# Code of Practice for the Environmental Management of Road Salts

Overview of Data Reported for 2014-2021 in the Context of National Targets

May 2022





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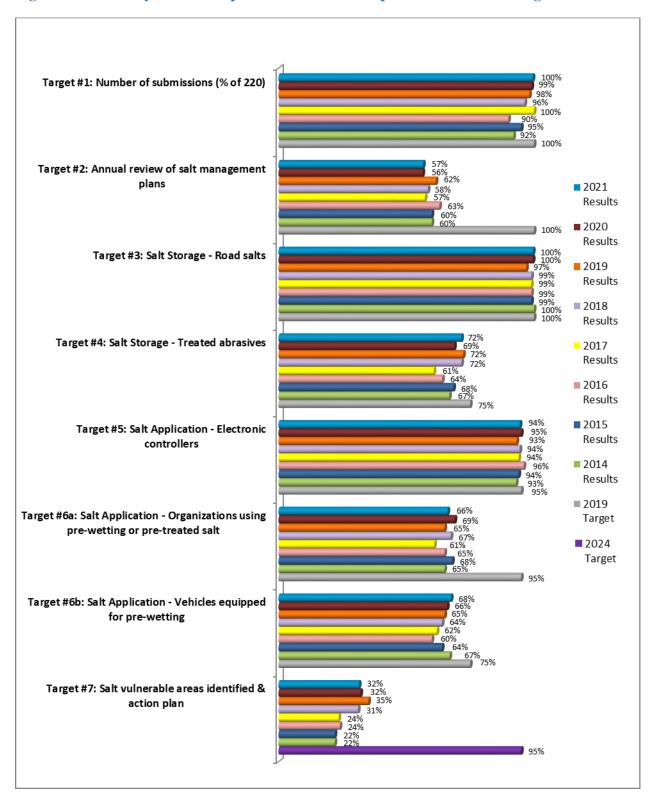


# **Overview**

In December 2014, Environment and Climate Change Canada set seven Performance Indicators and National Targets in order to monitor the effectiveness of the Code of Practice for the Environmental Management of Road Salts (the Code).

The following results (Figure A) have been reported by federal, provincial, municipal and private road organizations that adopted the Code and are compared with the National Targets (#1-6) set for 2019 (Target #7 is set for 2024). Data submitted in annual reports are compiled and analyzed for a winter period, which is generally from November of one year to April of the next year. Throughout the report, a reporting year is represented by the final year of that winter (e.g. 2021 represents the winter starting in 2020 and ending in 2021). Note that some year-to-year variation in results exists due to variance in the number of reports submitted annually.

Figure A: Summary results for performance and comparison to national targets



## **Highlights\*: 2021 Reported Data in the Context of National Targets**

# Results reported for winter **2020-2021**:

- o 219 road organizations, including 7 provinces, 1 territory, 195 municipalities, 5 private road organizations, 11 national parks and other federal organizations, reported under the Code (target is 220).
- o 57% annually reviewed their road salt management plan (target is 100%).
- o 100% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 72% of their treated abrasives are covered (target is 75%).
- o 94% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 66% are using pre-wetting or pre-treated salts (target is 95%).
- o 68% of their vehicles are equipped for pre-wetting (target is 75%).
- o 32% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

<sup>\*</sup> See Annex 1 for highlights of past reporting seasons

# **Background**

The Code of Practice for the Environmental Management of Road Salts (the Code) was developed in 2004 to assist municipal and provincial road organizations to better manage their use of road salts in a way that reduces the harm to the environment while maintaining roadway safety. The Code recommends that road organizations that use over 500 t/year of salt or who have salt-vulnerable areas in their territory review their existing winter maintenance operations to improve practices and reduce adverse impacts of salt releases in the environment. This includes the development and implementation of salt management plans identifying actions they will take to improve practices in salt storage, use of salts on roads, snow disposal and protection of salt-vulnerable areas. In addition, the Code requires road organizations to provide an annual report<sup>1</sup> on the progress achieved.

Of note, in Quebec, a Strategy for the Environmental Management of Road Salts was launched in 2010. Every administration that manages and maintains roads in Quebec is invited to participate in the Strategy on a voluntary basis. As a result, the federal Code is not implemented in Quebec. However, the general objectives of the Code and of the Strategy are similar. In 2019, the province conducted a five-year study during which an online questionnaire was made available to all municipalities to learn about best management practices in place. Sixty-four municipalities responded to the questionnaire. The survey results are published on the Quebec Strategy website (<a href="https://www.transports.gouv.qc.ca/fr/gestion-environnementale-sels-voirie/Pages/default.aspx">https://www.transports.gouv.qc.ca/fr/gestion-environnementale-sels-voirie/Pages/default.aspx</a>; French only).

# **Results**

The Five-year Review of Progress<sup>2</sup> (2005–2009) to measure the effectiveness of the Code was published in April 2012 and is available online. Based on the review, Environment and Climate Change Canada recommended maintaining the Code and encouraged road organizations to continue improving their salt management. However, at the time of the first review, the lack of targets created challenges in determining whether the objective of the Code had been achieved. It was recommended that the list of performance indicators for future evaluations be examined to ensure that they reflect key components of the Code and current techniques in winter maintenance.

<sup>&</sup>lt;sup>1</sup> The information is submitted directly to Environment and Climate Change Canada through its <u>Single Window Information Manager System</u> (ECCC's SWIM) by June 30 of each year.

<sup>&</sup>lt;sup>2</sup> See report: Five Year Review of Progress: Code of Practice for the Environmental Management of Road Salts (Environment Canada, 2012).

In 2014, Environment and Climate Change Canada published Performance Indicators and National Targets for the Code of Practice for the Environmental Management of Road Salts for the implementation of best practices so that progress can be tracked and the success of the Code can be evaluated. The main objective for setting national targets was to increase environmental protection. All road organizations are expected to reach a minimum level of progress in the implementation of best practices to prevent and reduce negative impacts from road salts. National targets help to monitor progress in specific areas of the Code and form the basis for the second evaluation of the Code currently underway.

There are seven performance indicators (with six targets set for 2019 and one for 2024) that fall under four main activities of the Code (adoption of the Code, salt storage, salt application and salt-vulnerable areas) as summarized and illustrated above (Figure A). The following results are based on the analysis of data reported annually by road organizations under the Code since 2009 where available, and therefore include data reported before and after the publication of the national targets in 2014.

• Performance indicator 1: "Submission of annual reports" represents the number of road organizations reporting regularly (Figure B). The purpose of this indicator is to increase the level of implementation of the Code and best practices in road salt management. Data reported prior to 2009 are referenced in this indicator to illustrate progress over time. Overall, the number of submissions has increased since 2011 and exceeded the target in 2017. Table 1 also presents the breakdown of organizations by type that have reported since winter 2014. Annex 2 presents the list of road organizations that reported in 2021.

Figure B: Number of reports submitted by road organizations to Environment and Climate Change Canada

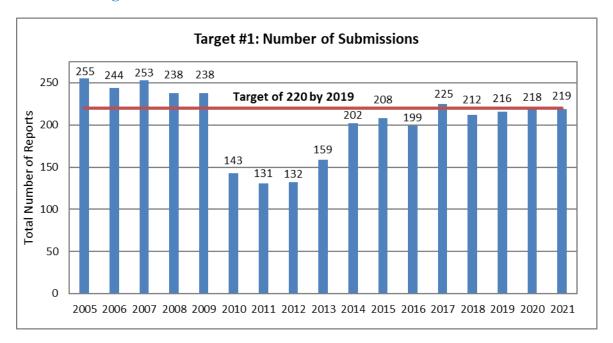


Table B: Breakdown of the type of road organizations that have reported under the Code for winter seasons 2014 through 2021

Type of road organization	2014	2015	2016	2017	2018	2019	2020	2021
Provinces and territories	8	8	9	9	9	9	9	8
Municipalities	180	184	175	200	187	189	194	195
National parks and other federal organizations	10	11	10	10	11	11	10	11
Private organizations	4	5	5	6	5	7	5	5
Total number of reporting organizations	202	208	199	225	212	216	218	219

• Performance indicator 2: "Annual review of salt management plan" represents the percentage of road organizations that annually review their salt management plan when compared to all organizations that report to the code (Figure C). The objective of this indicator is to ensure that planning is current and allows for continuous improvement. Road organizations should revisit their salt management plan at the end of each winter in order to identify shortcomings, issues and areas where improvements are needed prior to

the start of the next winter season. Information on the annual review of salt management plans is not available for 2009 to 2012.

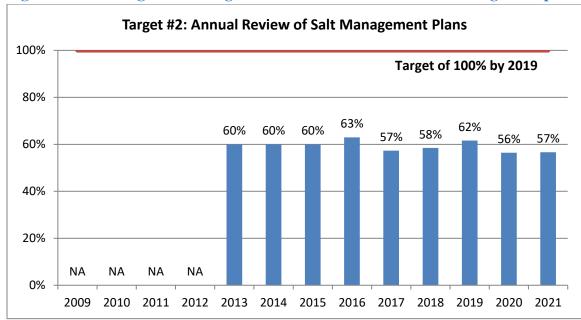


Figure C: Percentage of road organizations that review their salt management plan

Performance indicator 3: "Storage of road salts" represents the percentage in tonnes
of road salts stored under a permanent roof and on impermeable pads (Figure D). The
objective of this indicator is to ensure that road organizations have committed to
managing their material storage facilities and that best practices are applied at point
sources to prevent the release of salt to the environment.

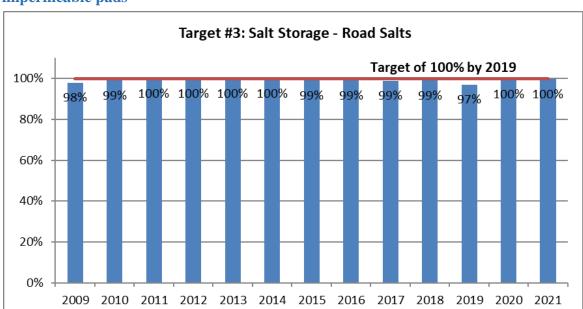
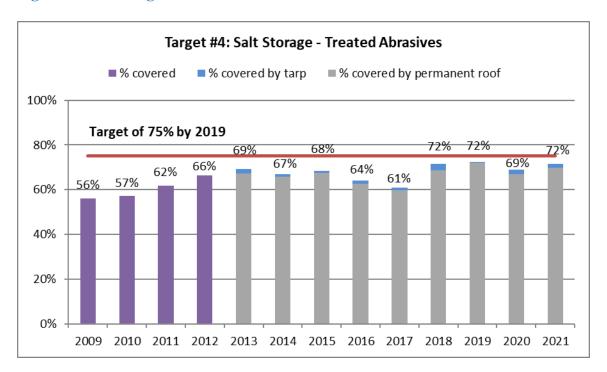


Figure D: Percentage of road salts stored under a permanent roof and on impermeable pads

• Performance indicator 4: "Storage of treated abrasives" represents the percentage in tonnes of treated abrasives (blended sand and salt) that are stored under cover, either under a tarp or under a permanent roof (Figure E). The objective of this indicator is to ensure that road organizations properly cover their treated abrasives in storage facilities and that best practices are applied at point sources to prevent the release of salt to the environment. Detail on the type of cover (tarp or permanent roof) is not available for 2009-2012.

Figure E: Percentage of treated abrasives stored under cover



• Performance indicator 5: "Groundspeed electronic controllers" represents the percentage of vehicles equipped with groundspeed electronic controllers when compared to the total number of vehicles assigned to solid salt application (Figure F). The objective of this indicator is to ensure that salt is applied at a proper rate regardless of the speed of the truck being used to spread the salt and that salt stops discharging when the truck is stopped. Over time use of this technology is expected to become a core practice for all organizations to optimize the use of salt. The percentage of vehicles equipped with groundspeed electronic controllers has increased since 2009 and reached the target in both 2016 and 2020.

Target #5: Salt Application - Electronic Controllers

Target of 95% by 2019

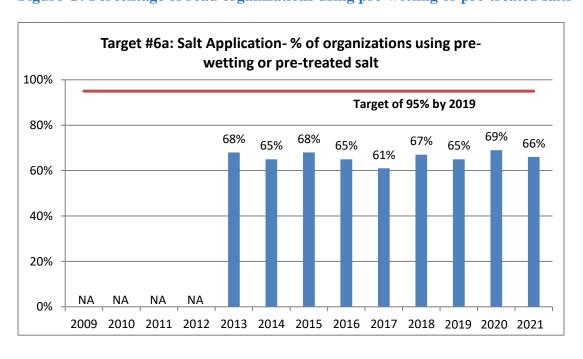
80% 88% 88% 91% 93% 93% 94% 96% 94% 94% 93% 95% 94%

60% 20% 2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021

Figure F: Percentage of vehicles equipped with groundspeed electronic controllers

• Performance indicator 6: "Optimization of salt application" indicates if organizations are adopting practices that enhance their salt application techniques to optimize their use of salt either by using pre-wetting and/or pre-treated salts (Figure G) or by increasing their pre-wetting capacity (Figure H). The objective of this indicator is to ensure that organizations are using advanced technologies such as pre-wetting to reduce the use of salts and pre-treated materials proven to be a cost-effective alternative to road salts with similar results. While data for use of pre-wetting are available for all years since 2009, data for use of pre-treated salts are not available for 2009-2012.

Figure G: Percentage of road organizations using pre-wetting or pre-treated salts



Target #6b: Salt Application - % of Vehicles Equipped for Prewetting 100% Target of 75% by 2019 80% 71% 67% 68% 68% 66% 65% 65% 64% 64% 62% 60% 60% 60%

Figure H: Percentage of vehicles equipped for pre-wetting

40%

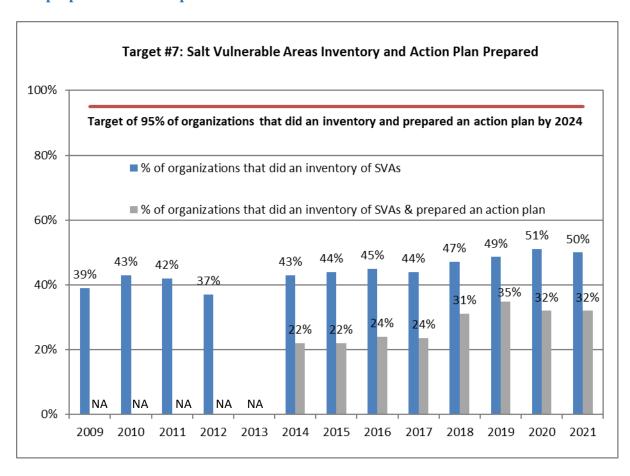
20%

0%

• Performance indicator 7: "Salt-vulnerable areas" indicates if organizations have identified salt-vulnerable areas and if an action plan has been prepared with the purpose of protecting those areas that are particularly sensitive to road salts. While information on identification of salt-vulnerable areas is available for all years except 2013 (due to data collection inconsistencies), information on preparation of an action plan is not available for 2009-2013. Figure I presents the percentage of road organizations that have identified salt vulnerable areas, as well as the percentage of road organizations that have met the performance indicator (both identifying vulnerable areas and preparing action plans). To help achieve this target, Environment and Climate Change Canada is considering additional guidance to establish common standards for identification of salt-vulnerable areas. As such, it should be noted that the target for this indicator is set for 2024.

2009 2010 2011 2012 2013 2014 2015 2016 2017 2018 2019 2020 2021

Figure I: Percentage of road organizations that have identified salt vulnerable areas and prepared an action plan



# **Progress Towards the National Targets**

Setting national targets offers transparency in the expected performance level from road organizations and provides a basis for conducting the second review of the effectiveness of the Code. National targets assist road organizations in prioritizing their ongoing efforts in the management of road salts.

The summary of the results of the Code since 2015, provided in Figure A, shows the progression in achieving national targets over time. While some targets are achieved or close to being achieved (Targets #1, #3, #4 and #5), others are not (Targets #2, #6a and #6b). A Review of the Code is underway for data received to 2019. The review will evaluate the results for each target, identify potential barriers for reaching the established targets and actions for consideration to improve Code implementation and the environmental management of road salt.

Environment and Climate Change Canada will continue to promote the implementation of the Code with stakeholders, consisting of provincial and municipal road authorities, federal and provincial governments, related associations, industry, environmental non-governmental organizations, and academics, in order to encourage the implementation of best practices in road salt management and prevent or reduce negative impacts of road salts on the environment.

#### **Contact Us**

For questions about the Code or for more information about salt management, please contact us.

# Annex 1: Highlights of reported data for 2014 to 2021 reporting seasons

# **Highlights: 2021 Reported Data in the Context of National Targets**

#### Results reported for winter 2020-2021:

- o 219 road organizations, including 7 provinces, 1 territory, 195 municipalities, 5 private road organizations, 11 national parks and other federal organizations, reported under the Code (target is 220).
- o 57% annually reviewed their road salt management plan (target is 100%).
- o 100% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 72% of their treated abrasives are covered (target is 75%).
- o 94% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 66% are using pre-wetting or pre-treated salts (target is 95%).
- o 68% of their vehicles are equipped for pre-wetting (target is 75%).
- o 32% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

# **Highlights: 2020 Reported Data in the Context of National Targets**

## Results reported for winter 2019-2020:

- 218 road organizations, including 8 provinces, 1 territory, 194 municipalities, 5 private road organizations, 10 national parks and other federal organizations, reported under the Code (target is 220).
- o 56% annually reviewed their road salt management plan (target is 100%).
- o 100% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 69% of their treated abrasives are covered (target is 75%).
- o 95% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 69% are using pre-wetting or pre-treated salts (target is 95%).
- o 66% of their vehicles are equipped for pre-wetting (target is 75%).
- o 32% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

#### **Highlights: 2019 Reported Data in the Context of National Targets**

#### Results reported for winter **2018-2019**:

- o 216 road organizations, including 8 provinces, 1 territory, 189 municipalities, 7 private road organizations, 8 national parks and 3 other federal organizations, reported under the Code (target is 220).
- o 62% annually reviewed their road salt management plan (target is 100%).
- o 97% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 72% of their treated abrasives are covered (target is 75%).
- o 93% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 65% are using pre-wetting or pre-treated salts (target is 95%).
- o 65% of their vehicles are equipped for pre-wetting (target is 75%).
- o 35% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

#### **Highlights: 2018 Reported Data in the Context of National Targets**

#### Results reported for winter 2017-2018:

- 212 road organizations, including 8 provinces, 1 territory, 187 municipalities, 5 private road organizations, 8 national parks and 3 other federal organizations, reported under the Code (target is 220).
- o 58% annually reviewed their road salt management plan (target is 100%).
- o 99% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 72% of their treated abrasives are covered (target is 75%).
- o 94% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 67% are using pre-wetting or pre-treated salts (target is 95%).
- o 64% of their vehicles are equipped for pre-wetting (target is 75%).
- o 31% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

# **Highlights: 2017 Reported Data in the Context of National Targets**

## Results reported for winter 2016-2017:

- o 225 road organizations, including 8 provinces, 1 territory, 200 municipalities, 6 private road organizations, 7 national parks and 3 other federal organizations, reported under the Code (target is 220).
- o 57% annually reviewed their road salt management plan (target is 100%).
- o 99% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 61% of their treated abrasives are covered (target is 75%).
- o 94% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 61% are using pre-wetting or pre-treated salts (target is 95%).
- o 62% of their vehicles are equipped for pre-wetting (target is 75%).
- o 24% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

# **Highlights: 2016 Reported Data in the Context of National Targets**

#### Results reported for winter 2015-2016:

- 199 road organizations, including 8 provinces, 1 territory, 175 municipalities, 5 private road organizations, 6 national parks and 4 other federal organizations, reported under the Code (target is 220).
- o 63% annually reviewed their road salt management plan (target is 100%).
- o 99% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 64% of their treated abrasives are covered (target is 75%).
- o 96% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 65% are using pre-wetting or pre-treated salts (target is 95%).
- o 60% of their vehicles are equipped for pre-wetting (target is 75%).
- o 24% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

# **Highlights: 2015 Reported Data in the Context of National Targets**

## Results reported for winter **2014-2015**:

- 208 road organizations, including 8 provinces, 184 municipalities, 5 private road organizations,
   7 national parks and 4 other federal organizations, reported under the Code (target is 220).
- o 60% annually reviewed their road salt management plan (target is 100%).
- o 99% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 68% of their treated abrasives are covered (target is 75%).
- o 94% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 68% are using pre-wetting or pre-treated salts (target is 95%).
- o 64% of their vehicles are equipped for pre-wetting (target is 75%).
- o 22% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

# **Highlights: 2014 Reported Data in the Context of National Targets**

#### Results reported for winter 2013-2014:

- o 202 road organizations, including 8 provinces, 180 municipalities, 4 private road organizations, 7 national parks and 3 other federal organizations, reported under the Code (target is 220).
- o 60% annually reviewed their road salt management plan (target is 100%).
- o 100% of their road salts are under a permanent roof and on impermeable pads (target is 100%).
- o 67% of their treated abrasives are covered (target is 75%).
- o 93% of their vehicles are equipped with groundspeed electronic controllers (target is 95%).
- o 65% are using pre-wetting or pre-treated salts (target is 95%).
- o 67% of their vehicles are equipped for pre-wetting (target is 75%).
- o 22% of road organizations have identified their salt-vulnerable areas and have prepared an action plan (target is 95%, set for 2024).

Annex 2: Road organizations that have reported under the Code of Practice for 2019-2021

Federal Organ	izations
Cape Breton Hi	ghlands National Park, Nova Scotia (Parks Canada)
	Park, New Brunswick (Parks Canada)
Gros Morne Na	tional Park (Parks Canada)
	National Park, New Brunswick (Parks Canada)
Parks Canada A	
Prince Albert N	(ational Park, Saskatchewan (Parks Canada)
Public Works a	nd Government Services Canada
Riding Mountai	in National Park, Manitoba (Parks Canada)
	ional Park, Newfoundland and Labrador (Parks Canada)
The Seaway Int	ernational Bridge Corporation Ltd., Ontario
	s National Park, Alberta (Parks Canada)
Provincial and	Territorial Organizations
Alberta Transpo	ortation
	ia Ministry of Transportation & Infrastructure
	structure & Transportation
New Brunswick	A Department of Transportation and Infrastructure
	epartment of Transportation and Infrastructure Renewal
	ry of Transportation
	Ministry of Highways and Infrastructure
Yukon Territori	ial Government
Municipal Org	ganizations
Province	Organization Name
Alberta	Brazeau County
	City of Airdrie
	City of Calgary
	City of Edmonton
	City of Lacombe
	City of Leduc
	City of Lethbridge
	City of Medicine Hat
	City of Red Deer
	City of St. Albert
	Clearwater County
	County of St. Paul No. 19
	Lac La Biche County
	Lacombe County
	Leduc County
	Mackenzie County
	Municipal District of Foothills No. 31

	Municipal District of Wainwright
	Northern Sunrise County
	Strathcona County
	Town of Okotoks
	Weslock County
British	City of Castlegar
Columbia	City of Chilliwack
	City of Coquitlam
	City of Kamloops
	City of Kelowna
	City of Maple Ridge
	City of Nanaimo
	City of New Westminster
	City of Penticton
	City of Port Alberni
	City of Port Coquitlam
	City of Port Moody
	City of Prince George
	City of Surrey
	City of Vancouver
	City of Williams Lake
	Corporation of the District of North Cowichan
	District of North Saanich
	District of North Vancouver
	District of Saanich
	District of West Vancouver
	Village of Lumby
Manitoba	City of Winnipeg, Water and Waste Department
New	Caraquet
Brunswick	City of Fredericton
	City of Moncton
	Town of Dalhousie
	Town of Grand Bay-Westfield
	Town Of Hampton
	Town of Quispsmsis
	Town of Riverview
	Town Of Shediac
	Town of Sussex
Newfoundland	City Of Mount Pearl
and Labrador	City of St. John's
	Conception Bay South
	Town of Gander
	Town of Grand Falls-Windsor

	Town of Paradise
Nova Scotia	Cape Breton Regional
	Halifax Regional Municipality
	Town of Amherst
	Town of Bridgewater
	Town of Windsor
	Town of Wolfville
	Town of Yarmouth
Ontario	City of Greater Sudbury
	City of Hamilton
	City of Markham
	City of Mississauga
	City of Ottawa
	City of Owen Sound
	City of Peterborough
	City of Pickering
	City of Sarnia
	City of Sault Ste. Marie
	City of Toronto
	City of Vaughan
	City of Windsor
	City of Woodstock
	Clarington
	Corporation of the City of Barrie
	Corporation of the City of Belleville
	Corporation of the City of Brampton
	Corporation of the City of Brockville
	Corporation of the City of Cambridge
	Corporation of the City of Cornwall
	Corporation of the City of Guelph
	Corporation of the City of Kitchener
	Corporation of the City of London
	Corporation of the City of North Bay
	Corporation of the City of North Bay  Corporation of the City of Oshawa
	Corporation of the City of Port Colborne
	Corporation of the City of 1 of Coloonic  Corporation of the City of St. Catharines
	Corporation of the City of St. Catharnes  Corporation of the City of St. Thomas
	Corporation of the City of St. Thomas  Corporation of the City of Timmins
	Corporation of the City of Triminis  Corporation of the County of Bruce
	Corporation of the County of Bruce  Corporation of the County of Dufferin
	Corporation of the County of Essex
	Corporation of the County of Essex  Corporation of the County of Lambton
	Corporation of the County of Lanark  Corporation of the County of Lanark
	Corporation of the County of Lanark

Corporation of the County of Northumberland
Corporation of the County of Perth
Corporation of the County of Wellington
Corporation of the Municipality of Central Elgin
Corporation of the Municipality of Halton Hills
Corporation of the Municipality of Kincardine
Corporation of the Municipality of Trent Hills
Corporation of the Municipality of West Perth
Corporation of the Town of Bracebridge
Corporation of the Town of Bradford West Gwillimbury
Corporation of the Town of Caledon
Corporation of the Town of Collingwood
Corporation of the Town of Fort Erie
Corporation of the Town of Goderich
Corporation of the Town of Espanola
Corporation of the Town of Essex
Corporation of the Town of Gravenhurst
Corporation of the Town of Hawkesbury
Corporation of the Town of Minto
Corporation of the Town of New Tecumseth
Corporation of the Town of Newmarket
Corporation of the Town of Pelham
Corporation of the Town of Penetanguishene
Corporation of the Town of Petawawa
Corporation of the Town of Plympton-Wyoming
Corporation of the Town of Tecumseh
Corporation of The Town of The Blue Mountains
Corporation of the Town of Tillsonburg
Corporation of the Township of Addington Highlands
Corporation of the Township of Adjala-Tosorontio
Corporation of the Township of Centre Wellington
Corporation of the Township of East Hawkesbury
Corporation of the Township of Norwich
Corporation of the Township of Perth South
Corporation of the Township of Scugog
Corporation of the Township of South Stormont
Corporation of the Township of St Clair
Corporation of the Township of Stone Mills
Corporation of the Township of Wilmot
Corporation of the United Counties of Leeds and Greenville
Corporation of the United Counties of Prescott and Russell
Corporation of the United Counties of Stormont, Dundas and Glengarry
County of Brant

County of Elgin
County of Haliburton
County of Middlesex
County of Simcoe
Grey County Transportation Services Department
Municipality of Chatham-Kent
Municipality of Middlesex Centre
Municipality of Mississippi Mills
Municipality of South Dundas
Municipality of Thames Centre
Municipality of the Town of Perth
Oxford County
Region of Peel
Region of Waterloo, Waste Management Division
Regional Municipality of Durham
Regional Municipality of Niagara
The Regional Municipality of York
South Frontenac Township
Town of Ajax
Town of Arnprior
Town of East Gwillimbury
Town of Greater Napanee
Town of Grimsby
Town of Ingersoll
Town of Innisfil
Town of Kingsville
Town of Niagara-on-the-Lake
Town of Oakville
Town of Renfrew
Town of Richmond Hill
Town of Whitby
Township of Bonnechere Valley
Township of King
Township of Mapleton
Township of North Dumfries
Township of Oro-Medonte
Township of Puslinch
Township of Selwyn
Township of Sioux Narrows-Nestor Falls
Township of South Glengarry
Township of Springwater
Township of Stirling-Rawdon
Township of Tiny

	Township of Uxbridge
	Township of Wellesley
	Township of West Lincoln
	Tyendinaga Township
Saskatchewan	City of Saskatoon
Yukon	City of Whitehorse
Private Organi	izations
	ession Company Ltd.
407 ETR Conce	
407 ETR Conce Brun-Way High	ession Company Ltd.
407 ETR Conce Brun-Way High	ession Company Ltd. nways Operations Inc. vay Operations Inc.

## Additional information can be obtained at:

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