



CANADIAN OILSEED PROCESSORS ASSOCIATION

September 20, 2021

303015

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VIA E-Filing

Cynthia T. Brown
Chief, Section of Administration
Office of Proceedings
Surface Transportation Board
395 E Street, S.W.
Washington, D.C. 20423-0001

ENTERED
Office of Proceedings
September 20, 2021
Part of
Public Record

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MEMBERS:
ADM Agri-Industries Company
Bunge North America
Cargill Limited
Louis Dreyfus Company Canada ULC
Richardson Oilseed Limited
Viterra Oilseed Processing

**Re: Docket No. EP 768, Petition for Rulemaking to Adopt Rules Governing
Private Railcar Use by Railroads**

Dear Ms. Brown,

The Canadian Oilseed Processors Association (COPA) requests that this letter be accepted into the record in the above-captioned proceeding in support of the petition asking the Surface Transportation Board (STB) to initiate a rulemaking proceeding that would provide appropriate financial incentives for the Class I railroads to utilize private railcars more efficiently.

COPA is a national organization representing the collective interests of the companies that own and operate 14 oilseed processing facilities in Canada. In 2020, the oilseed processing industry in Canada produced more than 12 million tonnes of vegetable oil and meal, supplying global customers in the food processing, animal feed and biofuel sectors. Nearly half of this output is destined to customers in the United States, our largest and most important market.

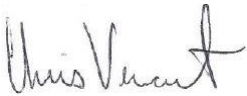
Railway transportation is the lifeblood of our industry. Almost all the oil and meal shipped to the United States moves by rail on multiple carriers. Collectively, COPA members own or lease more than 8,000 railcars (tank and hopper), representing a significant capital investment. These investments have improved the operational and financial efficiency of the rail carriers, however, there is limited accountability placed on rail carriers when these assets are cycled between origin and destination.

While railways impose demurrage charges for any train delays beyond times for loading and unloading at origin and destination, there is no reciprocal charge on railways when delays occur enroute. This lack of reciprocity negatively impacts car cycle times and compromises the efficiency of the entire supply chain.

An update to the rules governing the railroads' use of private railcars is needed to incentivize the efficient utilization of these investments, which would be similar to the standards railroads have long enforced on shippers and other carriers for their own assets.

In this regard, COPA supports the North America Freight Car Association ("NAFCA"), The National Grain and Feed Association ("NGFA"), The Chlorine Institute ("CI"), and The National Oilseed Processors Association ("NOPA") petition for rulemaking to adopt rules governing private railcar use by railroads.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris Vervaet". The signature is fluid and cursive, with a prominent initial "C" and a stylized "V".

Chris Vervaet
Executive Director
COPA