



**Automobile Protection Association**

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The Honourable Anita Anand  
Minister of Transport  
House of Commons  
Ottawa, Ontario,  
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Dear Minister Anand:

I am writing you to ask Transport Canada to introduce regulations that will improve the reporting of safety-related vehicle incidents and the disclosure of active investigations by automakers to Transport Canada. This would help identify possible safety defects that need to be investigated, with the potential for timelier vehicle safety recalls.

What we ask is that Transport Canada require auto manufacturers or their Canadian distributors *to collect, maintain, and share certain information with Transport Canada about regulated vehicles, including information about [any] safety-related defects they are aware of in other markets where the vehicles are sold* (from [Let's Talk Transportation](#))

As you may know, the Automobile Protection Association (APA) is a clearing house for vehicle complaints of all types, including safety-related complaints. Founded in 1969, the APA has referred safety-related complaints to Transport Canada since the inception of the Ministry's motor vehicle defects investigations service in the early 1970s. The APA's public interest work has contributed to several vehicle recalls, and we have appeared before Committees of the House of Commons and Senate to support amendments to the Motor Vehicle Safety Act.

Recent events underscore the importance of changes to the regulations on the reporting of vehicle defects and sharing of information. I cite three of these below:

1. In October, the driver of a speeding Tesla Model 3 lost control on Toronto's Lakeshore Boulevard [and crashed the car, which caught fire](#). A bystander was able to break a side window, and one occupant was pulled out — the other four, who may have been trapped inside or were immobilized by their injuries, perished tragically.

2. In South Korea, a Mercedes EQE 350 in an [underground parking garage caught fire](#) and damaged almost 900 other vehicles in the parking facility. It took eight hours to extinguish the fire because neither the fire suppression facilities in the building nor the fire fighters' equipment were adequate to put out an EV fire like this one. Twenty-three people were hospitalized for smoke inhalation and 200 families had to evacuate their apartments.

After the fire, Mercedes-Benz set aside a fund to compensate residents for their losses. Of more interest to Transport Canada is that after the fire several EV makers began to voluntarily disclose the identity of their battery suppliers to Korean authorities, so that potential links between EV fires can be identified more readily. Canada should position itself to require this sort of information from the automakers when it is needed.

3. The government needs a clearer picture of what is going on with new technology like automated driving aids. Two recent CBC reports highlight safety issues with the automated collision avoidance systems on some new vehicles. After the reports aired, more than three dozen vehicle owners [reported to the CBC or the APA](#) that they had experienced collision avoidance system problems. Most had reported the malfunctions to the automakers or their dealers, but the complaints had not been shared with Transport Canada.

In Canada there is no central registry that captures all vehicle fires. Based on reports from provincial regulators and insurance companies, Transport Canada estimated that there are about 10,000 vehicle fires a year in Canada from all causes. Of those, less than 200 a year are reported to Transport Canada. Given the increasing presence of electric vehicles in the fleet, there is a need for better reporting to Transport Canada's Defect Investigations and Recalls Division.

The automakers are currently not obligated to pass on the customer complaints they receive about potential safety defects to Transport Canada, nor disclose their active investigations. Transport Canada should make periodic reporting mandatory. In this regard, the APA recommends a well-crafted solution that will place only a modest burden on the automakers and will not overwhelm Transport Canada's intake service. (Your Ministry certainly does not want large "dumps" of unsorted data in the manner required by US authorities after a scandal over a failure to report incidents by the Ford Motor Company and the Firestone Tire and Rubber Company.)

The APA very much looks forward to a response to this request from your office. A solution to the current solution would complete a consultation undertaken by one of your predecessors, the Hon. Marc Garneau, ca. 2018. The arguments in favour of encouraging the reporting of safety-related complaints back then are even more compelling today.

Yours truly,

A handwritten signature in cursive script that reads "George Iny".

George Iny  
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Automobile Protection Association

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