	dist		
	不是智能的人。建设等现代的2000年,是 企 业发展。		elanith a sea agus	

s.20(1)(d) s.21(1)(b)

s.20(1)(d) s.21(1)(b) 771781 Process: 2(h) Finding ID: Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component; 2(h) systems for ensuring that employees and any other persons to whom the railway company grants access to its property, have appropriate skills and training and adequate supervision to ensure that they comply with all safety requirements; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:

s.20(1)(b)

s.20(1)(c)

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Regulatory Requirement; A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:	Finding ID:	771786	Process:	2(d)
following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:	Regulatory Requ	irement:		
them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:	following component: 2(d) systems for identification	fying applicable		
Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding:	them, and (ii) exemptions and the			
Employees (November 2011), Description of Finding:	THE THE TAXABLE PROPERTY OF TAXABLE PROPERTY O	ment:		
	General Fatigue Mana Employees (Novembe	gement Plan for r 2011),	Canadian Pacific and the	Feamsters Canada Rail Conference Operating
Supporting Details:	Description of Fi	nding:		
Supporting Details:				
Supporting Details:				
	Supporting Detail	ls:		

s.20(1)(d)	
s.21(1)(b)	

s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Finding ID:	771831	Process:	2(i)
Regulatory Require	ment:	PIDE TOUR	
following component:			management system that includes, at a minimum, the ssessing the safety performance of the railway company
Railway Commitme		Ti. 441.	
General Fatigue Manage Employees (November 2	ment Plan for Cana	dian Pacific an	d the Teamsters Canada Rail Conference Operating
Description of Find	ing:		
Supporting Details	A MARKET		

s.20(1)(d) s.21(1)(b)

Page 12 of 13

- s.20(1)(b) s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Finding ID:	771875	Process:	2 (d)	
Regulatory Requ	irement:	- 		
A railway company sh following component:	nall implement an	nd maintain a safety manag	gement system tha	t includes, at a minimum, the
2(d) systems for ident (i) railway safety regulathem, and			procedures for de	emonstrating compliance with
(ii) exemptions and th of exemption;	e procedures for	demonstrating compliance	with the terms or	conditions specified in the notice
Railway Commi	tment:	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1		之。 1000 年表表
General Fatigue Mana Employees (November	agement Plan for er 2011)	Canadian Pacific and the	Teamsters Canada	Rail Conference Operating
Description of F	inding:			
Supporting Deta	ils:			

s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

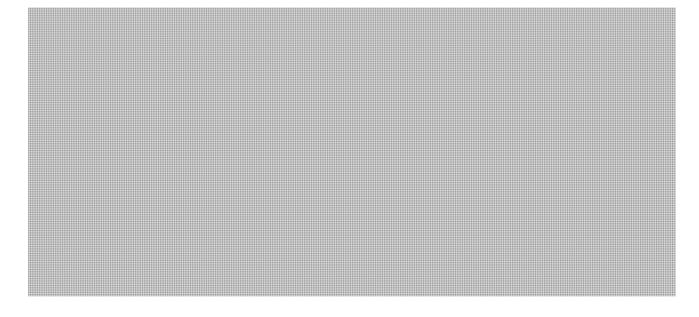
XXXXXXXXX, 2015

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The following provides an overview of the findings. Each one requires a corrective action:



s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

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Page 2 of 13

s.20(1)(c) s.20(1)(d)

s.21(1)(b)

management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Agincourt facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR.
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. CPR will be responsible for submitting evidence of implementation of planned corrective actions per the timelines outlined in their corrective action plan. TC must be notified of any changes to the corrective action plan.

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues

s.20(1)(c)

s.20(1)(d)

s.21(1)(b) Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process:	2(d)
Regulatory Require	ement:		The second secon
A railway company shal following component:	l implement and	maintain a safety manag	ement system that includes, at a minimum, the
2(d) systems for identify (i) railway safety regular		dards and orders, and the	procedures for demonstrating compliance with them,
and (ii) exemptions and the plexemption;	procedures for de	emonstrating compliance	with the terms or conditions specified in the notice of
Railway Commitm	ent;		
- Work/rest rules for	railway operatin	g employees, TC O 0-14	0, February 2011
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s.20(1)(b) s.20(1)(c) s.20(1)(d)

Finding ID:	771601	Process:	2(d)
Regulatory Requ	irement;		
following component: 2(d) systems for ident (i) railway safety regu them, and	ifying applicable lations, rules, star	ndards and orders, and the	gement system that includes, at a minimum, the procedures for demonstrating compliance with with the terms or conditions specified in the notice
Railway commit	ment:		
Work/rest rules for ra	ilway operating er	mployees, TC O 0-140, F	ebruary 2011,
Description of F	inding:		
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Regulatory Requirement: railway company shall implement and maintain a safety management system that includes, at a minim lowing component: o) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: neral Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Openployees (November 2011), Description of Finding:	Finding ID:	771765	Process:	2(b)
lowing component: b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: meral Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Openployees (November 2011),	Regulatory Re	equirement:	PROPERTY AND ADMINISTRATION OF STREET	
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s.21(1)(b)				
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1)(b)	Finding ID:	771781	Process:	Training	
	Regulatory Re	equirement:			
	following compone 2(h) systems to	ent; for ensuring that em ave appropriate skil	iployees and any other pe	agement system that includes, at a minimum, the ersons to whom the railway company grants access to uate supervision to ensure that they comply with all	0
	Railway Com	mitment:	1.20 2.20 2.20 2.20 2.20 2.20	19 2 20 40 5 10 10 10 10 10 10 10 10 10 10 10 10 10	
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Finding ID:	771831	Process:	2(i)		
Regulatory Requiren	nent:				
A railway company shall is following component: 2(i) procedures for the col	_				
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Regulatory Requirement: A railway company shall implement and maintain a safety management system that inleudes, at a minimum, the following component: (d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with the terms or conditions specified in the of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:		771875	Process:	2 (d)
following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance withem, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the of exemption; Railway Commitment; General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	Regulatory Requ	irement:		
(i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	A railway company sh following component:	nall implement a	nd maintain a safety man	agement system that inleudes, at a minimum, the
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s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

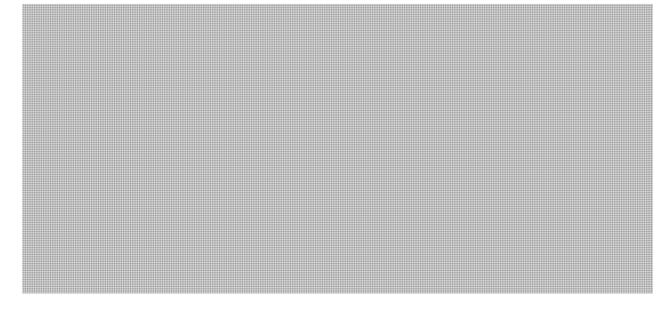
XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP) and in light of Safety Management System Regulations (SMS) was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as defined by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the WRR as well as their implementation as defined by the Railway. This assessment was carried out through record reviews and interviews with personnel.

The following provides an overview of the findings. Each one requires a corrective action:



s.20(1)(c) s.20(1)(d)

s.21(1)(b)

s.20(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team proceeded to review the records provided and interviewed selected members of CP

Page 2 of 14

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Agincourt facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR.
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. CPR will be responsible for submitting evidence of implementation of planned corrective actions per the timelines outlined in their corrective action plan. TC must be notified of any changes to the corrective action plan.

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
 - 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)
 - All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues

Other issues to be reported here, if any.

Audit Findings

Page 3 of 14

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process	2(d)	
Regulatory Requi	rement:			
A railway company sha following component:	all implement and r	maintain a safety mana	gement system that incl	udes, at a minimum, the
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s.20(1)(d) s.21(1)(b)

Finding ID:	771601	Process:	2(d)	
Regulatory Requ	uirement:			
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s.20(1)(c)

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Finding ID:	771781	Process:	Training
Regulatory Req	uirement:		Fig. 1. The second seco
following component 2(h) systems for	; ensuring that emp e appropriate skills	loyees and any other p	ersons to whom the railway company grants access to uate supervision to ensure that they comply with all
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General Fatigue Mana Employees (November	agement Plan for Cer 2011),	anadian Pacific and th	e Teamsters Canada Rail Conference Operating
Description of F	inding:		
Supporting Deta	ils:		

s.20(1)(d)

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Finding ID:	771786	Process:	2(d)	
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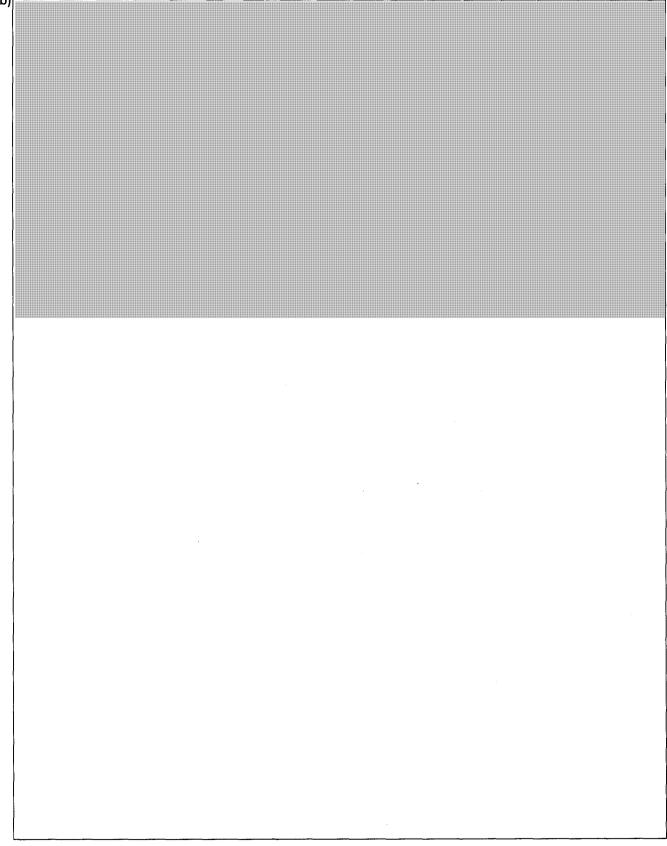
s.20(1)(d)

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Finding ID:	771831	Process:	2(i)	į
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s.20(1)(d)

Regulatory Requirement: A railway company shall implement and maintain a safety management system that inloudes, at a minimum, following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance vithem, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operatine Employees (November 2011) Description of Finding: Supporting Details:	STATE OF THE PROPERTY OF THE STATE OF THE ST	771875	Process:	2 (d)
following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance without them, and (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the of exemption; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding:	Regulatory Requ	irement:		
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	Description of F	inding:		
			Part Taken Parties	

s.20(1)(c)

s.20(1)(d)

s.21(1)Boan, Susan

s.21(1)(b) From:

Hart, Beata

Sent:

Wednesday, April 29, 2015 11:13 AM

To:

Boan, Susan

Subject:

RE: ARC CP audit review

Great! Thanks! ☺

From: Boan, Susan

Sent: Wednesday, April 29, 2015 2:06 PM

To: Hart, Beata

Subject: RE: ARC CP audit review

Ok good, I am ok with that. Thanks!

From: Hart, Beata

Sent: Wednesday, April 29, 2015 10:59 AM

To: Boan, Susan; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon; Nadon, Christine

Subject: RE: ARC CP audit review

Thanks so much Sue for taking the time to review. Please find my comments below ③.

From: Boan, Susan

Sent: Wednesday, April 29, 2015 12:50 PM

To: Hart, Beata; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon; Nadon, Christine

Subject: RE: ARC CP audit review

My comments on a few of Mark's comments. He did have some good comments.

s.20(1)(c)

s.20(1)(d)

s.21(1)(a)

s.21(1)(b)

Sue

From: Hart, Beata

Sent: Wednesday, April 29, 2015 8:09 AM

To: Boan, Susan; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon; Nadon, Christine

Subject: FW: ARC CP audit review

FYI – comments from Mark Conrad. Excellent and not too many, which is great!

From: Conrad, Mark

Sent: Wednesday, April 29, 2015 10:58 AM

To: Hart, Beata; Lui, Rachel

Cc: Miller, Mark; Raitt, Blair; Lines, Stephanie

Subject: FW: ARC CP audit review

Hi; added my comments directly into Rachel's additions above.

Beata; Good audit work.

A couple of items I was concerned about and noted in the margin notes, but again, some important findings in this work.

Thanks

From: Lui, Rachel

Sent: Tuesday, April 28, 2015 8:17 AM **To:** Hart, Beata; Miller, Mark; Conrad, Mark

Cc: Raitt, Blair; Lines, Stephanie **Subject:** RE: ARC CP audit review

Good morning Beata, thank you for the opportunity to provide comments. Please find attached my comments for consideration. If you have any questions, please don't hesitate to let me know. Thanks again.

From: Hart, Beata

Sent: Friday, April 24, 2015 1:57 PM **To:** Miller, Mark; Conrad, Mark; Lui, Rachel

Cc: Raitt, Blair

Subject: ARC CP audit review

Hello,

I am contacting you as a member of the audit review committee for the CP Fatigue management national audit. The draft of the audit report is now ready for you input.

Audit procedure specifies a seven working days timeframe for this review, which would brings us to Monday, May 4th. Please let me know if this is not feasible and if additional time is needed. I will ensure to adjust the schedule accordingly and obtain the necessary approval.

Based on the comments received and their complexity, a meeting (conference call) might be required to address your concerns. This will be determined once all comments are received. If, after your review, you would like a meeting nonetheless, please let me know and I will ensure to arrange one.

Below, I included the excerpt from the audit procedure that outlines responsibilities of the review committee, I hope you'll find it helpful.

If you have any questions please do not hesitate to contact me. Best Regards, Beata

Audit Procedure

The ARC is responsible for the following:

Audit Review Committee (ARC)

- Reviews the audit details and provides comments as appropriate;
- Reviews the audit report and provides feedback regarding the following:
 - supporting evidence (in regards to the findings);
 - additional technical advice (when applicable);
 - format;
 - readability;
 - consistency; and
 - clarity in wording

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP), eonsidering against Safety Management System Regulations (SMS), Transport Canada Work Rest Rules (WRR) for Railway Operating Employees (WRR) and "Fatigue Management Plans, Requirements and Assessment Guidelines" was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue fatigue Management management Planplans, as required by the WRR, and as defined and submitted to Transport Canada by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of the railway company's FMP to ensure compliance to the WRR as well as verify their implementation as defined by the Railway. This assessment was carried out through record reviews, observations and interviews with personnel.

The initial audit notification and the documentation request were was sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team then proceeded to review the records provided and interviewed selected members of the CP¹ management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits were to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes the special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

A closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Alyth facility. Next steps were presented but, due to audit activities still being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

Page 1 of 15

Comment [rl1]: General comment – acronyms should be spelt out the first time they are used

Comment [rl2]:

Comment [rl3]:

Comment [r14]: For readability, suggest an extra line return between paragraphs

Comment [rl5]:

Comment [ri6]: Plural above

Comment [rl7]: General comment - Need to be consistent: CP or CPR

s.20(1)(c)

s.20(1)(d)

s.21(1)(a)

s.21(1)(b)

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest_Rest_Rules for Railway Operating Employees, as published by the Railway Association of Canada (RAC) and provided by CPR (February 2011);
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003);
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003);
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003), and;
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

Eleven findings were reported as a consequence of this audit. Findings 771571 and 771601 were identified as

Details are provided in the Findings section of this report.

Detailed descriptions of those findings are provided in the Findings section of this report.

The Railway is encouraged to demonstrate how they intend to enhance railway safety by providing a corrective action plan to each of findings within 30 days of the issues of this audit report. The Corrective Action Plan should reference the Transport Canada audit findings and detail the Railway's proposed corrective actions to address them. Each corrective action should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. An example Corrective Action Plan template is attached to this report and it may be used.

Introduction

Pursuant to the Railway Safety Act, Transport Canada has conducted a systematic, detailed assessment of railway company policies, processes and procedures to (a) evaluate them against the documentation requirements of the RSMS Regulations; and (b) verify the implementation and effectiveness of said policies, processes and procedures.

Audit Scope

The scope of this audit was to verify the implementation of the Fatigue Management Plans as defined by CP, considering the requirements of "Work/rest-Rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

The following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities;
- 2(d) Compliance with applicable regulations, rules, standards and orders;
- 2(e) Risk management process;
- 2(h) Skills, training and supervision, and;
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

Page 2 of 15

Comment [mc8]:

Comment [rl9]:

Comment [rl10]: Perhaps this can be started on the next page to make more of a separation from the executive summary

Comment [rl11]: Spell out

Comment [rl12]:

Comment [mc13]: TC doesn't approve FMP's, They're the railway's internal plans.

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

The scope includes All-all records providing evidence of compliance with the above processes and all policies, processes, and procedures developed in support of fatigue management, dating back to from January 2010 to present.

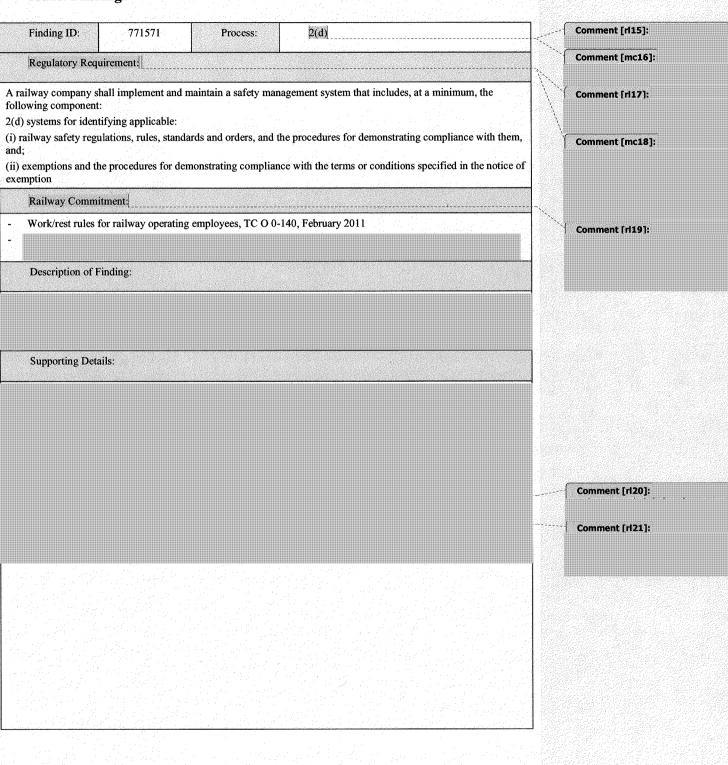
Other Issues

Comment [rl14]: Why?

Page 3 of 15

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(a)
- s.21(1)(b)

Audit Findings



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- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(a)
- s.21(1)(b)

Finding ID:	771601	Process:	2(d)				
Regulatory Re	quirement:						
following componer 2(d) systems for ide (i) railway safety re- them, and;	nt: ntifying applicable gulations, rules, stand	dards and orders, and t	he procedures for d	t includes, at a minimum, the emonstrating compliance with conditions specified in the no	tice		
Railway comn	nitment:						
Work/rest rules for	railway operating em	ployees, TC O 0-140,	February 2011				
Description of	Finding:						
Supporting De	tails:					{ Comment [rl22]:	
						Comment [rl23]:	

Page 5 of 15

s.20(1)(c)

s.20(1)(d)

s.21(1)(a)

Finding ID:	771765	Process:	2(b)	
Regulatory Req	uirement:			
ollowing componen	t:		nagement system that includes, at a minimum, the	
Railway Comm	itment:			
ieneral Fatigue Mar Imployees (Novemb	agement Plan for C er 2011),	Canadian Pacific and th	e Teamsters Canada Rail Conference Operating	Comment [rl241:
Description of	Finding:			
Supporting Det	ails:			
				Comment Fmc251:
				Comment [ri26]:
				Comment [rl27]: Comment [rl28]

- s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)
 - Comment [rl29]: Page 7 of 15

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(a)
- s.21(1)(b)

Finding ID:	771781	Process:	2(h)	
Regulatory Req	uirement:			
llowing component 2(h) systems for	; ensuring that empe appropriate skil	ployees and any other p	nagement system that includes, at a minimum, the persons to whom the railway company grants access to quate supervision to ensure that they comply with all	
Railway Comm				
eneral Fatigue Man nployees (Novemb	agement Plan for er 2011),	Canadian Pacific and th	ne Teamsters Canada Rail Conference Operating	
Description of I	rinding:			
				Comment [mc30]:
Supporting Det	ails:			
				Comment [rl31]: Missing a noun
				Comment [mc32]:
				Comment [mc33]: Concur with
				comments below Comment [rl34]:
				Comment [rl35]: Of what?
				Comment [rl36]: Define this
				Comment [mc37]:

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

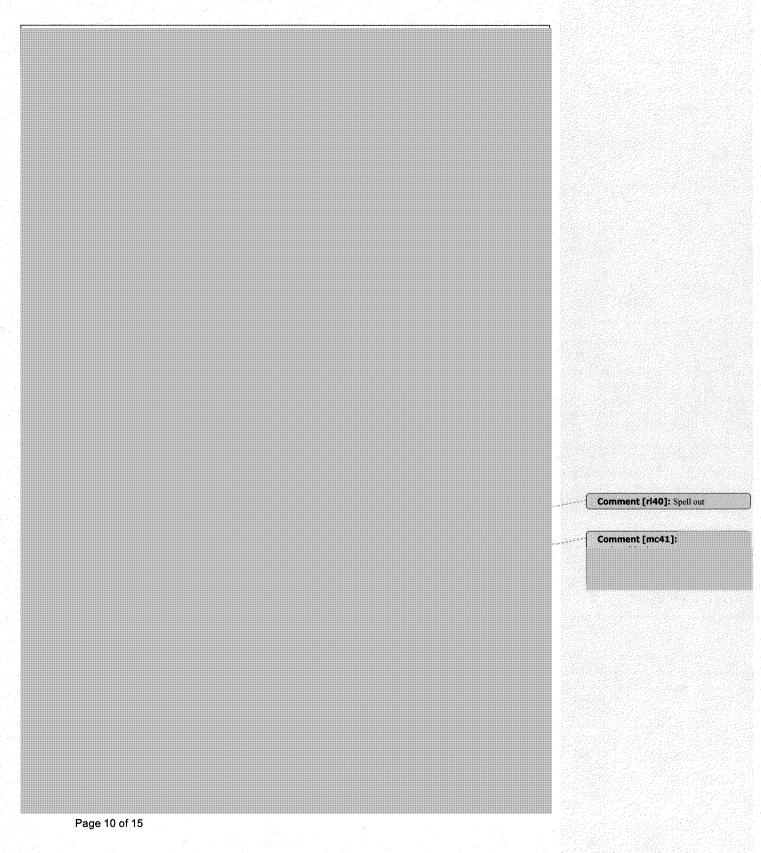
Finding ID:	771786	Process:	2(d)		
Regulatory Requ	nirement:				
ollowing component (d) systems for ident	ifying applicabl	e :	gement system that includes, at a		
ii) exemptions and the	e procedures fo	r demonstrating complianc	e with the terms or conditions spe	cified in the notice	Comment [mc38]: Overall comm
Railway Commi	tment:				on this section:
General Fatigue Mana Employees (Novembe	agement Plan fo	r Canadian Pacific and the	Teamsters Canada Rail Conference	ce Operating	
Description of F					
Supporting Deta	ile				
Dupporting Dea					
					Comment Library D. L. Collins
					Comment [ri39]: Perhaps this can made into one sentence
	_				
					그 아이는 그 그 중심한 이 중심 사람들은 아이가 그렇게 하는 사람들이 되었다. 그 사람들이 가장 사람들이 되었다.

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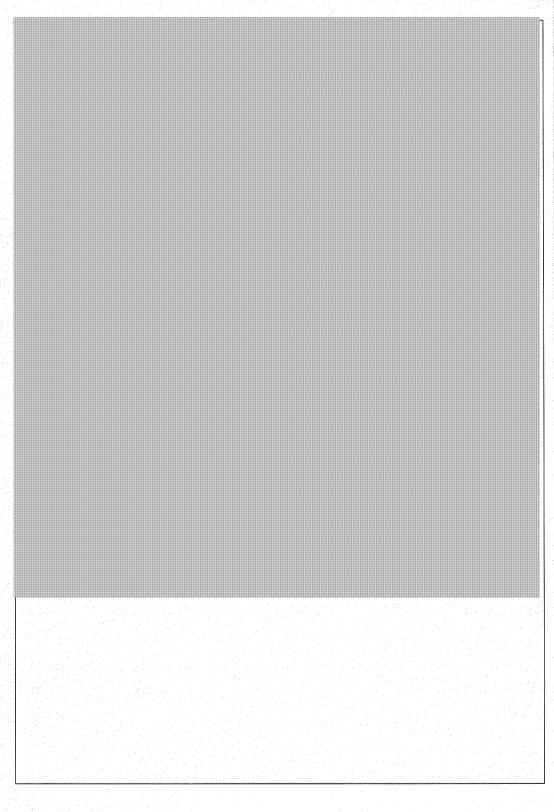
s.20(1)(c)

s.20(1)(d)

s.21(1)(a)



- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



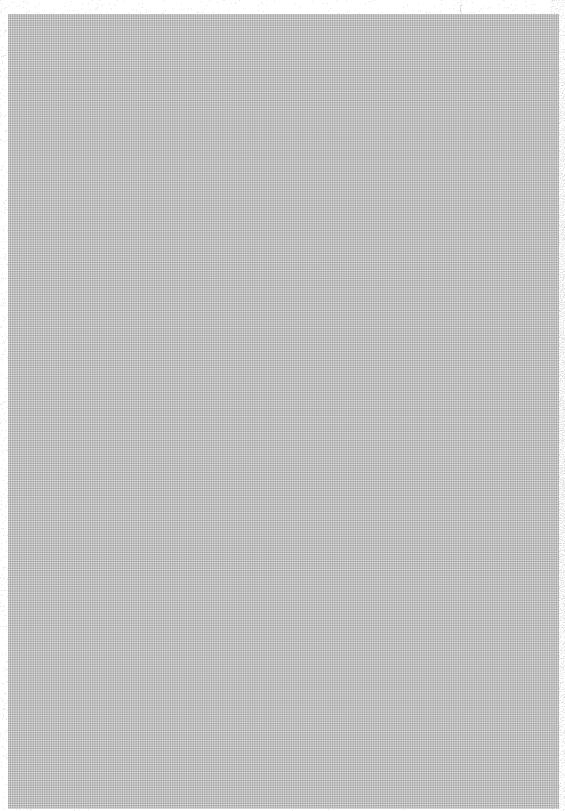
Page 11 of 15

s.20(1)(c)

s.20(1)(d)

Finding ID:	771831	Process:	2(i)		
Regulatory Require					
A railway company shal		maintain a safety ma	nagement system that incl	udes, at a minimum, the	
following component: 2(i) procedures for the co	ollection and anal	ysis of data for asse	ssing the safety performan	ce of the railway company.	
Railway Commitm	ent;				
General Fatigue Manage Employees (November 2	ment Plan for Car 011)	nadian Pacific and t	he Teamsters Canada Rail	Conference Operating	
Description of Fine	ing:				
					Comment [rl42]: Spell out
Supporting Details					ſ
					Comment [mc43]: Rule? Guide?
					Common process and contact
					Comment [rl44]: Define
					Comment [rl45]:
Page 12 of 1					

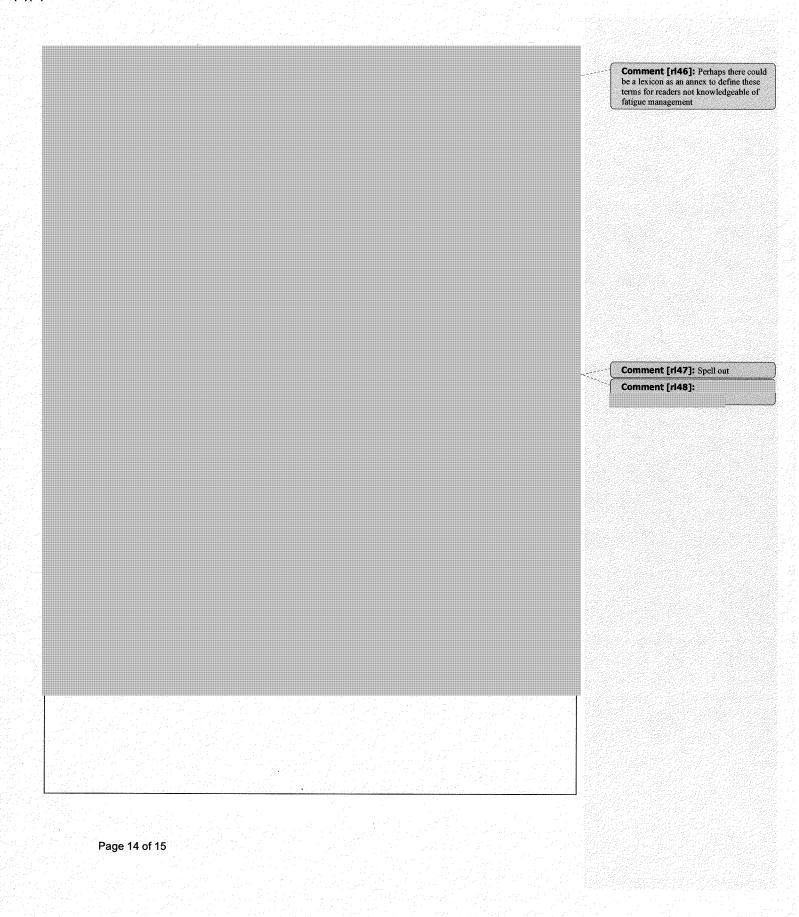
- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



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s.20(1)(c)

s.20(1)(d)



s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Finding ID:	771875	Process:	2 (d)	
Regulatory Requ	uirement:			
following component 2(d) systems for ident (i) railway safety regu them; and	: tifying applicable ılations, rules, stand	lards and orders, and t	agement system that includes, a	compliance with
of exemption.		monstrating complian	ce with the terms or conditions	pecified in the notice
Railway Commi	itment:	The Control of the Co		
General Fatigue Mana Employees (Novembo	agement Plan for Ca er 2011)	anadian Pacific and th	e Teamsters Canada Rail Confer	ence Operating
Description of F	inding:		9 1 dd	
Supporting Deta	iils:			
			,	

Page 15 of 15

s.21(1)(a) s.21(1)(b)

Boan, Susan

From:

Boan, Susan

Sent:

Wednesday, April 29, 2015 11:44 AM

To:

Hart. Beata

Subject:

RE: ARC CP audit review

For Rachel's comments:

Page $4 - 2^{nd}$ to last comments.

From: Hart, Beata

Sent: Wednesday, April 29, 2015 8:09 AM

To: Boan, Susan; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon; Nadon, Christine

Subject: FW: ARC CP audit review

FYI – comments from Mark Conrad. Excellent and not too many, which is great!

From: Conrad, Mark

Sent: Wednesday, April 29, 2015 10:58 AM

To: Hart, Beata; Lui, Rachel

Cc: Miller, Mark; Raitt, Blair; Lines, Stephanie

Subject: FW: ARC CP audit review

Hi; added my comments directly into Rachel's additions above.

Beata; Good audit work.

A couple of items I was concerned about and noted in the margin notes, but again, some important findings in this work.

Thanks

From: Lui, Rachel

Sent: Tuesday, April 28, 2015 8:17 AM **To:** Hart, Beata; Miller, Mark; Conrad, Mark

Cc: Raitt, Blair; Lines, Stephanie Subject: RE: ARC CP audit review

Good morning Beata, thank you for the opportunity to provide comments. Please find attached my comments for consideration. If you have any questions, please don't hesitate to let me know. Thanks again.

From: Hart, Beata

Sent: Friday, April 24, 2015 1:57 PM To: Miller, Mark; Conrad, Mark; Lui, Rachel

Cc: Raitt, Blair

Subject: ARC CP audit review

Hello,

I am contacting you as a member of the audit review committee for the CP Fatigue management national audit. The draft of the audit report is now ready for you input.

Audit procedure specifies a seven working days timeframe for this review, which would brings us to Monday, May 4th. Please let me know if this is not feasible and if additional time is needed. I will ensure to adjust the schedule accordingly and obtain the necessary approval.

Based on the comments received and their complexity, a meeting (conference call) might be required to address your concerns. This will be determined once all comments are received. If, after your review, you would like a meeting nonetheless, please let me know and I will ensure to arrange one.

Below, I included the excerpt from the audit procedure that outlines responsibilities of the review committee, I hope you'll find it helpful.

If you have any questions please do not hesitate to contact me. Best Regards, Beata

Audit Procedure

The ARC is responsible for the following:

Audit Review Committee (ARC)

- Reviews the audit details and provides comments as appropriate;
- Reviews the audit report and provides feedback regarding the following:
 - supporting evidence (in regards to the findings);
 - additional technical advice (when applicable);
 - format:
 - readability;
 - consistency; and
 - clarity in wording

s.20(1)(c)

s.20(1)(d)

s.21(1)**Boan, Susan**

s.21(1)(b) From:

Boan, Susan

Sent:

Wednesday, April 29, 2015 11:05 AM

To:

Hart, Beata

Subject:

RE: ARC CP audit review

For sure.

From: Hart, Beata

Sent: Wednesday, April 29, 2015 11:04 AM

To: Boan, Susan; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon; Nadon, Christine

Subject: RE: ARC CP audit review

I am glad he addressed some of Rachel's issues, saved us some time.

From: Boan, Susan

Sent: Wednesday, April 29, 2015 12:50 PM

To: Hart, Beata; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon; Nadon, Christine

Subject: RE: ARC CP audit review

My comments on a few of Mark's comments. He did have some good comments.

Sue

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To: Boan, Susan; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon; Nadon, Christine

Subject: FW: ARC CP audit review

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s.21(1)(a) s.21(1)(b)

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Beata

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 - format;
 - readability;
 - consistency; and
 - clarity in wording

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP), considering against Safety Management System Regulations (SMS), Transport Canada Work Rest Rules (WRR) for Railway Operating Employees (WRR) and "Fatigue Management Plans, Requirements and Assessment Guidelines" was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management management Planplans, as required by the WRR, and as defined and submitted to Transport Canada by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of the railway company's FMP to ensure compliance to the WRR as well as <u>verify</u> their implementation as defined by the Railway. This assessment was carried out through record reviews, observations and interviews with personnel.

The initial audit notification and the documentation request were was sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team then proceeded to review the records provided and interviewed selected members of the CP¹ management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits were to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes the special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

A closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Alyth facility. Next steps were presented but, due to audit activities still being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

Page 1 of 15

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Comment [rl2]:

Comment [rl3]:

Comment [rl4]: For readability, suggest an extra line return between paragraphs

Comment [rl5]:

Comment [ri6]: Plural above

Comment [ri7]: General comment -Need to be consistent: CP or CPR

s.20(1)(c)

s.20(1)(d)

s.21(1)(a)

s.21(1)(b)

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
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- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003);
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003), and;
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Eleven findings were reported as a consequence of this audit. Findings 771571 and 771601 were identified as

Comment [mc8]:

Comment [rl9]:

Details are provided in the Findings section of this report.

Detailed descriptions of those findings are provided in the Findings section of this report.

The Railway is encouraged to demonstrate how they intend to enhance railway safety by providing a corrective action plan to each of findings of deficiency, within 30 days of the issues of this audit report. The Corrective Action Plan should reference the Transport Canada audit findings and detail the Railway's proposed corrective actions to address them. Each corrective action should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. An example Corrective Action Plan template is attached to this report and it may be used.

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Pursuant to the Railway Safety Act, Transport Canada has conducted a systematic, detailed assessment of railway company policies, processes and procedures to (a) evaluate them against the documentation requirements of the RSMS Regulations; and (b) verify the implementation and effectiveness of said policies, processes and procedures.

Comment [rl10]: Perhaps this can be started on the next page to make more of separation from the executive summary

Comment [rl11]: Spell out

Audit Scope

The scope of this audit was to verify the implementation of the Fatigue Management Plans as defined by CP, considering the requirements of "Work/rest-Rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

The following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities;
- 2(d) Compliance with applicable regulations, rules, standards and orders;
- 2(e) Risk management process;
- 2(h) Skills, training and supervision, and;
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

Page 2 of 15

Comment [rl12]:

Comment [mc13]: TC doesn't approve FMP's, They're the railway's internal plans.

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

The scope includes All-all records providing evidence of compliance with the above processes and all policies, processes, and procedures developed in support of fatigue management, dating back to from January 2010 to present.

Other Issues

-- Comment [rl14]: Why?

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(a)
- s.21(1)(b)

Audit Findings

Finding ID: 771571 Process: 2(d)	Comment [rl15]:
Regulatory Requirement.	Comment [mc16]:
A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable: (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them,	Comment [rl17]: Comment [rc18]:
and; (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption	
Railway Commitment:	
- Work/rest rules for railway operating employees, TC O 0-140, February 2011	Comment [rl19]:
Description of Finding:	
Supporting Details:	
	Comment [rl20]:
	Comment [rl21]:

s.20(1)(c)

s.20(1)(d)

s.21(1)(a)

s.21(1)(b)

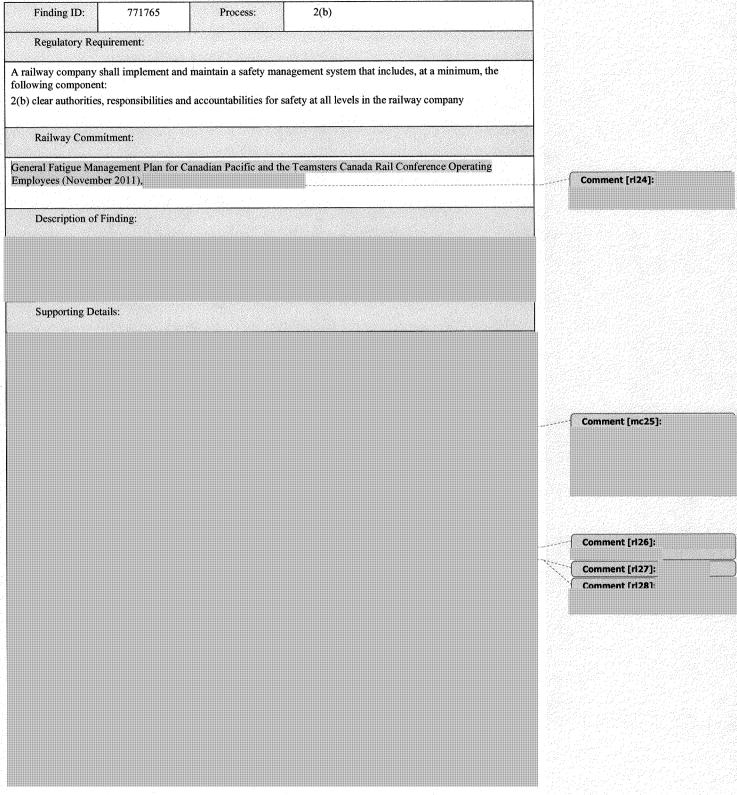
Finding ID:	771601	Process:	2(d)		
Regulatory Req	uirement:	P			
following component 2(d) systems for iden (i) railway safety reg them, and;	: tifying applicable ulations, rules, stan	dards and orders, and	nagement system that includes, at a min	pliance with	
ii) exemptions and the fermion of exemption;	ne procedures for d	emonstrating complian	nce with the terms or conditions specifi	ied in the notice	
Railway commi	tment:				
Work/rest rules for ra	ilway operating en	nplovees, TC O 0-140.	February 2011,		
Description of I	Finding:				
Supporting Det	ails:				Comment [rl22]:
					Comment [rl23]:

Page 5 of 15

s.20(1)(c)

s.20(1)(d)

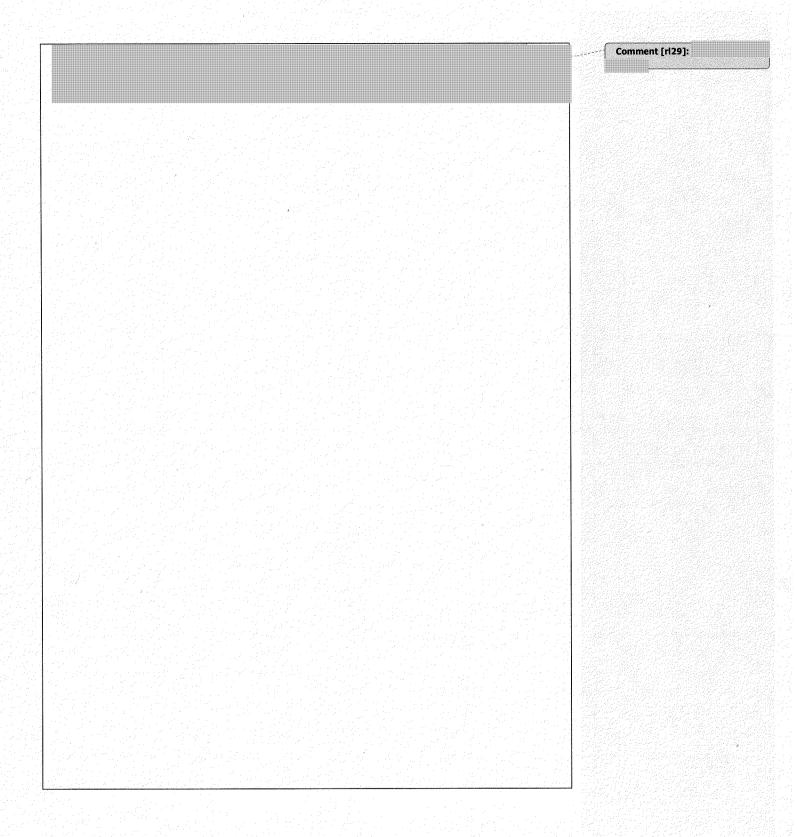
s.21(1)(a)



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s.20(1)(b) s.20(1)(c)

s.20(1)(d)



Page 7 of 15

b) Finding ID:	771781	Process:	2(h)			
Regulatory Req	uirement:					
following component 2(h) systems for	; r ensuring that emp ve appropriate skill	ployees and any other p	ersons to whom the raily	cludes, at a minimum, the way company grants accer re that they comply with	ess to	
Railway Comm	itment:					
General Fatigue Man Employees (Novemb	agement Plan for O er 2011),	Canadian Pacific and th	e Teamsters Canada Rai	1 Conference Operating		
Description of I	Finding:					
						Comment [mc30]:
Supporting Det	ails:					
Supporting Det	ails:					
Supporting Det	ails:					
Supporting Det	ails:					
Supporting Det	ails:					
Supporting Det	ails:					Comment [ri31]: Missing a
Supporting Det	ails:					Comment [rl31]: Missing a
Supporting Det	ails:					
Supporting Det	ails:					
Supporting Det	ails:					Comment [mc32]: Comment [mc33]: Concur
Supporting Det	ails;					Comment [mc32]:
Supporting Det	ails:					Comment [mc32]: Comment [mc33]: Concur comments below

Page 8 of 15

s.20(1)(b) s.20(1)(c)

s.20(1)(d)

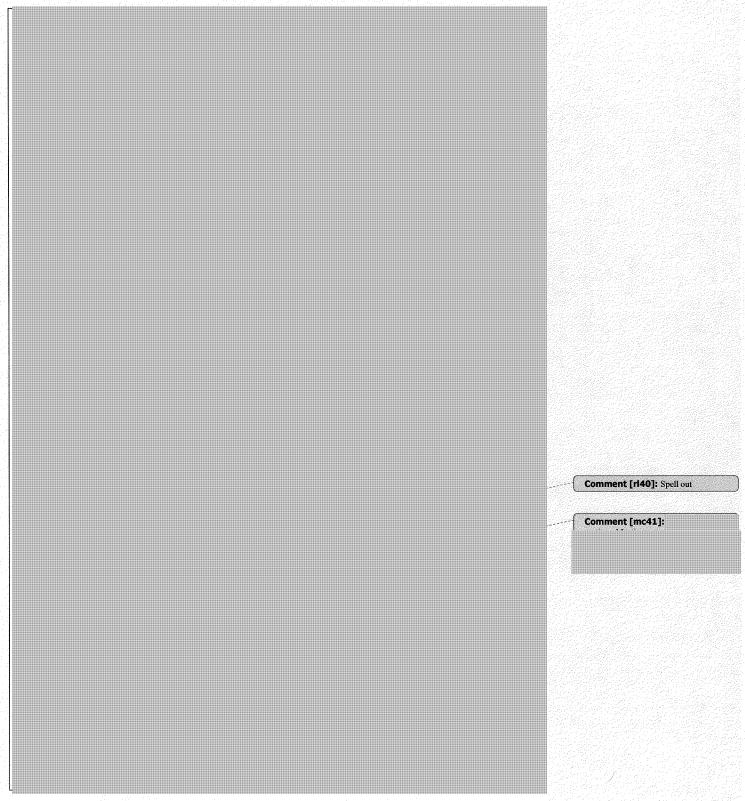
Finding ID:	771786	Process:	2(d)	
Regulatory Req	uirement:			
following componen 2(d) systems for iden (i) railway safety reg them, and;	t: itifying applicable ulations, rules, sta	ndards and orders, and t	agement system that includes, ne procedures for demonstratin ce with the terms or conditions	ing compliance with
Railway Comm	itment:			on this section;
General Fatigue Man Employees (Novemb	nagement Plan for	Canadian Pacific and the	Teamsters Canada Rail Confe	ference Operating
Supporting Det	ails:			
				Comment [rl39]: Perhaps this can be made into one sentence

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s.20(1)(c)

s.20(1)(d)

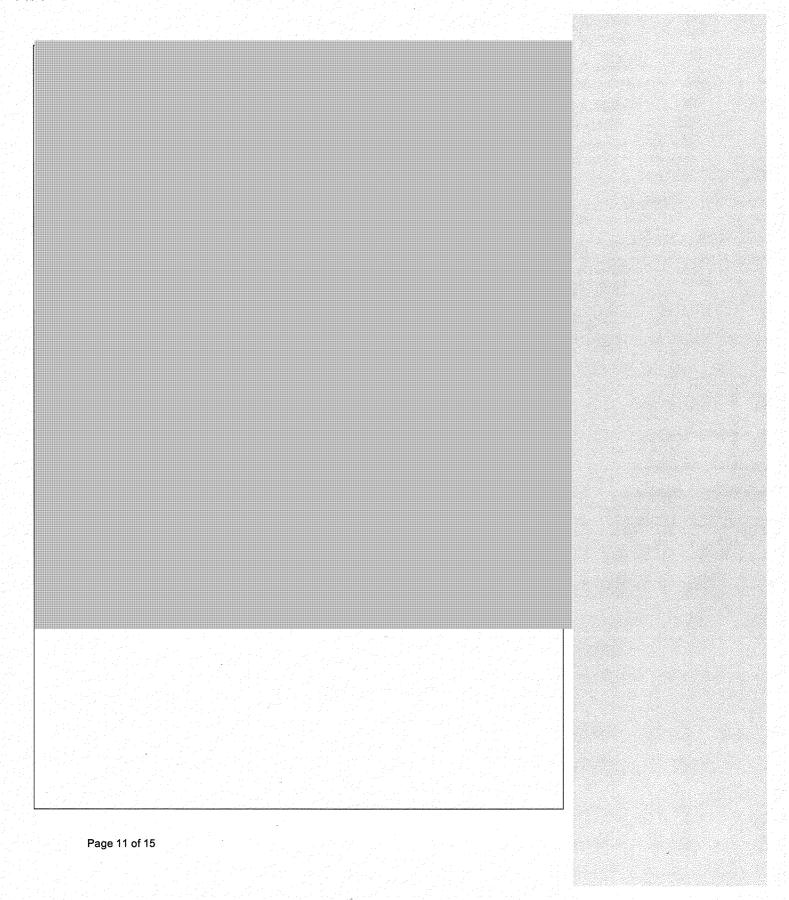
s.21(1)(a)



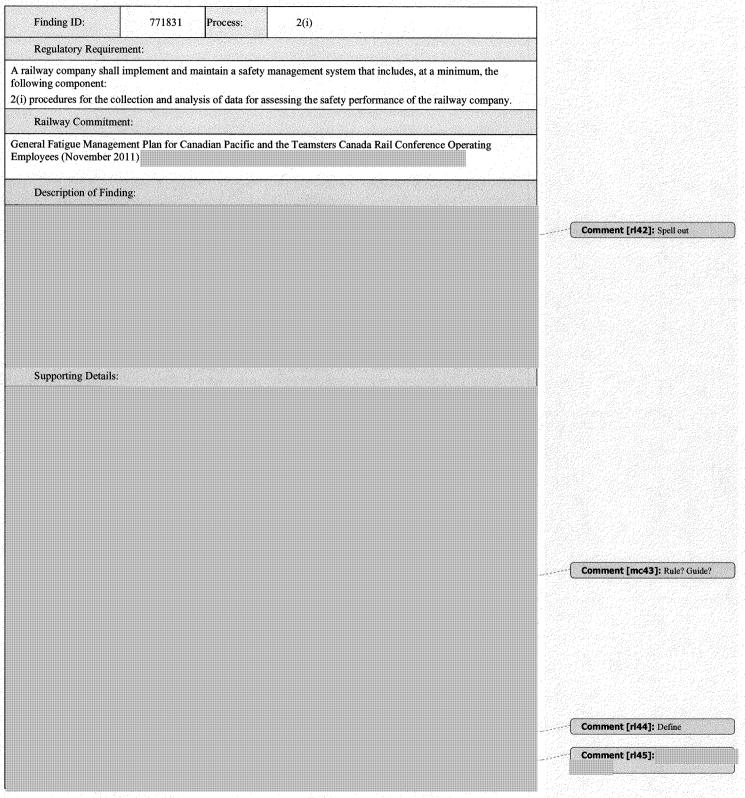
Page 10 of 15

s.20(1)(c)

s.20(1)(d)



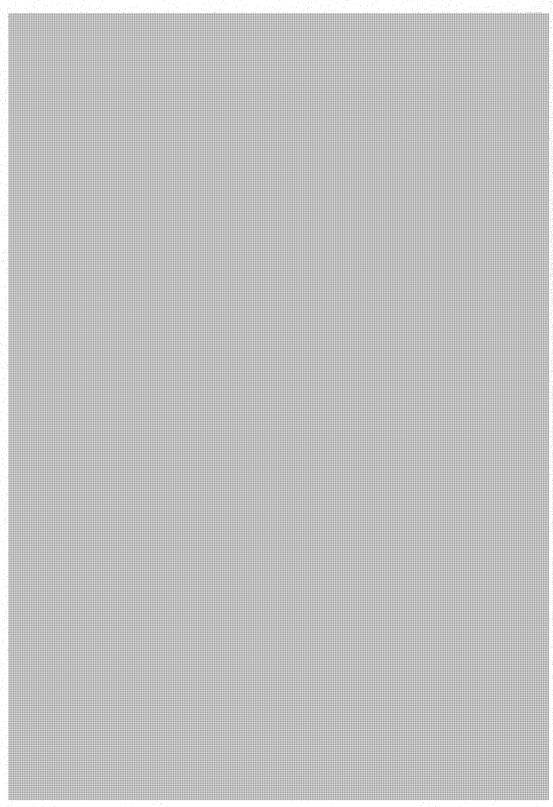
- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



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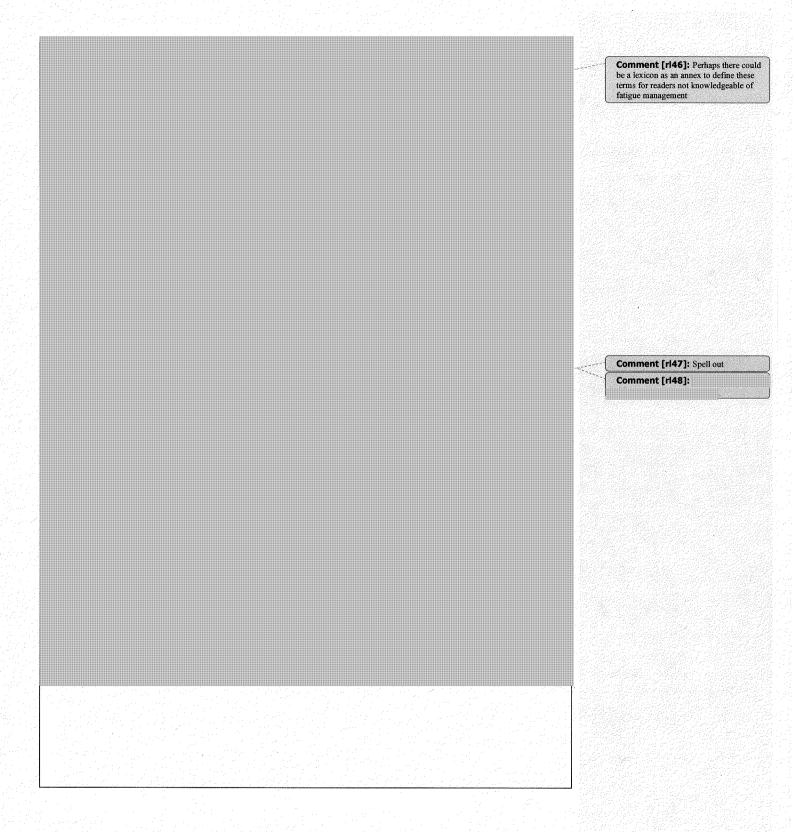
s.20(1)(c)

s.20(1)(d)



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- s.20(1)(b) s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)



Page 14 of 15

- s.20(1)(b) s.20(1)(c)
- s.20(1)(d)
- s.21(1)(b)

Regulatory Requirement:	
way company shall implement and maintain a safety management system that includes, at a minimum ving component: ystems for identifying applicable lway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance and	e with
temptions and the procedures for demonstrating compliance with the terms or conditions specified in temption.	the notic
Railway Commitment:	
ral Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operation (November 2011)	ing
Description of Finding:	
Supporting Details:	

000208

Boan, Susan

From:

Hart, Beata

Sent:

Friday, April 17, 2015 12:53 PM

To:

Boan, Susan; Zimmermann, Kyla; LeFort, Pierre; Couture, Paul-Simon

Cc:

Nadon, Christine; Raitt, Blair

Subject:

CP_Fatigue_management_Audit_report-2015-04-17

Attachments:

CP_Fatigue_management Audit report-2015-04-17.docx

Hello,

I had to make some additional changes to the draft report.

We have it now addressed by having them only in the Executive Summary section.

I also had to combine the Executive Summary and the Introduction sections as the text printed in the RSIG template is standard for Introduction and it cannot be changed. The section is still there but with the standard text and the information that was there before was moved to the Executive Summary (most of it – some seemed to be duplicate so it was removed).

No content of findings was changed.

Please review and provide comments.

Regards,

Beata

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP), considering Safety Management System Regulations (SMS), Transport Canada Work Rest Rules for Railway Operating Employees (WRR) and Fatigue Management Plans, Requirements and Assessment Guidelines" was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as required by the WRR, and as defined by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the WRR as well as their implementation as defined by the Railway. This assessment was carried out through record reviews, observations and interviews with personnel.

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team then proceeded to review the records provided and interviewed selected members of the CP' management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits were to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes the special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

A closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Alyth facility. Next steps were presented but, due to audit activities still being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by the Railway Association of Canada and provided by CPR (February 2011);
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003);
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003);
 Page 1 of 15

- s.20(1)(b)
- s.20(1)(c)
- s.20(1)(d) s.21(1)(b)

RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

Eleven findings were reported as a consequence of this audit. Findings 771571 and 771601 were identified as Details are provided in the Findings section of this report.

Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003), and;

Detailed descriptions of those findings are provided in the Findings section of this report.

The Railway is encouraged to demonstrate how they intend to enhance railway safety by providing a corrective action plan to each of findings of deficiency, within 30 days of the issues of this audit report. The Corrective Action Plan should reference the Transport Canada audit findings and detail the Railway's proposed corrective actions to address them. Each corrective action should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. An example Corrective Action Plan template is attached to this report and it may be used.

Introduction

Pursuant to the Railway Safety Act, Transport Canada has conducted a systematic, detailed assessment of railway company policies, processes and procedures to (a) evaluate them against the documentation requirements of the RSMS Regulations; and (b) verify the implementation and effectiveness of said policies, processes and procedures.

Audit Scope

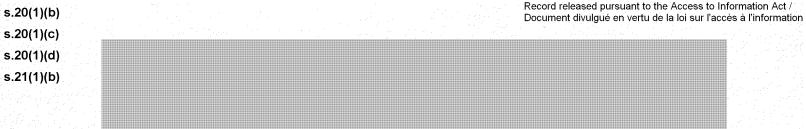
The scope of this audit was to verify the implementation of the Fatigue Management Plans as defined by CP, considering the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

The following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities;
- 2(d) Compliance with applicable regulations, rules, standards and orders;
- 2(e) Risk management process;
- 2(h) Skills, training and supervision, and;
- 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues



s.20(1)(c) s.20(1)(d)

Audit Findings

Finding ID:	771571	Process:	2(d)		
Regulatory Req	airement:				
following component 2(d) systems for iden (i) railway safety regu and;	: tifying applicable: ılations, rules, standa	naintain a safety mana ards and orders, and the monstrating compliance	ne procedures for de	emonstrating complian	nce with them,
Railway Comm			Property of the second		1170100 - 1800 1170100 - 1800 1170100 - 1800 1170100 - 1800
- Work/rest rules	for railway operating	gemployees, TC O 0-1	40, February 2011		
Description of I	inding:				
Supporting Deta	ills:				

Record released pursuant to the Access to Information Act / Document divulgué en vertu de la loi sur l'accès à l'information

s.20(1)(b)

s.20(1)(c)

s.20(1)(d) Finding ID: 771601 Process: 2(d) s.21(1)(b)

Regulatory Requirement:

A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component:

- 2(d) systems for identifying applicable
- (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with them, and;
- (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption;

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Work/rest rules for railway operating employees, TC O 0-140, February 2011

Description of Finding:

Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d) Finding ID: 771765 Process: 2(b) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(b) clear authorities, responsibilities and accountabilities for safety at all levels in the railway company Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011), Description of Finding: Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d) Finding ID: 771781 2(h) Process: s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component; 2(h) systems for ensuring that employees and any other persons to whom the railway company grants access to its property, have appropriate skills and training and adequate supervision to ensure that they comply with all safety requirements; Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:

s.20(1)(c)					
s.20(1)(d) s.21(1)(b)	Finding ID:	771786	Process:	2(d)	
	Regulatory Requ	uirement:			
	following component 2(d) systems for ident (i) railway safety regu	: tifying applicable:		agement system that includ	
	them, and; (ii) exemptions and the of exemption.	ne procedures for o	demonstrating compliance	ce with the terms or conditi	ons specified in the notice
	Railway Comm	itment:			
	General Fatigue Man Employees (November		Canadian Pacific and the	Teamsters Canada Rail Co	onference Operating
	Description of F	inding:			
	Supporting Deta	alle:			
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s.20(1)(b)

s.20(1)(c) s.20(1)(d)

s.21(1)(b)



s.20(1)(d) s.21(1)(b)

s.20(1)(b)

s.20(1)(c)

s.20(1)(b) s.20(1)(c) s.20(1)(d) Finding ID: 771831 Process: 2(i) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(i) procedures for the collection and analysis of data for assessing the safety performance of the railway company. **Railway Commitment:** General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b) s.20(1)(b) s.20(1)(c) s.20(1)(d) Finding ID: 771875 Process: 2 (d) s.21(1)(b) Regulatory Requirement: A railway company shall implement and maintain a safety management system that includes, at a minimum, the following component: 2(d) systems for identifying applicable (i) railway safety regulations, rules, standards and orders, and the procedures for demonstrating compliance with (ii) exemptions and the procedures for demonstrating compliance with the terms or conditions specified in the notice of exemption. **Railway Commitment:** General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011) Description of Finding: Supporting Details:

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Audit Report

Railway:

CP Rail

Railway SMS

Keith Shearer

Representative:

GM Regulatory & Operating Practices

Audit Dates:

January 5, 2015 to March 6, 2015

Convening Authority:

Stephanie Lines, Director, Operations Management

Audit Team Leader:

Beata Hart, Safety Oversight and Audit Officer

Report date:

XXXXXXXXX, 2015

Executive Summary

An audit of the CP Rail (CPR) fatigue management plans (FMP) and in light of Safety Management System Regulations (SMS) was conducted by Transport Canada (TC) from January 5, 2015 to March 6, 2015. The objective of the audit was to evaluate and verify CPR's implementation of the Fatigue Management Plan, as defined by CP and submitted to Transport Canada.

This was accomplished through a systematic, detailed assessment of railway company FMP to ensure compliance to the WRR as well as their implementation as defined by the Railway. This assessment was carried out through record reviews and interviews with personnel.

The following provides an overview of the findings. Each one requires a corrective action:

s.20(1)(b) s.20(1)(c) s.20(1)(d) s.21(1)(b)

Introduction

Pursuant to the Railway Safety Act, TC has conducted a systematic, detailed assessment of CP's policies, processes and procedures to evaluate and verify their implementation of the Fatigue Management Plans, as defined by CP and submitted to Transport Canada, and to verify development, implementation and monitoring of fatigue management methodologies as required by "Work/rest rules for railway operating employees" and "Fatigue Management Plans Requirements and Assessment Guidelines".

In addition to above mentioned requirements, following components of the SMS Regulations were also used as basis of the audit:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
- 2(i) Collection and analysis of safety performance data

The initial audit notification and the documentation request were sent to CPR on November 28, 2014.

The on-site auditing activities began on January 5, 2015 and the opening meeting was held at CPR's corporate offices in Calgary. During that meeting, the audit team confirmed the scope of the audit and the proposed schedule. The audit team proceeded to review the records provided and interviewed selected members of CP

Page 2 of 13

s.20(1)(b)

s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

management team. Subsequently, TC visited CP corporate offices the week of January 26th and on March 6 to further verify records and to interview personnel.

Regional verification activities took place the week of January 19 (Vancouver) and March 3 (Calgary, Toronto and Vancouver). The purpose of these visits was to interview local Management and Operating employees to verify implementation of the FMP.

TC recognizes special circumstances that developed due to the work stoppage caused by the union strike activity the week of February 16. The auditing activities scheduled for that week were postponed and the audit commenced the week of March 2, 2015.

Closing meeting summarizing the audit activities was conducted as part of the wrap-up meeting on March 5 at the Calgary Agincourt facility. Next steps were presented but, due to the activities being performed at other facilities at the same time, no potential findings were communicated.

The audit team reviewed the following policies, processes and procedures, which were provided by CPR:

- General Fatigue Management Plan for Canadian Pacific and the Teamsters Canada Rail Conference Operating Employees (November 2011);
- Work/rest Rules for Railway Operating Employees, as published by Railway Association of Canada and provided by CPR.
- Specific Fatigue Management Plan, Emergency Situations (March 17, 2003)
- Specific Fatigue Management Plan, 64 hours in 7 days (March 17, 2003)
- Specific Fatigue Management Plan, Work Train Service over 12 hours (March 17, 2003)
- RAC Work/Rest Rules, Interpretation Document (Effective June 29, 2005)

A response to this audit is required within 30 days from the issue of this report, and must include a corrective action plan to address each of the findings from this audit. The corrective action plan should describe activities to be completed, identify personnel responsible, and outline timelines for implementation. CPR will be responsible for submitting evidence of implementation of planned corrective actions per the timelines outlined in their corrective action plan. TC must be notified of any changes to the corrective action plan.

Audit Scope

The scope of this audit was the implementation of the Fatigue Management Plans as defined by CP and in light of the requirements of "Work/rest rules for railway operating employees" and "Fatigue Management Plans, Requirements and Assessment Guidelines".

Following components of the Safety Management Systems Regulations were also applicable:

- 2(b) Safety authorities, responsibilities and accountabilities
- 2(d) Compliance with applicable regulations, rules, standards and orders
- 2(e) Risk management process
- 2(h) Skills, training and supervision
 - 2(i) Collection and analysis of safety performance data (since fatigue is safety-related)

All records providing evidence of compliance with the above processes and all policies processes and procedures developed in support of fatigue management, dating back to January 2010 to present.

Other Issues

- s.20(1)(b)
- s.20(1)(c) s.20(1)(d)
- s.21(1)(b)

Audit Findings

The audit findings listed below require corrective actions. The Railway is required to provide a corrective action plan in response to each audit finding.

Finding ID:	771571	Process:	2(d)	
Regulatory Req	uirement:			
following component 2(d) systems for ident (i) railway safety reguland	: tifying applicable ulations, rules, standa	ards and orders, and the		les, at a minimum, the rating compliance with them, ions specified in the notice of
Railway Comm				
- Work/rest rules	for railway operating	employees, TC O 0-14	0, February 2011	
Description of F	inding:			
Supporting Deta	iils:			

s.20(1)(b) s.20(1)(c) s.20(1)(d)

s.21(1)(b)

Finding ID:	771601	Process:	2(d)	
Regulatory Requi	rement:			
following component: 2(d) systems for identificity railway safety regulathem, and (ii) exemptions and the	fying applicable ations, rules, stand	dards and orders, and	the procedures for	that includes, at a minimum, the r demonstrating compliance with s or conditions specified in the notice
of exemption; Railway commitr	nent:			
Work/rest rules for rail	way operating em	ployees, TC O 0-140,	February 2011,	
Description of Fi	nding:			
Supporting Detai	ls:			

Regulatory Requirement: A railway company shall implement and maintain a safety management system following component: 2(b) clear authorities, responsibilities and accountabilities for safety at all level Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Car Employees (November 2011), Description of Finding: Supporting Details:	
following component: 2(b) clear authorities, responsibilities and accountabilities for safety at all level Railway Commitment: General Fatigue Management Plan for Canadian Pacific and the Teamsters Car Employees (November 2011), Description of Finding:	
General Fatigue Management Plan for Canadian Pacific and the Teamsters Can Employees (November 2011), Description of Finding:	
Description of Finding:	
	nada Rail Conference Operati
Supporting Details:	

s.20(1)(d)	
s.21(1)(b)	
<u> </u>	
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많은 사람 가을 하는 아니라는 돈을 내려 있는 사람들이 하는 하다 나는 것이 없는 것이다.	
눈님 점점 이 하는 모든 호텔 이번 사람이 이렇게 되었다. 하는 사람들이 되었다고 하는데	
이 유명 열 나는 모바로 달라고 한 번째 하고 있다. 이 모든 이 이 이 이 나고, 그는 모양하다	
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양종 충격 보고 보다의 작은 그들이는 그리트리의 이 경기에 그리고 시하는 것이 되고 있다.	
어느하다 하는 사람들은 사람들은 하는데 그 하는데 하는 그를 먹는다는 나는데 모다	
했습니다 하는 것이 사용하는 것이 나는 그들은 사람이 되었다. 그 그리는 사람은 사람이다.	
경기화에 그렇게 하고 있는데요요 그런 네트를 가게 하고 있다면 다른데 요.	
유럽지대 생활하는 물론하였으라 하면 하는 물건은 바꾸 이 사람들은 생활하게 하다.	
당하면서 하는 마음 방문에 가장이 하는 학자들이 되었다는 것 같아 하는 것이다.	
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내용 사람이 하고 있는데 나는데 나는데 나를 하는데 되는데 되는데 나를 보는데 그리다.	
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생물보다 어린, 마리는 말을 되고 되었다면 하다고 있다. 그리고 하는 말을 보고 하나 다	
생생님, 그 보는 방문 사람이 되는 사람들은 눈이 된 사람이 하는 사람들이 하는 것같은 때	
보기로 내려는 그렇다 스로그램 요즘 이렇게 하는 물이 들은 일을 보고 있다.	
발표를 계고 한 리스 하스 하지 연구는 데 기소에게 하지만 한 사고를 보자 없어 되었다.	
화장 11.1 마토막 그는 동생들은 그는 이 말을 하고 하는데 하는데 말을 하는데 되었다.	
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[[[[[[[[[[[[[[[[[[[[[
용도를 되는 다른 문장들이 하는 다른 살아가는 함께 모르면 살아가지 않는 것이 하는 것이 하는데 하다고 있다.	
유명하게 그는 항상 전문에 만했다. 하는 이 보고 있는 사람은 사람들이 되었다.	
불병 대표 이 회장인 과 보조를 받아 이 보는 그리고 있는 이 시간 보고 하고 되었다.	
발생들하게 되고 있는 이 학생들은 사람들은 사람들이 하는 것은 사람들이 가장 그렇게 하는 것이다.	
이 없면 네트림을 모디로 돌아왔다. 이 그는 마시아를 보고 나는 그를 내려왔다. 이 배를 모르는 것	
[하루 >] [다음 : # 다음 보는 다음이 말을 하는 그를 하는 것 같아요.]	
ang pagamat <u>kanala at ang at tining indigitation and an ang ang dapat ang indigitation</u> di indigitation and ang Banalang	

s.20(1)(b)			
s.20(1)(c)			
s.20(1)(d)			
s.21(1)(b)	Finding ID:	771781	Pro

Finding ID:	771781	Process:	Training
Regulatory Rec	quirement:		
following componer 2(h) systems for	nt; or ensuring that employee appropriate skills	oyees and any other p	ersons to whom the railway company grants access to quate supervision to ensure that they comply with all
Railway Comn	nitment:		
General Fatigue Mar Employees (Novemb		nnadian Pacific and th	e Teamsters Canada Rail Conference Operating
Description of	Finding:		
Supporting De	tails:		

s.20(1)(d)

.2		

following component: 2(d) systems for ident	nall implement and	maintain a safety man	
following component: 2(d) systems for ident		maintain a safety man	1111111111
them, and	lations, rules, stand		he procedures for demonstrating compliance with
Railway Commi	tment:		
General Fatigue Mana Employees (Novembe		anadian Pacific and the	e Teamsters Canada Rail Conference Operating
Description of F	inding:		
Supporting Deta	ils:		

)(d)				
)(b)				
쁴뇶쁔놙빏				

s.20(1)(d) s.21(1)(b)

Finding ID:	771831	Process:	2(i)			
Regulatory Require	ment:	The second second				
A railway company shall following component: 2(i) procedures for the co						
Railway Commitme	ont:					
General Fatigue Manager Employees (November 2		nadian Pacific and	the Teamsters Ca	nada Rail Confei	ence Operating	
Description of Find	ing:					
Supporting Details:						

Page 11 of 13

s.20(1)(d) s.21(1)(b)

s.20(1)(b) s.20(1)(c)

s.20(1)(d)

s.21(1)(b)

Finding ID:	771875	Process:	2 (d)	
Regulatory Red	quirement:			
following component 2(d) systems for ident (i) railway safety reg them, and	nt: ntifying applicable gulations, rules, stand	lards and orders, and t	he procedures for dem	onstrating compliance with
Railway Comn	nitment:			
General Fatigue Ma Employees (Novemb		anadian Pacific and th	e Teamsters Canada R	ail Conference Operating
Description of	Finding:			
Supporting De	tails:			

Page 238 is withheld pursuant to sections est retenue en vertu des articles

21(1)(b), 20(1)(c)

of the Access to Information Act de la Loi sur l'accès à l'information

Pages 239 to / à 240 are withheld pursuant to sections sont retenues en vertu des articles

20(1)(b), 20(1)(d), 21(1)(b), 20(1)(c)

of the Access to Information Act de la Loi sur l'accès à l'information